

Uckfield Town Council.
Background research on:
290 dwellings at Land at Bird in Eye Farm

WD/2021/2198/MAO – Application submitted Friday 1 October 2021
<http://planning.wealden.gov.uk/plandisp.aspx?recno=155234>



Bird-in-Eye Farm on Bird-in-Eye Hill, Uckfield

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1.0 Background

- 1.1 “There exists a great variety of landscapes that are representative of the different regions of the world. Combined works of nature and humankind, they express a long and intimate relationship between peoples and their natural environment. Certain sites reflect specific techniques of land use that guarantee and sustain biological diversity. Others, associated in the minds of the communities with powerful beliefs and artistic and traditional customs, embody an exceptional spiritual relationship of people with nature¹.”
- 1.2 The core appeal to visitors in Wealden is its beautiful, varied and unspoilt landscapes and views. It has undeveloped coastal cliffs, beaches and countryside that varies from ancient woodland, forests and heathland to a patchwork of medieval fields, parklands and open rolling downs. Attractive villages offer the visitor a warm welcome and you will see a wealth of historic timber-framed, flint and thatched buildings, so typical of the South East of England.² (Extract from Wealden Do Website)

2.0 Uckfield’s rural and agricultural identity

- 2.1 Since the 1950s in Ridgewood alone the following farms have been lost:
Dodds farm (New Barn)
The Anvills (farmland)
Hughes Farm (Mallard)
Pitts farm (Ridgewood Place)
Throughout Uckfield parish we have lost Manor Park (previously used for hops, grazing, and nurseries)
Uckfield House (mixed farmland), Streatfeilds (Rocks Park), Hunters Way (farmland), Keld Drive (farmland) and Hempstead lane (sheep, arable and fruit farming) and more.
- 2.2 With this cultural and heritage context destroyed by overdevelopment, the character of our community is lost and we become a homogenous sprawl without village or town definition and identity.
- 2.3 In Croudace’s Landscape and Visual Impact Assessment which references the National design guide 2019, it noted the importance of “*the location of the development and the attributes of its immediate, local and regional surroundings.*”
- 2.4 The Guide goes on to state that, ‘*An understanding of the context, history and cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments. It means they are well grounded in their locality and more likely to be acceptable to existing communities...*’
- *The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. It is not just about the buildings and how a place looks, but how it engages with all of the senses. Local character makes places distinctive. Well-designed, sustainable places with a strong identity give their users, occupiers and owners a sense of pride, helping to create and sustain communities and neighbourhoods.*

¹ <https://whc.unesco.org/en/culturallandscape/>

² <http://www.wealdendo-sussex.co.uk/>

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- 2.5 Bird in Eye Farm is mentioned as far back as 1841 in the 6 June Census and before that as part of the Buxted Park Estate. The Buxted Park estate is now a designated SSSI (since 1989) and Bird in Eye has been a working farm ever since. It is part of the sustainable biological diversity that makes up the very culture of life in Wealden District and our relationship with nature.
- 2.6 Framfield Place (adjacent land) is a Grade 2 listed building This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.
- 2.7 It should also be noted that agriculture is an important part of Wealden District's identity. Plumpton College are seeing an increase in admissions and we need to ensure that there are the agricultural facilities for these young people to work at, but also to ensure we can still produce local food for the local population. This then has a positive impact on climate change in that travel is less necessary and traffic movements are reduced, thus reducing emissions.
- 2.8 This, along with the risk of losing Horsted Pond Farm which is still used for animal grazing (cattle and sheep) such applications are actually removing the history and character of the rural market town, not enhancing it. There is a still a need for land. Where are the horses at Bird in Eye going to stabled if there is no Bird in Eye Farm and no Sussex Horse Rescue, which has already been sold.
- 3.0 Reflecting the local character**
- 3.1 This development proposal is contradictory to that statement and therefore the National Planning Framework:³ The purpose of the planning system is to contribute to the achievement of sustainable development.
- **an economic objective** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*
 - **a social objective** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - **an environmental objective** – *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy but, in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.*
- 3.2 A Character Assessment has been developed for the development of a draft Uckfield Neighbourhood Plan. This clearly highlights the characteristics of the New Town area of Uckfield, and with this the limitations of this area for development. See overleaf...
- 3.3 Croudace have explained that they are a family-based business and seek to ensure that any new development becomes part of the existing community but this proposal for development is purely an add on to the existing urban centre of Uckfield. There is no evidence to suggest it will integrate or enhance the existing community as other than a SANGS and play area, no further facilities are being provided. All Framfield Parish will benefit from is a muddy footpath towards the village.

³ <https://www.gov.uk/guidance/national-planning-policy-framework/2-achieving-sustainable-development>

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Landscape Character Area – Uckfield New Town (CA2)

Key Characteristics	Summary Description	Plan
<ul style="list-style-type: none"> • mostly residential in land use with a sprinkling of businesses situated along Framfield Road and the main road through New Town; • there is an emphasis on healthcare and public services, with a collection of dentists and vets located on the hill of New Town, the Uckfield Community Hospital and Bird in Eye Surgery in the east of New Town and Police station; • properties located within the east, tend to be older in age (late 19th century, early 20th century), and of terrace or semi-detached cottage design, with small to no gardens at the front of the properties; • the most striking row of properties in New Town is Croft Cottages in Framfield Road, known as The Croft; • New Town sits at ground level at its most northern point by the river Uck and rises to higher ground, to the south. A good view of the hill in New Town can be seen from Luxfords car park in the centre of the town. Fantastic views into the town of Uckfield and out to the South Downs can be captured at Victoria Pleasure Ground; • residential streets tend to be narrow in the east, with limited parking facilities for households. The occasional property with a garage is likely to have been originally owned by a tradesman with horse and cart; • due to the close proximity of the houses to each other and the roadside, there are limited opportunities to provide wider footpaths and introduce cycle paths. Twittens and alleyways are present however in the area of Alexandra and Keld; • the steepness of the roads accessing the residential housing on the western side of New Town, proves difficult in the winter; • large green spaces sit on the western periphery- Victoria Pleasure Ground, New Barn and ancient Boothland Wood. 	<p>New Town is located to the south of the railway line, with a number of buildings representative of the history and heritage of Uckfield. Limited change has been seen to the east of the character area.</p> <p>New Town developed quite substantially after the completion of the railway line in 1866. A number of the terraced rows of modest worker houses to the east of New Town road, were built in the late 19th century, early 20th century, with larger detached properties lining the hill of New Town. 18 prefabricated 'homes for heroes' were built in Vernon Road post war (1947) in the eastern area of New Town. Whereas the newer residential developments of Forge Rise, Farriers Way and Bridge Farm Road were built on the western side of New Town, in the mid-1980s. The town has since seen fresh development in the past five years just off Old Timbers Lane, named College Place.</p> <p>Roads in the east of New Town are narrow; causing difficulties with parking and traffic flow.</p>	 <p>Map of Character Area CA2</p>  <p>Satellite image of Character Area CA2</p>

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Typical Views – Uckfield New Town (CA2)



Harcourt Road
– looking north towards Framfield Road



Foresters Hall – built in 1904 - was the town's first cinema, before becoming a dance hall, followed by a council owned building



Framfield Road
– Bird in Eye Terrace looking west into town



View from Victoria Pleasure Ground out of town



View up into Farriers Way



View from the hill in New Town north, towards the Town Centre

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4.0 Previous application(s) for development

- 4.1 In 2008 BIES was subject to a planning application for 197 houses and the appeal was dismissed by the Secretary of State due to:
- No choice of pedestrian or cycle routes into town
 - Without a town centre management scheme to reduce car usage only 300 units could be built. Since then, Taylor Wimpey have built 250, Ridgewood place will see another 750, Mallard has 119, Eastbourne Road has 90. There has also been a development built at Fernley park, Sandridge and Shepherds gate.
 - The BIE schemes are unacceptable on the grounds of traffic impact
 - There are some site-specific drawbacks in terms of transport sustainability and the town centre linkage.
 - Given the relatively small quantum of employment development proposed by each scheme, the Secretary of State does not consider that this carries significant weight in the determination of the appeals.

5.0 Consultation by Croudace

- 5.1 Croudace issued a public consultation paper to residents of Mallard Drive on Friday 9 April, which is the estate directly adjacent to the development land. The new Mallard development of 119 dwellings sits just the other side of the Framfield stream that the BIE land runs down to. The consultation paper was delivered to Forge Rise on Monday 12 April – an estate directly affected by the increase in traffic at Framfield road and to other residents directly affected by the proposals during the week of 5 April. Residents in Olives Meadow received theirs on 15 April. The consultation period was then extended after a complaint was made to Croudace by an Uckfield Town Councillor by one week. Whilst advertised on a website, no advertising was witnessed on social media.
- 5.2 None of the residents in the houses on Bird in Eye Hill – directly adjacent to the proposed development and most likely to be impacted by the development received a copy of the consultation paper. Neither did any resident of Framfield.
- 5.3 Therefore the developers/planning agents' reference to consultation was extremely limited. The consultation period was in effect 1-10 days as a reply was required by Friday 16 April.
- 5.4 Considering such a development would have a huge impact on Uckfield; to infrastructure flood risk ecology and diversity, the site having already been subject to a full inquiry, and the proposal showing an increase in dwellings from 197 – 290, the process of public consultation has appeared rushed.
- 5.5 An informal presentation to Uckfield Town Council also appeared patronising with phrases like "*shall we explain the definition of the acronym SANGs,*" when it is clearly obvious that the Town Council would be familiar with a SANGS with an extensive one located at Horsted Green Park and Crowborough.
- 5.6 By being submitted too early this application has also omitted the results of a co-ordinated piece of work to look at the whole of Uckfield with an East Sussex Highways Road modelling plan. All major developers (including Croudace) had agreed on memorandum of understanding to consider how best to ease the transport and congestion issues in and around Uckfield. Without this it is not possible to mitigate and or plan the effects of this development. And previous correspondence with Wealden DC

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and ES Highways was in regard to 175 dwellings not 290 so extremely weak in terms of the evidence base.

6.0 Location of the proposed development

- 6.1 Uckfield is not (in terms of location), one of the most sustainable locations for growth in the District⁴. It is an unusual town within Wealden as it is divided by both a railway and river (which is subject to frequent flooding). There are narrow roads and many character cottages which have short frontages directly onto the roadside, meaning there is limited or no parking facilities. The community and leisure facilities are in the mid and north of the town and development is being built to the mid and south of the town putting further strain on an already congested highway system. There is only one road through the centre of town and the bypass to the west of the town is not a dual carriageway.
- 6.2 By the developers own admission and referenced by the Head of Planning & Environmental Services to the developer back in January 2020, it was stated that *“This site is outside the Uckfield development boundary in the 1998 Wealden Local Plan. It is also outside any development boundary accepted (that is retained or expanded etc.) within the Wealden Core Strategy 2013. As a starting point therefore, the site is contrary to the development plan and should be resisted, unless there were persuasive considerations that justified taking a different view”*
- 6.3 By allowing BIES outside the planning area it will open the floodgates for BIEN and Sussex Horse Rescue potentially joining Framfield to Uckfield which is a historic Saxon Village dating to 9th Century and mentioned in the Domesday Book. This will also fill in the green corridor between the two settlements (Uckfield and Framfield) which is contrary to planning policy.
- 6.4 There has been no mitigation to override the negative impacts of such a large development to the Parish of Framfield (in which this site sits) which has few local amenities and residents travel to Heathfield or Uckfield to access services and shops. The developer (Croudace) has been insensitive to the needs of the local community and there is no mitigation/improvement to infrastructure to Framfield, instead the developer has drawn on the services, shops and supplies of Uckfield Town Centre to achieve the necessary requirements of provision; despite the lack of suitable and safe transport or pedestrian access from the development to Uckfield Town Centre.
- 6.5 The proposed location of the development is in breach of the parish boundaries (naturally formed by the Framfield Stream) and this development will mean that the distinct character of each settlement is lost.
- 6.6 One resident noted that Wealden DC only stated in 2017, *“land within the floodplain of the River Uck and Framfield, wider areas of farmland and woodland to the east, and small ribbon of properties along Bird in Eye Hill have been excluded from development to prevent an outward encroachment of development into the rural landscape.”*

7.0 Agriculture

- 7.1 The way that agricultural land is being used is changing and in an area where agricultural land has traditionally been a source of work and provision of food any further loss of agricultural land in Wealden is significant. The total land area of the UK amounts to over 24 million hectares with more than 75% of

⁴ Covering letter from Woolf Bond Planning submitted to WDC

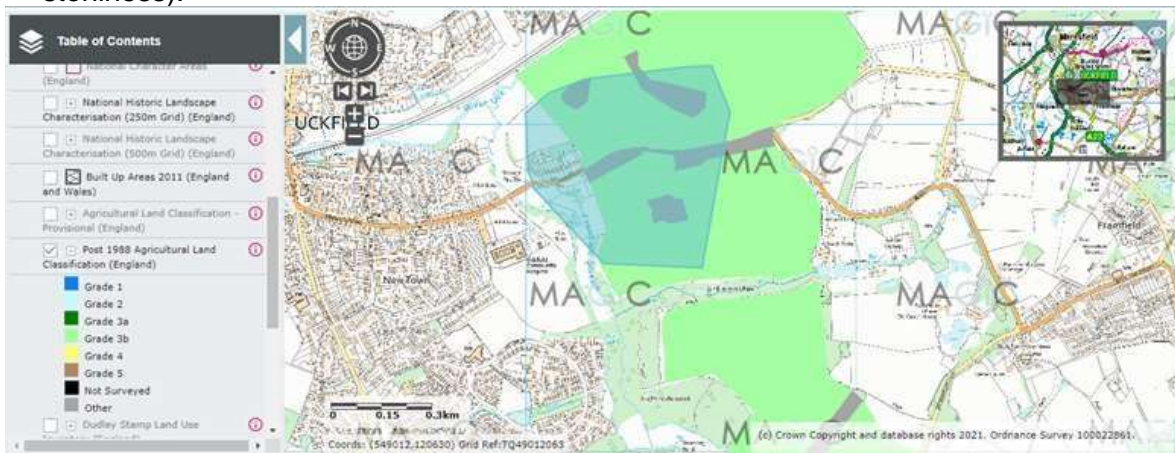
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that used for farming. While self-sufficient in products like barley, wheat, milk, lamb and mutton, the UK still imports large amounts of fruit and vegetables and other farm products including pork. The UK runs a food, feed and drink trade deficit of £18.6bn and the UK population is expected to exceed 70 million by 2030, this extra demand for living space and food will have a major impact on the way land is used. The UK Government is committed to using bioenergy crops such as miscanthus as renewable sources of energy, further limiting the stock of land for food.⁵

- 7.3 It is suggested that all these factors will require an extra seven million hectares of land by 2030 which could provide job opportunities in Wealden and protect our landscapes and natural habitats.⁶
- 7.4 Defra's Magic Maps, highlights that the land in this area is Grade 3b Post 1988 Agricultural Land Classification (England). Grade one is best quality and grade five is poorest quality. A number of consistent criteria were used for assessment which include climate (temperature, rainfall, aspect, exposure, frost risk), site (gradient, microrelief, flood risk) and soil (depth, structure, texture, chemicals, stoniness).



8.0 Heritage

- 8.1 The farm itself is a Grade 2 listed building.



⁵ <https://www.cisl.cam.ac.uk/business-action/business-nature/natural-capital-impact-group>

⁶ <https://www.bbc.co.uk/news/science-environment-28003435>

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9.0 Highways (access, traffic flow and safety)

- 9.1 First and foremost the information included in the report “**Transport Assessment – Part 1 – Report & Appendices 1- 10**” is both inaccurate and out of date. For this main reason, Uckfield Town Council believes that the planning application should be deferred at least, if not refused until more appropriate and evidence based data is incorporated in their proposals.

An example of inaccuracy:

The report states that “*Extensive discussions have been held with the County Highway Authority (CHA) and Local Planning Authority (LPA) which has included pre-application meetings with the CHA on 5th September and 5th December 2019, and LPA on 30th January 2020. Pre-application comments were received from both Authorities on 31st January 2020 and 28th February 2020, respectively.*”

- 9.2 The date of such meetings/correspondence is two years ago – a lot has happened since then! The Covid 19 pandemic has changed the way people work, move around and their leisure/transport habits. Plus further to this, Uckfield Town Council knows that extensive discussions have not taken place. Perhaps initial discussions- a phone call or correspondence by letter, but when questioned, it was confirmed by East Sussex County Council in a meeting the Town Clerk had with them in May 2021, that there had been no extensive discussions with Croudace with regards to highways, and this site. The truth has been stretched for financial gain.

9.3 Proposal to introduce a SCOOT system

“To accommodate the increase in traffic from the proposed development of up to 290 units, it is proposed to link the two signalised junctions via a SCOOT type system. It has been demonstrated that the proposed improvements will provide sufficient capacity to accommodate the proposed development traffic and will provide an overall highway benefit at the junctions within the centre of Uckfield, particularly during the PM network peak hour.”

As a local resident pointed out “*SCOOT is a demand led system of traffic light control. So instead of each traffic light being green in one direction for a pre-set time, the system measures where the highest traffic flow is coming from and prioritises that traffic light. It is particularly good where there is a single dominant flow, as it can redirect any spare capacity from roads where there are no vehicles waiting to allow the lights from the dominant flow to be on green for longer. However in central Uckfield, in the peak periods, there is no dominant flow, but every entrance to the traffic lights, with the possible exception of Bridge Farm Road has queuing traffic. So there is no spare capacity on any of the entrance points which could be redistributed to the other entrance points. Further the existing 20mph speed restriction limits the speed at which vehicles can exit the system, so again reducing overall capacity. So SCOOT would provide very little benefit outside the peaks, when the congestion is not so bad.*”

- 9.4 More worrying is the fact that when East Sussex County Council initially responded that they wouldn't dismiss the proposed installation of the SCOOT system it looks like there had been a suggestion by the developer “*to remove a High Street building with a view to improve Bell Lane junction*” Should Uckfield be fortunate that the developers are now just looking at painting some yellow lines to form a box at the junction?
- 9.5 It should also be questioned that the High Street improvements of 2016 included changes to the traffic light systems and junctions so we were advised modifications to the traffic light operation in the town had taken place. Such a proposal would therefore jeopardise the previous work undertaken and potentially bring

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Uckfield to a standstill.

9.6 Traffic surveys

The timing of the traffic surveys completed are useless to understand the full picture with regards to traffic in Uckfield. The report states:

“To assist with discussions at the pre-application stage, Bellamy Roberts undertook initial traffic surveys of the local highway network in July 2019, which included the following: • Two Automatic Traffic Counters (ATC) on Bird in Eye Hill either side of the proposed site access (9th-15th July 2019); and • Turning count and queue length surveys at the Framfield Road/High Street/Bridge Farm Road signalised crossroads and High Street/Bell Lane signalised T-junction within the centre of Uckfield (9th July 2019).”

At the pre-application stage, a development of 275 units was assessed and the County Highway Authority (CHA) was provided with junction capacity assessments of the two key town centre junctions, both of which were validated using data from the queue length surveys. Within their pre-application comments, the CHA requested a 7-day survey of the two key town centre junctions, and this was undertaken in October/November 2020. As will be considered later in this Transport Assessment, the flows recorded during the October/November 2020 surveys were comparable to those from July 2019.”

9.7 Looking at the highlighted timings of traffic surveys undertaken above. The period 9 – 15 July is not only enrichment week at Uckfield College when students are undertaking work experience, it's also leading up to the school holidays so any GCSE/A-level students would have since departed in the June, there would be less travel within and out of the town to reach Uckfield College. The children in primary year 6 are also encouraged to walk to school in the last half of the summer half term in preparation of starting secondary education. The first surveys were also undertaken nearly two and a half years ago. A lot has happened since then. The surveys undertaken in October/November would be even more useless in their data, in that this period would have included October half term, when all school traffic is missing, and in November 2020, the whole of the England was on a national lockdown. So this data is flawed before we even begin.

9.8 Accuracy of accident data

The accuracy of the accident data being referenced is also questionable.

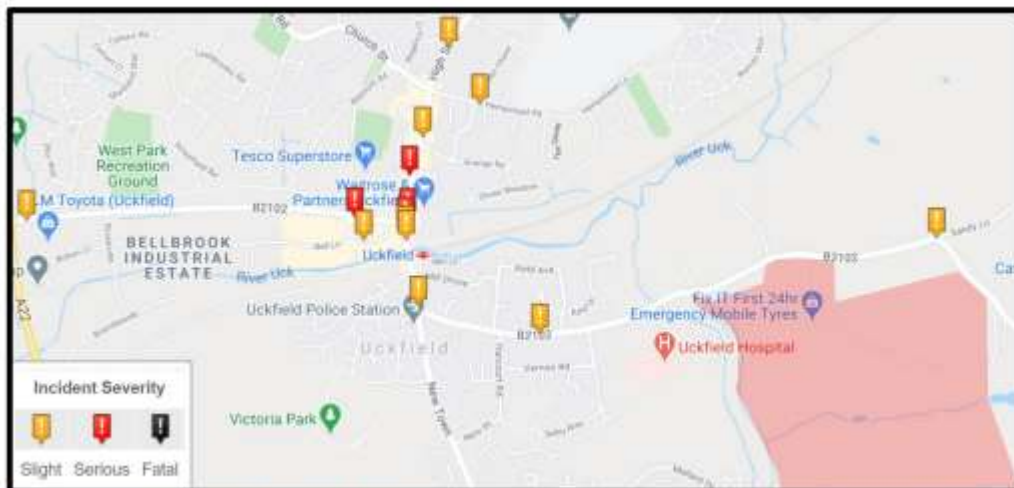


Figure 4: Location of Recorded Collisions

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The map referenced in the report indicates that there has only been one slight accident on the Framfield Road junction. This is incorrect, there are two quite clear accidents that the Town Clerk is aware of, which would not be regarded as slight. One was fatal, and one caused a head injury to the cyclist.

Just at that junction, there was a fatal accident in September 2017:
<https://www.kentlive.news/news/sussex-news/man-20s-died-after-bike-491912>

The second memorable incident we're aware was in April 2017:
<https://uckfieldnews.com/cyclist-taken-to-hospital-after-collision-in-uckfield/>

9.9 Proposal to improve bus services

At present, the 231 service travels between Heathfield and Uckfield via Framfield Road which is run by Compass Travel. Many cuts have been made to this service over the years, with the frequency of the service reducing substantially. So much so, the Town Council along with other parishes, has to contribute towards a Saturday bus service to try and support residents in the villages along this route to reach either Heathfield or Uckfield for provisions. Parish and Town Councils should not be funding bus services, this is completely outside of their jurisdiction.

9.10 The current bus service timetable is as follows:

231 - Uckfield - Heathfield - Etchingham

A bus service operated by Compass Travel

Map Tracking 1 bus

Friday 29 October 2021

Uckfield - Etchingham

☐ Show all stops

Uckfield Bus Station (Stand B)	07:35	10:25	12:05	13:40	15:50	17:35
New Town, opp Community Hospital	07:40	10:30	12:10	13:45	15:55	17:40
Framfield, adj School	07:44	10:34	12:14	13:49	15:59	17:44
Blackboys, adj Gun Road	07:49	10:39	12:19	13:54	16:04	17:49
Cross In Hand (opp)	07:54	10:44	12:24	13:59	16:09	17:54
Heathfield, adj Streatfield Road	07:57	10:47	12:27	14:02	16:12	17:57
Broad Oak, o/s Post Office	06:49	08:11	10:51	12:31	14:06	16:16
Burwash Common, opp Vicarage Road	06:53	08:15	10:51	12:31	14:06	16:16
Burwash, adj Post Office	06:57	08:19	10:57	12:37	14:12	16:22
Burwash, adj Strand Meadow	07:01	08:23	11:01	12:41	14:16	16:26
Etchingham, adj Railway Station	07:06	08:28	11:03	12:43	14:18	16:28
	07:06	08:28	11:09	12:48	14:23	16:33
Operates during School Holidays			Operates during School Holidays			

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Etchingham - Uckfield

☐ Show all stops

Etchingham, opp Railway Station	07:47	09:30	11:10	12:50	15:00	16:45	18:20
Burwash, adj Strand Meadow	07:53	09:36	11:16	12:56	15:06	16:51	18:23
Burwash, opp Post Office	07:56	09:39	11:19	12:59	15:09	16:54	18:26
Burwash Common, adj Vicarage Road	08:01	09:43	11:23	13:03	15:13	16:58	18:30
Broad Oak, opp Post Office	08:08	09:49	11:29	13:09	15:19	17:04	18:34
Heathfield, adj Fire Station	08:13	09:53	11:33	13:13	15:23	17:08	18:38
	07:00	08:15	09:55	11:35	13:15	15:25	17:10
Cross In Hand (adj)	07:05	08:20	09:58	11:38	13:18	15:28	17:13
Blackboys, opp Gun Road	07:10	08:25	10:03	11:43	13:23	15:33	17:18
Framfield, opp School	07:14	08:29	10:07	11:47	13:27	15:37	17:22
New Town, adj Community Hospital	07:17	08:32	10:10	11:50	13:30	15:40	17:25
Uckfield Bus Station (Stand B)	07:21	08:36	10:14	11:54	13:34	15:46	17:29
	Operates during School Holidays				Operates during School Holidays		

- 9.11 The report suggests that the developer will provide a funding contribution to increase services. In reality the development will complete the build on the site, hand over the lump sum to Compass Travel or appropriate service provider and walk away. There is nothing to enforce this moving forward after the properties have been built and ensure this bus service keeps running. The funding will run out, and the parish and town councils will be looked at once again to subsidise a service outside of their remit.
- 9.12 There is also no consideration for the impact of the pandemic on bus service usage. Dependency has reduced since Covid, due to changes in people's working patterns and the increase in working from home.
- 9.13 With the number of bus journeys taken in England fallen by 10 percent in the last decade, and funding for bus services down by nearly 40 percent,⁷ according to the National Audit Office and the need to look and 'green bus travel' the 'Future of Transport: rural strategy – call for evidence.gov.uk' is looking at the rural transport strategy.
- 9.14 The suggested travel plan and increased frequency of bus services is also all very well but the buses are going to struggle to manoeuvre in Framfield Road around the new parking restrictions and increased pressure placed on parked vehicles, and wider pavements.
- 9.15 An accident occurred in October 2021 between a bus and a lorry at the junction of Uckfield hospital and Bird in Eye Hill due to narrow access and parked cars.
- 9.16 The travel plan data was prepared during the Covid 19 pandemic and lockdown which has changed how people use public transport. A SYSTRA SURVEY REPORTED ⁸

20% of bus commuters feel that they will use public transport less after lockdown
57% of bus commuters will reduce their use of public transport due to fear of illness
27% of bus commuters have found other ways of making their public transport journeys

⁷ <https://www.rsnonline.org.uk/bus-services-make-fewer-journeys-and-lose-funding-over-past-decade>

⁸ <https://www.systra.co.uk/en/covid-19/covid-19-public-transport170/article/life-for-buses-after-lockdown>

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9.17 Traffic flows/modelling

For Wealden District Council and East Sussex Highways to accept this development in this location, it would need to demonstrate that there would be no detriment to an already acknowledged severe transport network which should not be further exacerbated by even a small number of trips in peak periods adding risk to road users and compromising road safety in the Framfield Road and connecting roads into Uckfield High street. As part of the overall strategy for growth in Uckfield there needs to be a town mitigation scheme in place before further developments are agreed by the planning authority especially modelling the impact from the proposed development and others in Framfield and surrounding areas which will access the Framfield Road directly.

9.18 The report states that the baseline for the junction modelling was 2020 (base year) in the middle of a pandemic when businesses and the town centre were shut for around five months out of 12. It is absolutely appalling that data which is likely to be flawed can be put forward as a case for specific highway improvements in order to mitigate the impact of developing of up to 290 homes.

9.19 The suggestions put forward by the developers as part of the mitigation of traffic

A considerable package of measures is proposed to mitigate the impact of the proposed development and are summarised as follows:

- *Extension to 30mph speed limit;*
- *Bus stop improvements;*
- *Bus service improvements;*
- *Car -club scheme;*
- *Framework Travel Plan;*
- *Installation of SCOOT system at town centre junctions;*
- *On-street parking improvements along Framfield Road; and*
- *Pedestrian and cycle improvements along Bird in Eye Hill/Framfield Road.*

9.20 On average in the UK people make 953 trips by car a year, or 18 trips a week.⁹
average occupancy of 3 people for the 290 houses = 870
18 trips per week by car x 870 people = 15660 extra car trips along the Framfield Road
The most common trip purpose in 2019 was for leisure (26%), followed by shopping trips (19%)¹⁰

And with the development of 290 homes, that will see at least 500 vehicles parked on that site.

⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906276/national-travel-survey-2019.pdf

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906276/national-travel-survey-2019.pdf

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9.21 The four-way junction at Framfield Road into town is congested every day as far back as the entrance to Harcourt Road and beyond the Highlands Pub (New Town) with queuing traffic on both the Eastbourne and Lewes Road. Harcourt Road is used as a cut through to Newtown/Ridgewood and it appears from the reports that nothing has been accounted for in terms of this, when studies have been undertaken. Increased traffic also needs to be modelled for both Selby/Harcourt Roads in New Town and Sandy Lane in Framfield.

9.22 Visibility is poor at the junction from Harcourt Road onto New Town due to parking on the right -hand side and a bus stop on the left- hand side. This is also a busy pedestrian area for children attending St Philips school and road safety would be compromised at either of these junctions for pedestrians with increased traffic.

9.23 Residents in Framfield road are already complaining of Air pollution caused by petrol and diesel fumes caused by the increase in traffic to Framfield Road over the last 10 years, and the Town Clerk has received complaints of noise pollution of vehicles in waiting traffic in Framfield Road. The monitoring of road traffic congestion and air quality is vital and Air Quality testing should be carried out in peak times at Framfield Road junction before any more traffic is fed onto the road by new development

9.24 Currently passed by the local planning authority, the following developments have permission:

Mallard Drive	119 houses
Eastbourne Road	90 houses
Ridgewood Farm (Taylor Wimpy)	250 with outline permission for 750 further properties

None of which are shown on the google map provided with the public consultation and therefore deceive the reader into seeing a lot of open green space, which in affect will be housing by the time the application is ready for building.

9.25 There are also proposals in Ridgewood for the following, with possible future potential at additional sites such as Bird in Eye North and Cysleys Farm:

Ridgewood House	46 homes
Siggs Fencing Yard	9 properties
Horsted Pond Farm	450 properties

Vehicles from all of these developments will access onto either the Eastbourne or Lewes Roads and lead onto the Highlands roundabout, down into town via New Town which has parked cars all along the eastern side daily due to the services based there and workers needing to park; and then leading to the congested Framfield Road junction.

9.26 A further 88 houses proposed for Framfield Nursery will again mean more vehicles joining the Framfield Road Junction, along with those from the Methodist Church Flats in Framfield Road.

9.27 A change in traffic light configuration or a yellow box at the left-hand turn to Bell Lane **will do very little and not alleviate the congestion**. The yellow box is just a left-over requirement from previous highway improvement schemes where they were re-prioritised.

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- 9.28 As previously noted the level of engagement that Croudace and various agents have had with East Sussex Highways is questionable. In the informal presentation Uckfield Town Council received from Croudace, it was suggested that Croudace had been working with East Sussex Highways for two years to model Framfield Road. East Sussex Highways and Wealden DC have explained no detailed meetings have taken place in person on highway modelling.
- 9.29 Addition of double yellow lines
In the report it states, “*As such, a scheme to formalise the on-street parking regime along Framfield Road has been considered. The proposed scheme includes the following (see Appendix 26) • Additional double yellow line road markings along the northern side of Framfield Road outside numbers 167-181; • Marked out parking bays along Framfield Road; and • Provision of build-out features to define the on-street parking areas more clearly and to help guide traffic.*”
- 9.30 Framfield Road is a very narrow road with properties directly fronting the road. Despite the estimation from East Sussex Highways that there are 26 spare car parking spaces, when assessed for the conversion to flats of the Methodist Church. The Church is situated on Framfield Road and will provide no extra parking upon conversion. Residents are often unable to park in Framfield Road, and in fact **overnight**, Mitchell and Cooper kindly provide their car park as an overflow for residents to park and the small car park next to the Town Council’s allotments become additional parking space. Should the roadside become unavailable for any reason then the pressure on car parking on both sides of Framfield Road, which already occurs, will increase, and it will move these parked vehicles to the already very congested roads of Keld, Alexander, Harcourt and Vernon. The Town Council’s Foresters Hall car park in Harcourt Road is also nearly full daily when it should be used for the hirers of the hall only. It is worth noting that all roads in this area have housing built at a time when no allowance was made for car usage and off- road parking. Many have converted front gardens to accommodate vehicles, increasing the flash flooding risk ¹¹ and putting extra strain on aging drainage systems.
- 9.31 Residents cannot be expected to park away from their homes. Croudace is a family run business and they must understand the importance for residents parking outside their homes.
- 9.32 Pedestrian and cycle access
There needs to be a localised site-specific mitigation strategy for Bird in Eye to show walking and cycling enhancements from the site into town to access the shops, community and leisure facilities. Currently the Sustrans modelling for cycling is not achievable along Framfield Road as both sides of the road allow parking for residents’ cars, due to the fact that the character of the properties along Framfield Road have very short frontages, no gardens and sit directly on the roadside in the main.
- 9.33 In addition to this, traffic is already at a standstill during peak times, queuing to exit the Framfield Road Junction. Any cycling or walkway from BIES would need to cross the Framfield Stream or River Uck to access all local amenities. There is no suggestion in the application on how this would be achieved.
- 9.34 Uckfield Town Council would have to dispute the travel plan prepared by Bellamy Roberts LLP¹²

¹¹ <https://www.unda.co.uk/news/paving-gardens-to-driveways-the-hidden-urban-flood-risk/>

¹² Land at Bird in Eye Farm, South of Bird in Eye Hill, Uckfield: Framework Travel Plan

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“Raise awareness of sustainable travel modes available to residents; • Encourage good urban design principles that maximise the permeability of the development for walking and cycling; • Improve existing infrastructure and ensure connectivity and assimilation both within the development and between the existing wider community; and • Avoid reliance on car usage, especially single occupancy vehicles.

3.3 The above objectives will be achieved by introducing a package of physical and management measures that will facilitate travel by sustainable modes”

- 9.35 For non-vehicle access to the town, health care facilities and school at Mallard Drive it would be necessary to either walk from BIE down on the road or through the woodland.
- Currently there is no path on either side of the Framfield Road from the hospital junction to BIE.
 - The road is narrow and placing a pavement on either side would reduce passing widths for vehicles and make buses accessing the road and bend difficult.
 - The road is on a hill, has a sharp bend and visibility is poor for traffic to see pedestrians.
 - There are multiple driveways left and right of Bird in Eye hill who have poor visibility on exit past the bend. Any pedestrian or cyclist would be at risk of collision especially on a day that enhances poor visibility and at night. Residents have been in talks with East Sussex Highways since 2015 about the need to reduce the speed limit in this area, for this very reason.
 - There are no cycle paths or footpaths that access BIE to Framfield Road and at the bottom of the hill at the entrance to the hospital is ancient woodland and the Framfield stream which would make access through this area very difficult. Thoughts need to be given for seating as well for those who need to rest.
- 9.36 In the 2008 refusal for building at BIE, the Secretary of State also had *regard to the Council’s claim that BIES may not be deliverable owing to concerns relating to the matter of legal title to a piece of land required for the main cycle/pedestrian route (IR780). If she had been minded to allow the BIES appeal, she is satisfied that this issue could have been satisfactorily dealt with by way of a Grampian condition to ensure that matters of legal title were fully explored before development could take place. However, in the circumstances of this case, the Secretary of State does not consider that the imposition of a Grampian condition would overcome the planning objections.*

Question: Could Croudace explain how this has since been sorted with regard to the legal title?

- 9.37 Creation of cycle and pedestrian paths through ancient woodland will destroy natural habitat and vegetation.¹³
- “Trampling along paths can change understorey vegetation considerably, with different woodland plant species being able to withstand different levels of disturbance. A three-year study by Hamberg et al. (2010) in Finland clearly showed the more frequently a path was used the greater the loss of vegetation. Even at low levels (less than 35 visits to a path per year) trampling resulted in a loss of up to 30% of the vegetation along a path. Higher use of paths (up to 550 visits per year) led to a loss of vegetation in excess of 75%.”*
- 9.38 Speed of traffic and road safety
- In 2015 Sarah Valentine and Brian Banks (ESSC and ES Highways) met with District Councillor Ann Newton, County Councillor Chris Dowling and a number of local residents and said that there is evidence to show that in reducing speed limits in areas such as BIE Hill would in fact have the opposite effect and cause a decrease in speed and to reduce to 30mph would not be supported

¹³ <https://www.woodlandtrust.org.uk/media/43619/impacts-of-nearby-development-on-the-ecology-of-ancient-woodland-addendum.pdf>

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within the current environment. Traffic calming and groundwork, signage etc to reduce the speed to 30mph would be expected to cost in the region of £110,000 and 50% of those costs would be expected to be met by the residents of BIE.

- 9.39 This is explained in more detail within a study from the US on the effects of raising and lower speed limits. In that *“the data clearly show that lowering posted speed limits did not reduce vehicle speeds or accidents. Also, lowering speed limits well below the 86th percentile speed did not increase speeds and accidents. Conversely, raising the posted speed limits did not increase speeds and accidents. The majority of motorist did not drive 5 to 10 mi/h (8 to 16 km/h) above the posted speed limit when speed limits were raised, nor did they reduce their speed by 5 or 10 mi/h (8 to 16 km/h) when speed limits were lowered. Because there were few changes in the speed distribution, it is not surprising that the overall effects of speed limit changes on accidents were minor. It is interesting to note that compliance decreased when speed limits were lowered and accidents tended to increase. Conversely, when compliance improved after speed limits are raised, accidents tended to decrease”*.¹⁴
- 9.40 This is a road safety issue now as cars struggle to pass pedestrians with oncoming traffic both ways as they pull out into the middle of the road to overtake. This danger would be increased with the increase of vehicles from the proposed development.
- 9.41 Please also note the importance of Uckfield Hospital and associated Ambulance Station which require clear access onto Framfield Road.
- 9.42 It was pointed out by a resident that *“all three appeal schemes were considered unsustainable in transport terms because they would lead to an undue increase in traffic congestion in Uckfield and in use of the private car.”* No positive case has yet been put forward for a sustainable solution and they pointed out that the three schemes would be contrary to national, regional, SP and local policies and guidance.
- 9.43 There just seems to be an overall assumption that all traffic will turn left into Uckfield. No consideration has been given for the rural lanes and rat runs such as Sandy Lane. And if there's an increase in the number of bus stops, this will not only cause issues with congestion, but also safety issues.

10.0 Ecology of the site

10.1 Ancient Woodland

Reference is made within the associated reports to the application of the ancient woodland and that Croudace will seek to preserve this.

- 10.2 *“Ancient woods are our richest and most complex terrestrial habitat in the UK and they are home to more threatened species than any other. Centuries of undisturbed soils and accumulated decaying wood have created the perfect place for communities of fungi and invertebrates”* – Woodland Trust and the impact to the ancient woodland in the BIES area cannot and must not be underestimated.
- 10.3 Defra's Magic Maps also highlights that the lower section of the site has been party to English Woodland Grant Schemes, Grant Scheme 3 in particular. The Woodland Grant Scheme (WGS) provided incentives for people to create and manage woodlands on sites all over Great Britain. The

¹⁴ <https://www.ibiblio.org/rdu/sl-irrel.html>

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Forestry Commission paid grants for establishing and looking after woodlands and forests. To qualify for grant the applicant had meet the standards of environmental protection and practice set out in the Forestry Commission's guidelines. WGS3 was operative from October 1994 until its closure to new applications in June 2004.



- 10.4 Need to assess planning applications for likely impacts on SSSIs/SACs/SPAs and Ramsar sites
Defra also clearly highlights that a section of this site needs to be assessed closely for any likely impacts on SSSIs/SACs/SPAs and Ramsar sites. Here we are particularly concerned about the SSSI of Buxted Park.

Bird in Eye Farm was once part of the Buxted Park estate. The designation of an SSSI for Buxted Park estate was given in 1989. See below.



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- 10.5 The impact of further development along the streams/rivers and waterways and ancient woodland surrounding BIES, Framfield Road, Mallard Drive will have a profound effect on the eco system that has for thousands of years successfully been sustained in this area.
- 10.6 The creation of SANGS is **no substitute** for replacement of areas of undisturbed soli and thousand year old eco systems.
- 10.7 Character of High Weald
A local ecologist has confirmed that the terrain on this site has the characteristics of the high value High Weald landscape.
- 10.8 There is also a post-glacial ghyll on the site along the shaw between the proposed siting of the houses and the ancient woodland. These ghylls take hundreds and thousands of years to produce and any such location of development will have a substantially detrimental impact on the ecology of this site.
- 10.9 Uckfield sits towards the south of the character area which is considered to be rich with woodland, shaws, gills, small fields and hedges – similar traits to the National Character Area of the High Weald – 122.



The setting of National Character Area High Weald – 122, in East Sussex

- 10.10 It is disheartening to see that the Archaeological report is purely desk-based. The history of Uckfield particularly with the Streafields, and Buxted Park (which Bird in Eye Farm was linked to) has a scheduled monument, and medieval settlement site (old village of Buxted), more work is required to understand the importance of the archaeology and history of this site before any development takes place.

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10.11 Wildlife present on the site

In addition to the common birds and wildlife found on agricultural land and green fields, it is recorded that there is a high population of lapwings on the site.

10.12 'Over the last 40 years, show a decline in farmland birds of 56%, with turtle doves declining the most rapidly - down 96% since 1970. Other species under pressure include skylarks - down 62% since 1970 - and lapwings which are down by 50%.¹⁵

10.13 Lapwings are now in the 52 named birds on the red list of birds which are now of the highest conservation concern. Framfield Road/Bird in Eye shows this area to be priority species for CS targeting.¹² Lapwings breed between mid-March and July and nest on spring tilled arable land or on short grassland – (grazed) and walk their chicks onto grazed pasture to feed.

10.14 Turtle doves have also been noted as prominent in this area according to Defra's Magic Maps.

10.15 Dormice

Since 2000, the population has fallen by a half (51%), decreasing on average by 3.8% per year. In Britain dormice are threatened, qualifying as 'Vulnerable' to extinction under Red List criteria. Dormice have also been confirmed present within Woodland 1 and Hedgerow 2 in the north-east of the Site.

10.16 Impact of footpaths through ancient woodland/shaw

It has been noted that the walk has been increased through a six-metre wide section of a third party owned woodland. With this woodland and the walk through the shaw, there are concerns that walkers and dogs will be travelling through the ancient woodland and potentially impacting the flora and fauns, of this parcel of woodland.

10.17 Impact on hydrology through the shaw and woodlands

Uckfield Town Council is also keen to understand if consideration has been given to the proposals and their impact on the shaw and woodlands. Much of the integral parts of these areas, have lived without water hydrology and any changes could impact on the existing habitats.

10.18 Impact of street lighting on sites with rich biodiversity

There is currently no street lighting from the bottom of Framfield Road through to Framfield. This whole area is diverse in ecology including Bats, Dormice, Grass snake and common lizard populations, badgers and deer, the placement of street lighting will have huge potential consequences on a profound range of species especially nocturnal wildlife which will in turn affect other areas of the ecological system in an area that has been farmed and in tune with natural cycles of light for thousands of years. The Framfield Stream as a direct subsidiary to the River Uck meanders all along the boundary of the BIE development and is protect by ancient tree and hedgerow boundaries.

¹⁵ <https://www.bbc.co.uk/news/science-environment-29728558> ¹²
Magic.defra.gov.uk /TN22 5AH

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- 10.19 The detrimental effects of street lighting in areas of diverse ecology and along minor roads are documented as:¹⁶
- Implications of night lighting on amphibians.
 - Artificial night lighting is linked to the reduced activity of the common and widespread bat species critical to ecosystem function.
 - Horseshoe bats also show clear avoidance of light throughout their roost sustenance zone.
 - The impacts on other rare species, including Bechstein's, barbastelle and grey long-eared bats are yet to be investigated, but negative associations are expected based on known associations for species in the same functional guilds.
 - A precautionary approach that minimises the amount of artificial light entering the environment is therefore justified.
 - The use of LED lighting along watercourses should be minimised given the impacts on Daubenton's bats and their prey.
 - Although not specifically tested in this programme, the precautionary principle would suggest that other types of lighting should also be avoided wherever possible
 - Lighting in close proximity to waterways, particularly those with substantial treelines, has a major impact on their use by horseshoe bats, and should be avoided in important areas for the conservation of these species.
 - Greater horseshoe bats rarely use major roads, the lighting of minor roads with good tree and hedgerow boundaries has a profound negative effect and should be minimised.

11.0 SANGS (Suitable Alternative Natural Green Space)

- 11.1 Whilst the SANGS is a planning requirement, it does not mitigate the loss of open green space for wildlife. Essentially it becomes a dog walking site and needs to be maintained. Experience can be taken from the SANGS at Horsted Green Park:
- people will want to drive to access the SANGS (*few people access the Horsted Green (HG) SANGS by foot and the small car park provided has been shown to be completely inadequate for this reason*). It was quoted in an article in Uckfield News in December 2020, that there were up to 6,000 movements per month;
 - Many of the trees planted at Horsted Green Park have died as there is not an ongoing management plan in operation for watering etc and some have been damaged by vandalism, therefore these trees are not mitigating the loss of similar at the build of Ridgewood Farm;
 - Surface water drainage has been an issue and pathways have been destroyed and need constant repair due to the nature of the site and high topography;
 - Dogs on the site running free have a huge impact on wildlife an ecology and this will impact on the wildlife already present at BIE;
'significantly more residents visited SANGS and travelled significantly further than the 5km threshold . Significant numbers of participants did not visit their nearest SANGS '¹⁷
- 11.2 We therefore do not feel Croudace have fully considered vehicle movements to the SANGS from people within Uckfield and Framfield parishes who don't live on the site, nor the area's use of Ashdown Forest.

¹⁶ *The biodiversity impacts of street lighting.pdf*

¹⁷ *The role of SANGS in protecting high value wildlife sites – Allinson E. – University of Southampton.*

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11.3 Management of the SANGS is also a consideration. Uckfield Town Council feels that the proposed management plans for the SANGS and protection of adjacent rich biodiversity should be submitted to the local planning authority before the SANGS can be declared suitable.

12.0 Domestic cats

12.1 'Biodiversity loss is one of the most pressing contemporary global crises.¹⁸ It is also well established that free ranging cats pose a significant threat to biodiversity conservation and restoration worldwide' ¹⁹

12.2 Wealden District Council have recently set a precedent regarding domestic cats as predators. They have refused permission for the change of use and conversion of the Foresters' Hall in Nutley to a domestic dwelling. One of their overriding reasons was the impact that domestic cats would have on the Forest. WDC considered the potential risk from just **one** household with a cat (or cats) and BIE has **290** potential homes. Cat ownership in the UK is 16% of households¹⁶ This would mean that there would potentially be at least 50 cats on the development, presuming that a few owners would have more than one pet. The ecology of the area, including that in ancient woodland, would be seriously and irreversibly effected by these non-native predators.

13.0 Flooding protection and drainage

13.1 Uckfield is well known particularly from the floods of 2000, the potential for flood risk. Residents were rescued in lifeboats, and all villages along the River Uck and through the Ouse valley towards Lewes, were badly impacted.

13.2 Although following this severe flooding incident, flood risk management plans were put in place, existing documentation has not been updated since 2016. Each winter Uckfield Town receives on average five to six flood warnings (not just alerts), and properties and businesses down from the Forest through Buxted, the floodplain and through Uckfield, down through to Barcombe and on to Lewes have to sit on close watch, concerned for their property and livelihood. In the last two to three years, these warnings have become more frequent and much more concerning. Framfield Stream floods more rapidly than the river.

13.3 The Croudace proposal does not seem to take into consideration the flood risk in the area because the flood risks are to the western side of the development down a steep gradient. However the lower end of Bird in Eye Hill floods on numerous occasions every winter and any further impact of concrete surfaces and speed at which the heavy rain or surface water runs off the new tarmacked pavements and roads of the developments will increase the speed at which the Framfield Stream floods at the bottom of Bird in Eye Hill, risking a number of properties and businesses in its wake. Croudace would be looked at to not only mitigate the risk substantially, but it could also fall to the management company that takes on the open spaces of the site, in addition to the residents who contribute financially to that management company to keep addressing the impact of heightened speed and surface run-off into the Framfield Stream, when initial mitigation measures fail to work.

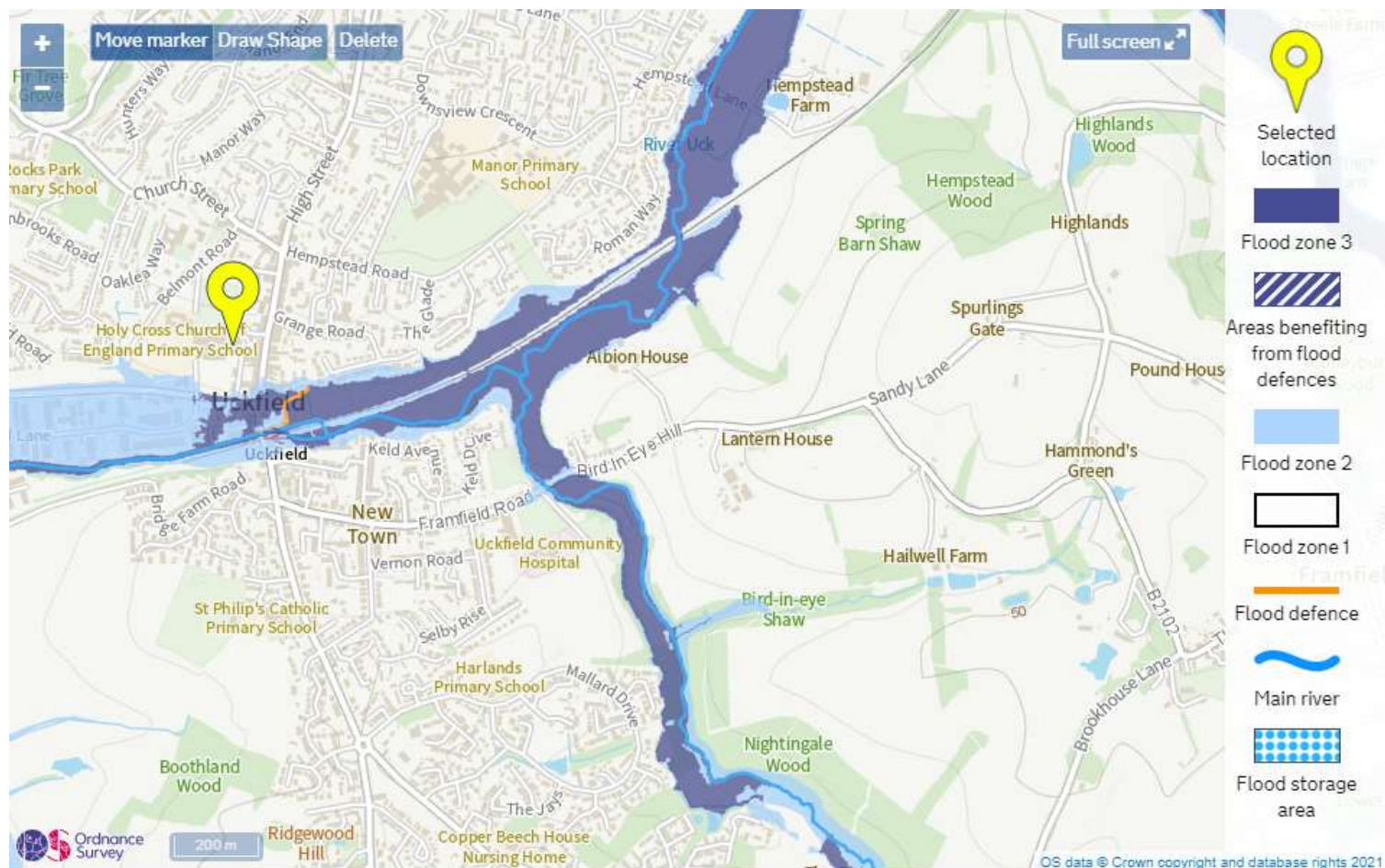
¹⁸ PBES, 2019

¹⁹ *Domestic cats and their impacts on biodiversity: A blind spot in the application of nature conservation law* ¹⁶
Source – Statista.com).

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13.4 The UK Government website illustrates the flood risk in Uckfield as follows:



- 13.5 Framfield Stream carries the run-off from this site into the River Uck, and is species rich including salmonids and other scarce species such as Lamprey.
- 13.6 Each new proposed development is being looked at by Wealden DC and East Sussex County Council (Drainage), and the Environment Agency in isolation and this is not sustainable.
- 13.7 This BIE development intends to use attenuation ponds to drain off surface water. This will feed directly into the Framfield stream. This stream already floods at the back of the houses in Eagle Close and at the bottom of Fernley park and was until recent transfer of ownership under a court order for the riparian owner to dig out and clear the stream twice a year. In the winter the area at the bottom Fernly Park and Eagle Close and over the stream from Nightingale Woods is waterlogged and backs up to Mallard Pond. The Framfield and Ridgewood streams feed into the River Uck which has a history of annual flooding at Hempstead field and Olives Meadow. The junction at the hospital turning floods repeatedly during the winter and at the bottom of the hill is a road safety issue made worse by freezing and ice.

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- 13.8 The Mallard Drive development will release water from attenuation ponds at a rate of 57.7 litres per second into the Framfield Stream, and the initial proposals by Croudace are considered not adequate for management of surface water.
- 13.9 Developments at Eastbourne Road, Ridgewood House, Horsted Pond Farm all plan to have attenuation ponds releasing water into the Framfield and Ridgewood streams, which all feed into the same place – the River Uck. All the attenuation ponds will release water into the stream at the same time i.e. when they are all full due to high levels of rainfall. This will have an effect on the flooding at BIE hill and in River Uck and will cause flooding and misery to shop and home owners in Uckfield but potentially increase the flood risk to Lewes as River Uck flows directly into Rive Ouse.
- 13.10 The UK's climate is becoming wetter. ²⁰ *'the highest rainfall totals over a five day period are 4% higher during the most recent decade (2008-2017) compared to 1961-1990. Furthermore, the amount of rain from extremely wet days has increased by 17% when comparing the same time periods. In addition, there is a slight increase in the longest sequence of consecutive wet days for the UK.'*
- 13.11 Climate change has increased the risk of floods in England and Wales, such as those in Autumn 2000 (the wettest Autumn on record), by at least 20% and perhaps 90%.
- 13.12 Below is a map showing the modelling land projected to be below annual flood level in 2050 ²¹. This will impact the streams and tributaries to the river Uck and Rive Ouse which will impact on Uckfield and surrounding areas and cause population displacement.
- 13.13 And with sea water rising, river lengths will be reduced so less flood water will be able to escape, unless developments stop building on flood plains.



- 13.14 The East Sussex Emergency climate plan acknowledges the predicted impacts of climate change in East Sussex include more frequent and intense flooding, ²²

²⁰ UK State of the Climate report

²¹ <https://coastal.climatecentral.org/map>

²² <https://www.eastsussex.gov.uk/media/15770/escc-climate-emergency-plan-june-2020.pdf>

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14.0 Climate Change

- 14.1 Wealden already produces 47% of its emissions through traffic and 35% through housing, how can it be acceptable that this is to be increased again and again.
- 14.2 Uckfield not only absorbs the New Builds in Uckfield, it also is the gateway for the new builds from Hailsham, Polegate, Horsebridge etc. On a wet Monday morning in September it can take 20-25 minutes to get from the Highlands roundabout into town joining the queue of vehicles coming out onto Framfield Road, sometimes the same at lunchtime on a dry weekday morning and hours when the bypass is blocked with accidents, roadworks, hedge cutting or construction lorries.
- 14.3 So how much carbon emission is being produced by stationary vehicles, sitting in traffic jams up and down the town at least twice a day?
- 14.4 The carbon footprint of building a new two bedroomed house has been calculated at 80 tonnes (over eight times a UK citizens' current average annual footprint, which has to be reduced by 80 per cent by 2050).
- 14.5 New homes need maintaining, as does the infrastructure associated with them: streets, lighting, electricity, sewers, gas and telecommunications etc. They need to be kept warm or cool. And every new house requires carpets, curtains, furniture, electric goods and endless other items.²³
- 14.6 None of the housing on the BIES development proposal are a 'eco-friendly design' and all are EPC category B. The use of gas boilers in all properties which will need to be replaced by 2030, no provision for electric car points, solar panels, heat source pumps. This is contrary to Wealden DC's climate emergency plans to become a net-zero carbon District by 2050.

15.0 Fresh Water supplies

- 15.1 We live in a 'water stressed area' where will all the fresh water come from for all these new dwellings?
- Average per person per day =142 litres of water
 - Average household = 349 litres of water each day. ²⁴
 - This equals an extra 349,000 litres per day for Ridgewood Place, 31,410 litres per day for Eastbourne Road, 41,531 litres per day Mallard Drive = 421,941 litres per day already for the houses that have got planning permission. BIES would bring that total to 516,171 litres of fresh water per day required in Uckfield alone.
- 15.2 How can this possibly sustainable when there are no extra reservoirs in Wealden being built in the area and Hailsham, Crowborough and surrounding areas are building in equal to greater amounts. If a new reservoir is built it might not happen for ten to twenty years.

²³ <https://www.thelandmagazine.org.uk/articles/why-building-more-houses-not-answer>

²⁴ <https://www.energysavingtrust.org.uk/sites/default/files/reports/AtHomewithWater%287%29.pdf>

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Groundwater Vulnerability Map for Bird in Eye Farm is 'High'

- 15.3 The Groundwater Vulnerability Maps show the vulnerability of groundwater to a pollutant discharged at ground level based on the hydrological, geological, hydrogeological and soil properties within a single square kilometre.

16.0 Population and Housing

- 16.1 The revised Local Plan now being worked on will use the housing requirement suggested in the Planning Inspector's (refusal) report, of 1,231 new homes per annum throughout Wealden, and "carefully consider and test the potential unmet housing needs of neighbouring planning authorities".²⁵

Wealden DC are planning to see the delivery of nearly three times more dwellings than their nearest neighbours.

Adopted Local Plans (adoption date) Number of dwellings over plan period
Eastbourne: Core Strategy Local Plan (February 2013) 5,022 (2006-2027) 239 p.a.
Hastings: Hastings Planning Strategy (February 2014) 3,400 (2011-2028) 200 p.a.
Lewes: Joint Core Strategy (June 2016) 6,900 (2010-2030) 345 p.a.
Rother: Core Strategy (September 2014) 5,700 (2011-2028) 335 p.a.
Wealden: Core Strategy (January 2019) 14,228 (2013-2028) 949 p.a.

Population change 2019-2023 – increase of 12,170 (8.4%) people over 65
4.3% East Sussex population will be over 85yrs (greater than the 2.7% proportion of England) therefore ranking East Sussex 2nd highest proportion population for 85 yrs compared to a 1.5% increase of 18-64 yr olds.⁸

²⁵ <https://uckfieldnews.com/why-wealden-has-problems-with-housing-landsupply/#:~:text=Housebuilding%20land%20within%20Wealden%20is%20in%20s>
hort ⁸ State of the county report: East Sussex 2019:

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- 16.2 And yet there is no provision on the development for elderly and support services e.g. assisted living. Bungalows are not being built or what was previously referred to as lifetime homes – homes easily adaptable for a range of abilities and age groups. In fact, a 64 bed nursing home was refused by WDC 02/08/21WD/2019/2466/MAJ in Coopers Green siting:

“The development is proposed on the side of the road which is very open in nature, and contributes to the rural setting of the locality. The size, scale and mass of the building, along with the crown roof style design, would be highly noticeable and dominant within the street scene, and would erode this open rural setting. As such, the development, and would be detrimental to the visual amenity and character of the surrounding area.

To buy

- 2018 – median house price in East Sussex is £278,500
This is ten times the average salary of £28,746 compared to England = £239,000 8 x salary of £29,869
- **Wealden** -Average House Price £377,858 = gross income of £86Kpa and a deposit of £75K to buy

To rent

- Average rent in Wealden = £900
Studio - £550
1 bed -£695
2bed - £850
3 bed -£1075
4 bed -£1563

And this has increased further since the covid pandemic, with local estate agents absolutely inundated with enquiries from people looking to move to the countryside and coast following a change in working patterns and risk of infection.

- 16.3 A couple earning £50,284 gross (take home pay £3143) = a 3 bedroom house would take up more than one third of their salary.

- Private Rent = Gross Income of £46Kpa

- 16.4 The average wage in Wealden = £28.4k (female) £35.3k (male) – these large housing developments which start their property values at £350/375,000 are not sustainable for for residents in the county.

- This year 640 households on the Housing Register
- In 2019/20 there were 347 lettings by the Council or Housing Associations.
- 50% of applicants need 1 bedroom but 18% of stock is 1 bedroom
- 18% of applicants need 3 bedroom but 31% of stock is 3 bedroom.
- Therefore, mismatch between needs of qualifying households and supply.
- Affordable housing delivery - 2019/20 -275 2020/21 - 197

- 16.5 Whilst 35% of BIES proposed development is ‘affordable housing’ the other houses planned for the development to not meet the requirement for housing required by local residents. This in turn means residents will be brought into the town who are likely to have jobs away from the area putting further strain on Highways.

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16.6 Temporary accommodation in Wealden

- The Domestic Abuse Bill is currently going through Parliament. When this becomes an act there will be a new duty to accommodate anyone who is fleeing violence/abuse, or a threat of violence (currently the Council's duty regarding DA victims extends only to those with children, or with significant vulnerabilities, like a disability, or substance use issue).
- There is no provision at BIE or other developments to meet the needs of all individuals who approach Wealden Council as homeless, or at risk of homelessness, especially as there will soon be a new category of people who will need homelessness assistance.
- The duty of the Council is to provide all these individuals with safe, temporary accommodation - many of those who are given TA will then go on to be accommodated in long-term Council or Housing Association accommodation through the housing register. ²⁶

16.7 Therefore Uckfield Town Council is not opposed to development, but opposed to the types and lack of variety of properties being built for a range of needs and range of income levels.

17.0 Sport and leisure

- 17.1** The south of Uckfield has one recreation ground on Mallard Drive and a village hall and recreation ground on New Road. The only leisure centre is in the North of the town and the lease agreement for this is currently out for tender. Facilities are incredibly limited in the south of the town.
- 17.2** The Town Council own Victoria Pleasure Ground which has two tennis courts, two football pitches, a cricket pitch and MUGA and a children's play area, but the play area is in need of upgrading, and the cost to renovate the football pitches year on year is high, with the need for further enhancements here also.
- 17.3** Currently all sports pitches in Uckfield are over-subscribed and there are no easily accessible sports or leisure facilities adjacent to BIE. No approach has been made by Croudace to understand our needs prior to making the application for outline planning permission and neither have they spoken to us about linkages to existing spaces. Another play area and a SANGS is quite frankly non-adventurous and the bare basics of what a developer has to be provide.
- 17.4** Vehicle access (lack of footpaths and cycle routes) would be the choice of residents in BIE attempting to reach Ridgewood Village hall and recreation ground, Victoria Pleasure Ground and Freedom Leisure all of which would mean access through the Framfield junction into town. Freedom leisure is 1.25miles away from BIE and Victoria Pleasure Ground is 0.4 miles away via the dangerous Bird in Eye Hill.
- 17.5** Plus developers always look to the Town Council to manage and maintain the play area after the developers have left the site, or expect residents to contribute to a management company.
- 17.6** Allotments are a statutory provision for the Town Council. The Town Council may have five to six sites already but these heavily over-subscribed and there are over 100 people on the waiting list.

²⁶ Councillor A Smith UTC

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18.0 Play areas

- 18.1 As part of the planning requirements all the proposed developments are placing play areas onsite and there is a presumption that Uckfield Town Council will adopt these play areas.
- UTC play areas currently have a maintenance budget of £3k which is usually overspent to repair, replace and deal with vandalism;
 - The latest play area at Luxford Field cost UTC £161,522.45 to install;
 - It is simply not financially viable to take on all the play areas planned for the proposed developments in Uckfield on the limited budget that UTC has to oversee all the needs of residents in the town. UTC cannot continue to support the upkeep of play areas from all the new developments as this would mean a substantial rise in council tax precept to cover costs;

19.0 Community space and facilities

- 19.1 Currently space is provided at BIE Farm, in their outside buildings for business purposes including dog groomers, osteopaths, beauty therapy, livery stables, a local radio company etc.
- 19.2 There is a chronic shortage of rentable spaces in Uckfield for small businesses
- 19.3 The grazing land for horses will be built on therefore reducing the much needed grazing and Livery service that is under threat due to developments in this area.
- 19.4 There is no proposal for a community building at the development, the nearest community buildings are:
- Foresters Hall – owned by UTC which is over subscribed for hiring and 0.5miles away and has no space for parking as local residents utilise the space daily;
 - Ridgewood Village Hall - 1.27miles – leased by RVH management committee and over subscribed for hiring;

20.0 Supermarkets

- 20.1 Whilst the high streets all over UK are in crisis due to lock downs and covid closures the supermarkets and food chain supply are struggling to meet demand due to Covid and Brexit.
- Uckfield's Tesco (we believe) has recorded in the past one of the highest sales per square foot in the country;
 - Uckfield has one small Tesco and Waitrose both of which are at capacity in terms of car parking space and food provision;
 - Home shopping deliveries are being made from alternative sites (some as far as Eastbourne);
 - This is before the 1000 houses are completed at the Ridgewood Farm site, and those at Eastbourne Road, and Mallard Drive.

21.0 Healthcare and schooling

- 21.1 This development will put further strain on healthcare and schooling facilities in Uckfield which is already struggling to support the residents living here now.
- All GP surgeries are at capacity. The nearest surgery to the BIE development is at the hospital and this will be put under further strain by the residents of the Mallard and Eastbourne Road developments of 209 dwellings due to their close location.
 - NHS dental practices in Uckfield are no longer registering new patients
 - Primary school places are at a premium and Harlands School is at capacity. The only school in the whole of Uckfield with some capacity is Holy Cross Primary School and they are located right in the centre of town, next to Holy Cross Church and would therefore encourage parents to drive to drop their children to school and collect after work.

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- There have been no plans confirmed for a new primary school in Uckfield, although Welbeck Strategic Land are required by the S106 agreement to put the facilities in for one. However this could not be supported by East Sussex County Council, it would need to be a 'Free school' (funded by the government but not run by a local authority);
- Uckfield College has been rebuilt with the same footprint and pupil spaces as before, with no allowance for growth in the number of students, despite potentially 3-4,000 more houses being developed on the periphery of Uckfield in the next five to ten years.

21.2 References made by Croudace to local nurseries and schools also needs updating. Possibly taken from desk-based research shows how poor this type of exercise is. Reference is made to Uckfield Grammar School. It still shows up on a google map, but closed in 1930 and one of the nurseries mentioned in the transport report no longer exists.

22.0 Utility Infrastructure

22.1 Uckfield Town Council understand that to support the development at Bird in Eye Farm, further works would be required to link up power and utilities. This would require potentially another 12 to 18 months of upheaval for the town as works would need to be completed along the very narrow Framfield Road for UKPN to connect the site to the new utilities works that has been run through the centre of Uckfield High Street, New Town and Lewes Road providing utilities to Ridgewood Place from a spur at the crossroads with Framfield Road, Forge Rise and the London Road

22.2 Sewage capacity is also limited, and Uckfield's residents need to understand that these issues have not been fully considered by the developers with the relevant utility companies. Even Southern Water themselves have responded to advise from a basic desk top survey, that there is the *"increased risk of foul flooding, due to the impact of the development on the existing public sewer network."* They have suggested that any development would need to be carefully phased to enable Southern Water to increase capacity and ensure adequate wastewater network capacity is available. They also highlighted that *"construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal be submitted."*

23.0 Employment

23.1 Residents are being told to expect another 4000 houses to be built in Uckfield alone and a possible further 20,000 houses to the West of Hailsham on top of the excessive house building going on throughout Wealden. Uckfield had 6500 houses at the last census so this could result in two thirds growth to the town.

23.2 Currently as far Uckfield Town Council are aware there are plans to extend the industrial estate once the final plot of Welbeck land is sold at Ridgewood Place which could take up to 10 years. Whilst in the short term the building of houses will offer work both to construction/utility companies and to supply chains there is not the scope to supply work for this amount of residents moving into Wealden and specifically Uckfield. All work and transport models being used are outdated following Covid – 19.

23.3 The job market has been irrevocably changed following the impact of Covid and the change specifically of shopping habits, travel and further use of AI especially in warehouse and delivery settings. The UK Government's plans to 'level up' work opportunities in the civil service and possibly locate some government departments to York which will have a huge impact on job opportunities in the South.

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- 23.4 The collapse of the airline industry due to Covid and the expectation that it could be 5 years and beyond before Gatwick airport recovers from this will reduce job opportunities in the whole of the South East.
- 23.5 It is essential that discussions take place with relevant trading bodies e.g. Uckfield Chamber of Commerce to have a detailed look at work opportunities in the future for new residents before more developments such as BIES are forced upon the town. Short term gain from building large scale developments will not be sustainable in the long term and the economic impact on Uckfield, Wealden and surrounding towns and villages will be profound.
- 23.6 The National Planning Policy Framework clearly sets out
'to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'
- 23.7 Therefore until the industrial site is completed on the Ridgewood Farm Estate, economic growth and improved productivity is not sustainable with this and the other developments currently being considered by the local planning authority.
- 23.8 Please note - references within Croudace's documentation need updating:
"Bird in Eye Farm provides several commercial services including amongst others, a vehicle repair centre, butchers, beauty salon and a taxi service. These uses will remain post development and will be accessible to future residents, further enhancing the application site's sustainability".²⁷ - there is no longer a butcher on the farm.

The information provided to show proximity to certain places of employment in Uckfield Town Centre is also out of date, with a number of those businesses now changed or closed down.

²⁷ Land at Bird in Eye Farm, South of Bird in Eye Hill, Uckfield: Framework Travel Plan

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24.0 Questions

- What is the plan for a Southern Road in Uckfield;
- What is the planned model for Framfield Road;
- Current highway infrastructure is simply not sustainable for another 4000 houses that UTC are being told are coming to Uckfield;
- The chaos being caused in the town and impact on shops and business for the Utilities to Ridgewood Place would take place again if a spur is taken along Framfield Road for BIES
- Since the statement by the secretary of state the situation for congestion, highways access, infrastructure and utility provision has deteriorated to such an extent that further large scale developments within Uckfield will be detrimental to health, the ecology system and the environment AND put business and housing at greater risk of flooding.
- Without a local plan how will any proposed developments be capped whatever their detrimental impact and sustainability?
- Who receives the CIL/S106 monies – Framfield PC should and we would support that as it's within their parish, but Uckfield should benefit also due to the close proximity of the development and use of all of Uckfield's services and facilities.

This research report provides clear reasons why the following comment made by a senior officer at Wealden DC is refuted:

'That the proposed development will have no significant impact upon relevant natural resources and any waste, pollution or hazard associated with the development scheme can be effectively controlled by conditions and/or s106 Legal Agreement. The Council is satisfied that the development of this site will not cause any significant loss of valuable agricultural land, will not impact upon any area of flood protection and will not compromise or undermine any acknowledged asset of natural, ecological heritage, landscape or cultural value within the site vicinity'.²⁸

²⁸ SR/WD/2021/6504/SO Mr S Robins 17 March 2021 SB/JS/7336