

Submission to planning inquiry

WDC Ref: WD/2021/2198/MAO

PINS Ref: APP/C1435/W/22/3307820

To whom it may concern,

My name is Duncan Bennett.

I am a resident of Framfield Road and live very close to the Framfield Stream.

I have had a long held interest in meteorological matters and their impact upon flooding in the local area.

I have also served as one of Uckfield Town Council's Emergency Coordinators for most of the past 23 years.

During this time, I have been involved in discussions pertaining to flood risk and management, as well as preparing local responsive reactions to flood events.

I am also the founder and administrator of the River Uck and Surrounding Areas Flood and Extreme Weather Group on Facebook, which aims to provide information and advice regarding weather related issues.

It has become a useful repository for data and photographic / video records which document weather and flooding events in recent years and I would urge you to look back at its archives.

<https://www.facebook.com/groups/UckfieldIssues/>



Flooding is nothing new in Uckfield's history.

In fact, as a recurring problem, it has led to the town becoming the subject of a number of educational case studies used to teach students about flooding.

The town first became popular as a fording point across the River Uck for travellers moving south through the ancient Forest of Anderida (Ashdown Forest today) to the Coast.

Our ancestors knew that the forces of nature were powerful and so mainly began the building of our town upon higher ground above the flood plain.

As the population grew, more properties were built at lower elevations, a trend which was accelerated with the coming of the railway, which used the flat lands of river flood plains as easy routes for construction.

The growth of the town saw the detrimental encroachment upon the floodplain, which is now obstructed by the Lower High Street, Bellbrook Industrial Estate and a number of other commercial and residential properties.

The town has had to cope with numerous flood events over the course of history with the flood plain above and below the town often seen performing its duty during any given year.

In more recent times and following the devastating major flooding of 2000, a flood defence wall was built around the car park of the Waitrose supermarket, which was proposed to protect the High Street from the regular low-level events which have often troubled the town.



The town centre flood defence has been activated on a number of occasions, most recently on 3rd November 2022.

Many local people are questioning what the potential effects are of holding back the flow of the river in spate at that location and conjecturing that protecting the town centre could be to the detriment of others upstream of the defences.

The town centre itself is often the victim of two very different types of flood event.

Fluvial and rainwater runoff.

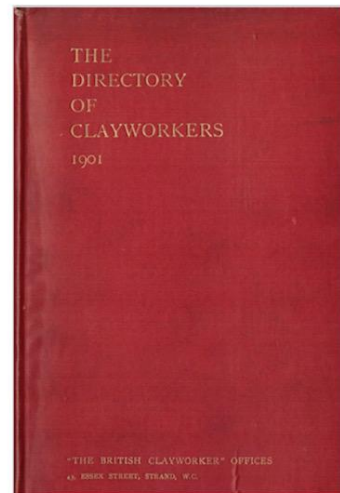
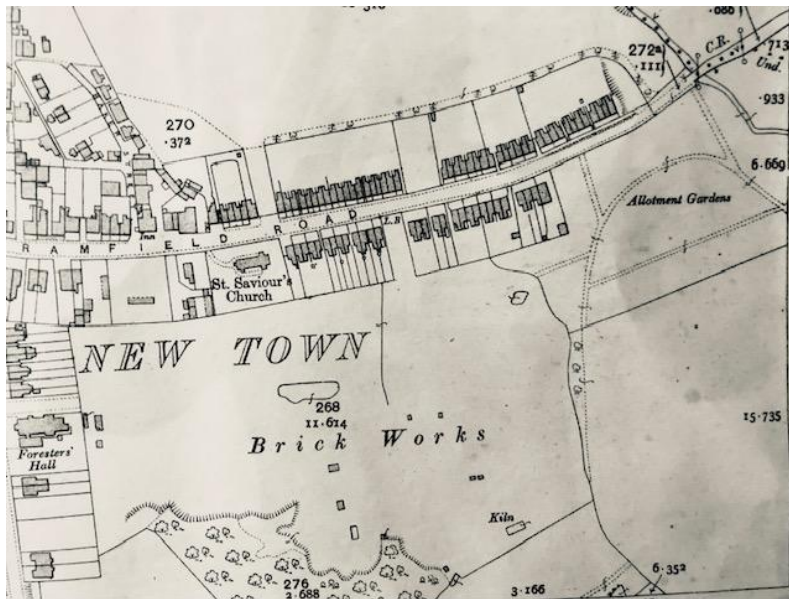
The fluvial events are resultant of particular geological and topographical factors.

Uckfield is at the transitional point between the High Weald, (with its steep ghyll valleys and open catchments, where runoff rates are large in quantity and move extremely quickly) and the low Weald, where watercourses take a more leisurely track towards the sea, through low level pastures which act as flood plains.

The topography of Uckfield is notable for its high undulating landscape with rocky outcrops and steep-sided sloping ghyll valleys, which are usually the location of spring fed watercourses which can turn from a trickle into a torrent very quickly during and after rainfall.

The geological nature of the area is that we sit on a huge reserve of Wealden Clay, overlying Sandstone Beds.

This geology has been exploited by previous generations, who quarried the rock for construction and dug the clay for brick and tile making, an industry which Uckfield was duly proud of and brick fields were a frequent sight in the Town, with old 20th Century maps showing a brick field and works operated close to the application site, near to what is now the Uckfield Community Hospital.



Tyhurst & Son, The Uckfield Brick Works, Uckfield, Sussex, Red Facing, Clamp, Paving, Ornamental, and String Bricks, Roofing, Weather, and Paving Tiles, Agricultural Drain Pipes. T. add.: "Tyhurst, Uckfield."

(Left) Map showing close proximity of the former brick clay fields and works of Tyhurst's
The appellants site is the other side of Framfield Stream (Northeastern corner of map)
(Right) Excerpt from the 1901 Directory of Clayworkers -Tyhurst's were just one of the brickmakers in the area.

This clay exhibits properties which exacerbates the problems with runoff.

It generally has a thin topsoil covering, which soon becomes inundated.

The clay beneath becomes dry and impermeable in dry spells, causing accelerated runoff in initial rainfall events.

The clay then absorbs water until it becomes quickly saturated, again meaning that it accelerates runoff.

The following images were taken shortly before construction began upon the Mallard Drive estate extension a couple of years ago.

This location is at high elevation comparable to that of the application site and situated but a few hundred yards away above the Western bank of the Framfield Stream.

I can see no reason why this geology, so typical of the Uckfield area, would not be similar to that of the nearby application site.









(Note the newt/amphibian - reptile fencing washed away)

You will see that the above pictures show an inundated landscape, where the clay subsoil is incapable of absorbing any further water and this is simply pouring off of the field towards the valley and stream below. This was following unexceptional rainfall.

Across the town as a whole, rainwater runoff has been the cause of many non-fluvial disasters for businesses and homeowners, with frequent inundation occurring at the bottom of the High Street, Nevill Green and Barnett Way among others.



Uckfield High Street 19th July 2021



Closer to the application site, Framfield Road at the foot of Bird In Eye Hill is frequently the scene of runoff inundation, with water pooling at the bottom of the allotment site and quantities of groundwater pushes up with such force upon emerging from an adjacent British Telecom duct that it often lifts the large concrete inspection cover in escaping from the underground chamber and undermining the adjacent pavement..

Upon speaking to engineers, despite numerous attempts at repair, they are stumped as to how to resolve the situation, as they say the groundwater ingress issue is problematic all the way up Bird In Eye Hill.

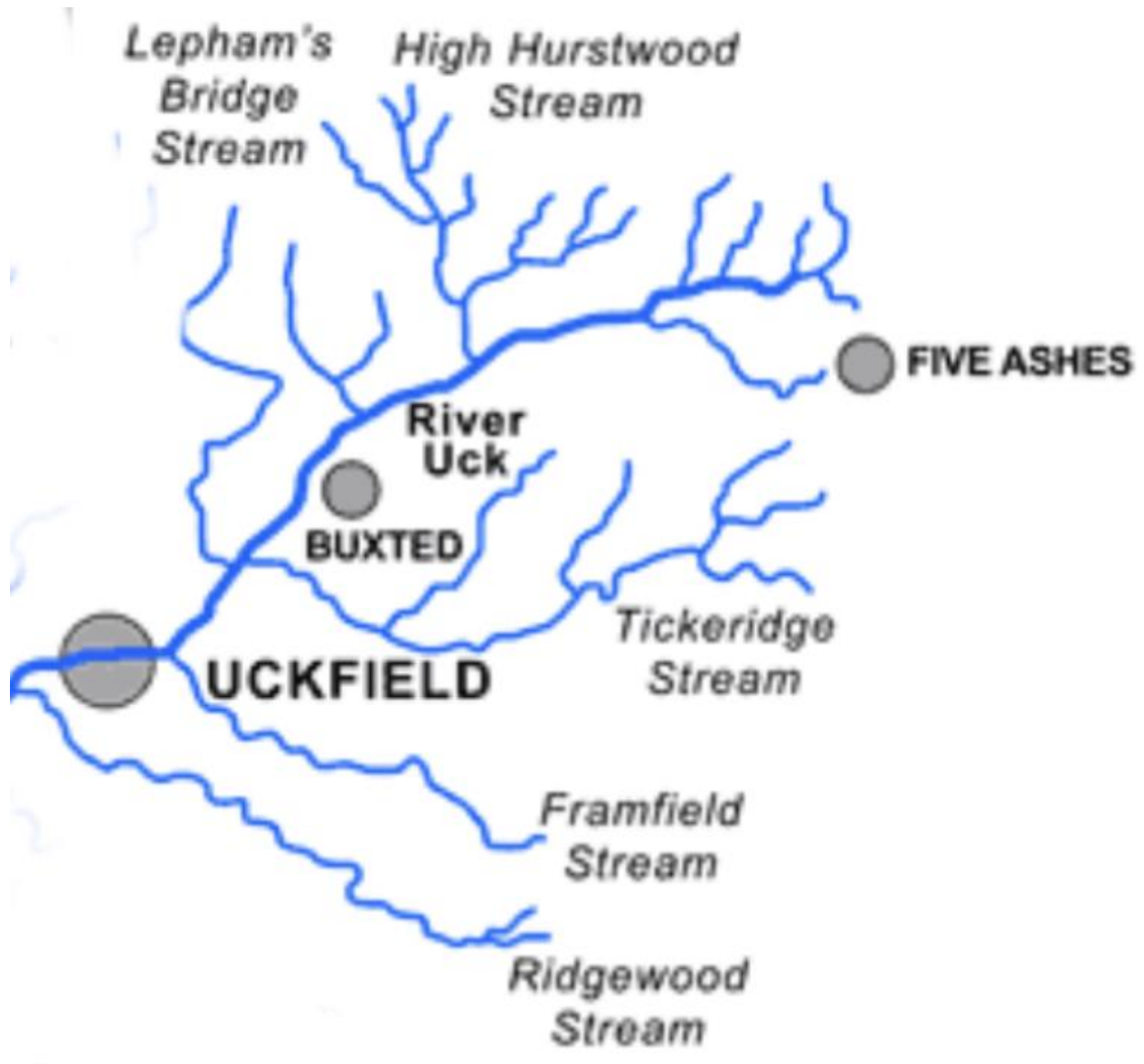


Following the recent construction of the Persimmons Homes Mallard Drive Estate extension and despite numerous assurances that the accepted drainage scheme would cope with runoff from the site, the adjacent Selby Meadow Community Garden was inundated with mud carried by a flood of rainwater runoff. There is a real fear in local people that the same could happen at the Bird In Eye site, given its proximity and shared geological characteristics.



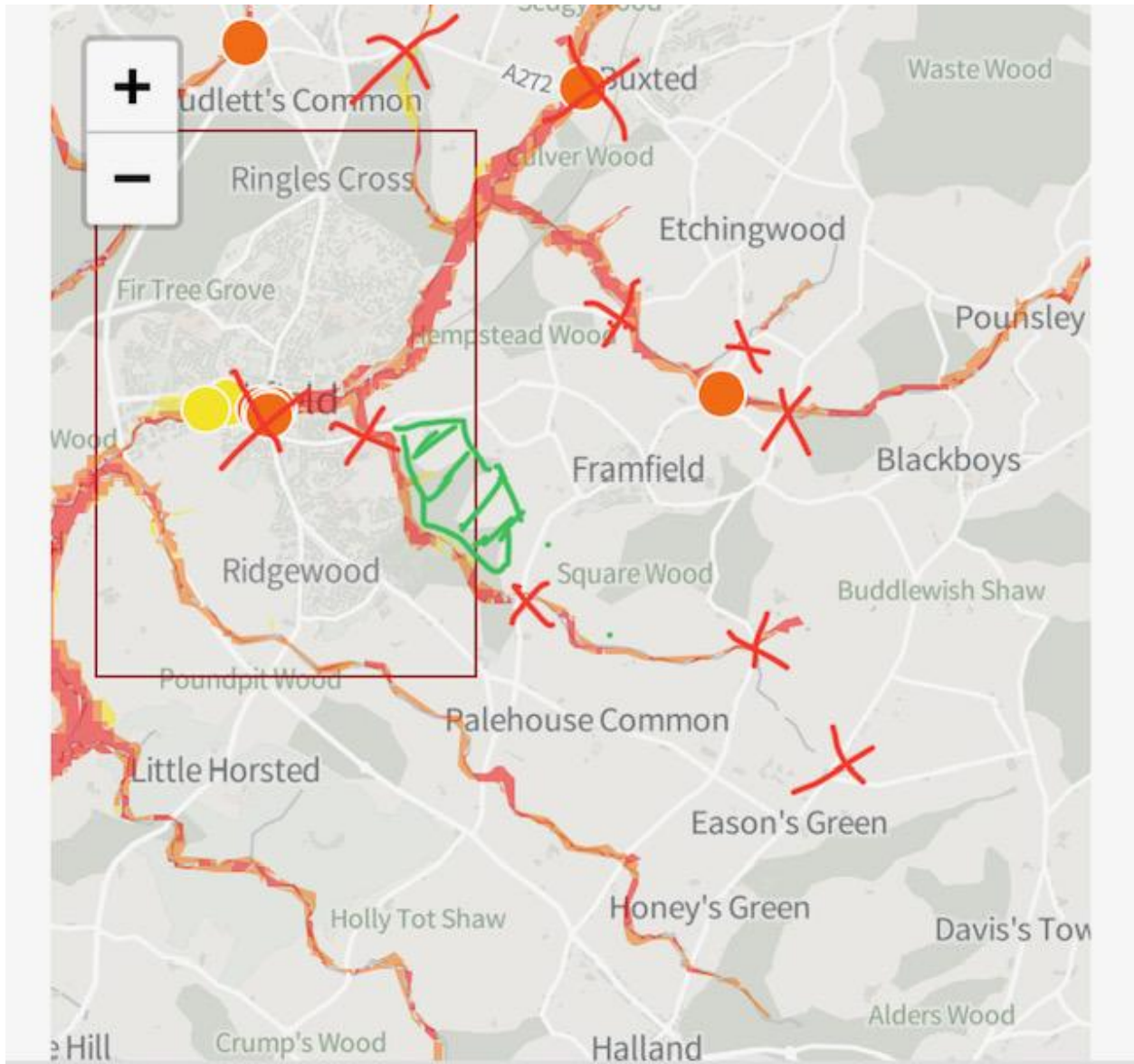


Just as the River Ouse that it runs into has a pinch-point at Lewes, the River Uck has its own pinch-point at Uckfield, where the combined waters of numerous tributaries converge upon the town.



The main tributaries of the Uck shown here are joined by countless other minor watercourses and springs which suddenly take on a much more forceful presence during runoff events.

The crosses on the flood map below show road locations prone to flooding from watercourses in the same catchment as the Framfield Stream and River Uck.



It is a safe bet to expect that if one place is flooded in the locality, the others will most likely be also.

This simple map rather shows that alternative access to Uckfield by exiting the application site to the east is fraught with risks of encountering swift flowing floodwaters in the same way as heading west and as such, should be discounted in practice upon grounds of safety.

The town remains upon a nervous knife edge regarding flooding.

Many local people, myself included, are deeply concerned that there seems to have been an increase in problems on and around the Framfield Stream since the construction of the Fernley Park Estate and more recently, the Mallard Drive extension.

Fernley Park residents have raised concerns over the adequacy of the suds balancing ponds upon their estate at times of high rainfall.

Generally and throughout the Framfield Stream Catchment, water levels appear to be higher in situations where rainfall has seemingly not been as significant as in previous times.

Residents of Harlands have witnessed the Nightingale Stream and Harlands pond becoming increasingly inundated.



The above images are unprecedented views of local flooding adjacent to property in Eagle Close, this feeds into Framfield Stream.

There is a huge fear that additional development in this catchment will affect the hydrology of the landscape even further, causing potentially disastrous consequences not only to immediate areas, but downstream in the centre of Uckfield itself.

These fears can only be amplified due to the obvious effects of climate change, which unquestionably are bringing us more extreme weather and at an increased frequency.

The risk of local flooding goes beyond the effects felt to fields and property.

The Sewage Pumping Station at the bottom of Bird In Eye Hill sits close to the Framfield Stream and is at risk of catastrophic inundation during flood events.

This would cause a major public health and environmental disaster, contaminating a vast area of the flood plain and beyond.

The pumping station itself is another subject which I fear needs to be raised in relation to this application.

The submersible pumps in this plant frequently fail and require regular repair and maintenance.

In conversation with Southern Water's contractors on site, they give one simple reason. "They are over-worked".

Living so near to this PS, with its regular failures, noisy cavitations and smells during frequent periods when tankers have to pump out its overfilled chambers, I can only imagine the litany of problems we residents would face if the application was approved and several hundred more homes were connected to this facility.



A typical regular view of Southern Water Contractors repairing failed pumping equipment at the at-flood-risk and "overworked" Sewage Pumping Station adjacent to the Framfield Stream.

Access to the application site from Framfield Road during a flood event must be regarded as impossible.

I have been present at floods at the location when the only person able to travel through the waters was the landowner Mr Berry on a rather substantial tractor.

In my role as emergency coordinator, I always am careful to give the advice "Do Not Enter Floodwaters".

The AA offers the following information:

<https://www.theaa.com/driving-advice/seasonal/driving-through-flood-water>

It is important to note that the advice reminds us that at a depth of just 15cm, a person in flowing flood water will find it difficult to stand and if knocked over, will struggle to stand up again.

Just 30cm of water is sufficient to move a vehicle.

There is also the risk of contaminants, debris, snagging, open holes and uneven ground.

Uckfield has a history of swift water rescues having to be made in flood events.

In 2000, a local shopkeeper luckily escaped with his life after being swept from his premises and carried downstream by the torrent.

He was fortunate to be spotted clinging to a tree and was subsequently rescued by Coastguard helicopter.



Similarly, lifeboat crews from coastal towns were in action to rescue people from their properties after the rapid rise of floodwaters.



The likelihood of such events is increasing.



Here, two local teenagers are recovered by Uckfield Fire Brigade Rescue Boat after being caught in rapidly rising flood waters on 9th August 2021.

Sadly, not all water rescues are successful.



On 13th July 2012, 77 year old Maureen Read wandered from the Uckfield Community Hospital. Whilst Maureen was in physically robust health, she was being treated for dementia and was quite confused.

At some point, she found herself at the junction of the Hospital Access Road and the B2102. She turned right and found herself upon the appellants site.

Unfortunately, the weather was unseasonably inclement and the watercourse closest to the proposed cycle/footpath was swollen.

Sadly, despite an immediate search upon her being reported as missing, Maureen's body was found in the watercourse the following morning of 14th July 2012.

In conclusion, with the inherent risks being so obvious, I would implore the Inspector to find that the appeal be unsuccessful and that development of this location be refused.

Duncan Bennett
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Further to this submission, I would like to draw the Inspector to the following selected excerpts from my previous objection regarding the original planning application, (dated 30/10/2021), which contains figures and data that I feel remain relevant and should be referred to in connection with this submission.

Objections to Application Ref: WD/2021/2198/MAO

1. Impact of Overdevelopment and destruction of essential character.

The view looking east from Uckfield is currently predominantly made up of arable farmland, pastures, floodplain water meadows and stands of mature and historically coppiced woodland, which maintains the essential charm and character of our rural community, and which has long encouraged residents to choose to live in our rural market town.

The Development is proposed on a dominant western-facing hillside east of the town and if built, this vista would be urbanised, thus robbing a vast number of residents of their long-standing countryside outlook and destroying the character of the locality..

A Majority of the new builds upon the proposed development would have urban views towards Uckfield too, leaving them being far removed from the rural retreat description promoted by the developers.

As it happens, all of the currently proposed and likely forthcoming large-scale sites around the periphery of Uckfield have the potential to detract from the character of the existing townscape, but this particular application is located so as to be uniquely the most damaging, as it is probably the only one which would be physically visible from vast numbers of viewpoints looking east or South East from the town.

This visual and character altering impact would be hugely detrimental for the whole town.

2. Demand for property

There is undoubtedly a need for homes to be developed in our region, but it has to be questioned whether building more multi-bedroomed estate houses will actually fulfil the specific needs for people needing homes.

The need would probably best be satisfied by the provision of smaller more affordable units for first time buyers.

This, of course, is unattractive for developers in terms of returning the maximum profit,

3. Sewage capacity

My experience in this is based upon various conversations with engineers engaged in the frequent repair of the sewage pumping station located by the bridge over Framfield Stream. In conversation, it is often mentioned that the frequent requirement to raise and repair or replace the submersible pumps at this location is basically down to them “being overworked”. It is fair to consider the words of these professional hydraulic engineers and believe that without a massive capital programme of improvement to the sewage system in this area, it could soon become seriously overwhelmed.

When we hear that Southern Water are “confident” of the ability of their wastewater treatment works to cope with additional sewage, one has to think beyond the confines of their treatment plant and consider whether the outlying infrastructure is also sufficiently capacious.

I fear that the existing local wastewater infrastructure will be found to be wanting in the extreme if this development were to go ahead.

In fact, Southern Water themselves have subsequently issued their own concerns regarding the application site’s likelihood of being the source of foul flooding.

Much play has been recently made in the press regarding the government allowing water companies to discharge excess sewage into water courses in the event of storm water inundation and we must be absolutely clear that these circumstances are without doubt becoming more frequent.

The result for the Framfield Stream and River Uck would be catastrophic in ecological terms and extraordinarily worrying in terms of public health.

4. Rainfall Runoff and Flooding

The lowest part of Framfield Road is already highly susceptible to the effects of runoff.

A British Telecom duct outside of 181 Framfield Road is frequently overwhelmed by rainwater runoff, with its heavy concrete inspection covers being physically lifted by the force of water welling up from it.

The constant outpouring of water from this duct continues until the groundwater levels have subsided.

This is an issue which I myself have reported to ESCC Highways and BT numerous times, both directly and via the fix my street app.

This situation has even led to the washout subsidence of nearby pavement, requiring emergency repair.

The issue has never been resolved, despite various intrusive works and inspections.

Again, in conversation with BT engineers at the location, they have advised that they are stumped as to being able to establish a local fix, as they believe the problem being an influx of runoff and groundwater which emanates from further up the cable run on Bird In Eye Hill.

Obviously, any alterations or exacerbation of the hydrology of Bird In Eye could be seen as a possible cause for this situation to worsen and this in turn may cause major issues with the operation and maintenance of our local telecommunications network.

More generally, the loss of natural vegetation and its ability to absorb and transpire vast quantities of water will have a massive effect upon runoff.

Permeable surfaces are of a far more limited help in our location when compared to natural vegetation

Add to this the additional loss of the limited amount of absorption and storage afforded by the topsoil which would be covered by brick, concrete and tarmac and the resulting increase in runoff would likely be disturbing.

Even a relatively small area of grassland is capable of absorbing at least an inch of water per week, with larger agricultural and indigenous species being even thirstier.

An average mature oak tree is capable of taking up around 50 gallons (500 litres) of water per day, with a large specimen oak said to be capable of taking up in excess of 300 gallons (1500 litres!) in the same period.

In the case of land in agricultural use, it takes 500 to 4000 litres of water to produce 1kg of wheat flour in a season.

That's an immense 100 to 800 gallons.

Vegetative transpiration is particularly important in terms of hydraulic management in our area, due to our unique geology and topography.

Our local Geology comprises a relatively thin topsoil, underlain by an impervious bed of Weald Clay, which in turn overlays a sandstone bedrock.

This thin topsoil provides little storage for water and the underlying clay is virtually in a state of constant saturation.

The result is that a rainfall event of any magnitude soon develops runoff.

The Topography of the area is defined by our position of transition from High Weald to low Weald, typified by hillsides with ghyll valleys and flood plains (natural storage)

The combination of this relatively volatile geology and our dynamic topography, means that very fast changing rises and falls in watercourses occur, with considerable potential for dramatic flood events.

In the last two decades, I have been honoured to have held the role of Emergency Coordinator for Uckfield Town Council and have maintained a close watch upon flood events, their cause and effects.

It must be taken into account that as a tributary, it is estimated (by computer modelling) that the Framfield Stream accounts for at least 20% of the flow of the River Uck which subsequently passes through Uckfield and any detrimental alteration to this amount of water, especially in times of stress through extreme rainfall and runoff must be avoided!

I have grave concerns regarding the high likelihood of increasing runoff resulting from this development and consequently the capacity of the Framfield Stream and its natural floodplain being capable of storing this additional flow (especially taking into account the current increasing development of residential properties on the opposite bank of the stream.

My own experience tells that the floodplain water meadow to the southern side of Framfield Road/Bird In Eye Hill often becomes dramatically inundated in even moderate flood events, with its ebbing away restricted by the capacity of the bridge under Framfield Road.

Any increase in this runoff floodwater would very likely lead to a circumstance where flood levels could even overtop the road embankment, severing the route between Uckfield and the development, creating a dangerous obstacle for vehicles and pedestrians.

Any proposal to include attenuation tanks, balancing ponds or "SUDS" is prone to being inadequate and can be no substitute for the existing properties of the natural environment which

has maintained a safe level of equilibrium for centuries, plus there is the question of responsibility and liability for the ongoing and long-term upkeep and maintenance of such facilities, with stories from similar sites across the country of poorly maintained and unserviceable items of equipment failing just as they are needed most.

Furthermore, with the unquestionable increase in extreme weather events caused by climate change, it would be extremely foolish to allow such potentially devastating development without cast iron effective, ecologically sound proposals for dealing with this issue both now and in a fast-changing climate scenario.

It is good to note that the District Engineer also agrees that the risks associated with this application are too great to merit acceptance at this time.



Above: An average frequent flood event.

The Framfield Stream Floodplain to the South of Framfield Road at the foot of Bird In Eye Hill
(16.02.2021)

During the floods of 2000, the road was cut off by floodwaters. With increasing extreme weather events, additional stress from further residential runoff is likely to make similar situations more probable.

5. Wildlife Impact

The area of the proposed development is home to many wild creatures.

Bird life is particularly prolific, with birds being pushed further from the centre of town by increasing development elsewhere.

A number of British owl species live in the vicinity, and various raptor species are commonly viewed, including Kestrel, Sparrowhawk, Buzzard and the occasional Red Tailed Kite.

The presence of these species tends to suggest that the environment is rich in their preferred prey and any change to this environment would be very harmful to the ecology of the area.

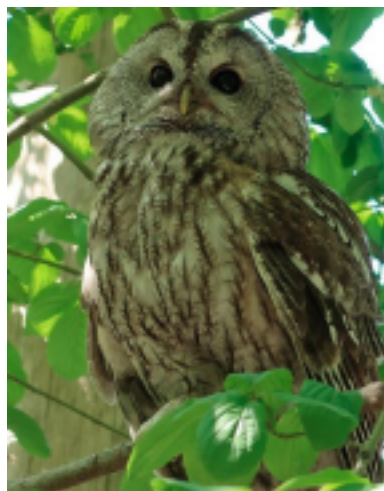
The lower fields and water meadow is a habitat for various mammals, ranging from voles and shrews up to fallow and roe deer.

I have spent many hours watching foxes playing in this location.

There are also numerous badger setts both in and adjacent to the application site.

These species are present due to the rich diversity of flora and fauna which form the area's essential ecosystem.

Any development would not only bring disturbance from human intrusion, but the inevitable increase in domestic cat ownership would undoubtedly cause the decimation of a wide range of small birds, amphibians and mammals, thus affecting a wide range of other species who depend upon a diverse food chain for survival.



Above: A Tawny Owl, one of a number of Owl and other raptor species which would be dramatically affected by the proposed development due to loss of both their and their prey species' habitat

Whilst it is noted that the applicants are proposing the inclusion of a SANGS (Suitable Alternative Natural Green Space) our local experience rather leads us to think of such places as merely being relatively ecologically sterile dog walking and toileting facilities, where concentrated human and canine presence limits the presence of other species in these places.

There is also the question of how these and other open spaces will be funded in the long run and to what level day to day management will be available. - We hear many tales of woe regarding the sheer amount of dog faeces left at the SANGS at Horsted Green, making non-dog walk visiting unpleasant in many cases.

The obvious increase in surface water runoff will undoubtedly flush certain pollutants into the watercourses which pass through and close to the site, which is a major threat to species reliant upon the current clean state of the environment and its resulting biodiversity.

6. Nuisance impact to existing residents and the environment

The proposed development would cause not only a loss of visual amenity but has the potential to create an unacceptable noise nuisance in this currently predominantly countryside location.

The position of the development upon a hill facing existing residential property, means that sound will resonate within the concave topography of the Framfield Stream valley.

Increased vehicle movement would also represent a significant nuisance for residents of the B status road, which offers an unsustainable means of access and egress from the site without additional unpopular and unfair works being undertaken to improve traffic flow, which would be detrimental to the safety of pedestrians in this residential street.

Enjoyment of the current dark skies would be destroyed by inevitable light pollution.

7. Specific highway impacts to residents of Framfield Road

The application includes proposals to undertake alterations to Framfield Road to effect improved traffic flow for the development.

These proposals are described as a "rationalisation" of existing parking provision.

In real terms this equates to the reduction of existing parking facilities.

This is neither rational, nor sensible in any context.

As a local ward councillor, I can tell you that the overwhelming issue that I am contacted about is the existing extreme paucity of parking spaces in New Town.

The New Town area was mainly constructed during the Victorian and Edwardian period, when car ownership was not contemplated, let alone mass car ownership..

Those architects of more than a century ago would be astounded to know that we now have a situation where most homes have a car, with many having two or more.

The application proposes the imposition of Double Yellow Lines in front of a group of terraced homes with no alternative parking provision and a formalisation (lessening) of existing spaces further East.

Currently, the over-subscription of available on-street parking is mitigated by permissive overnight and weekend use of the Mitchell & Cooper factory car park, but this informal gracious gesture by a private business is not guaranteed and cannot be relied upon as being permanent.



Above: The current lack of on-street parking is graciously supplemented by permissive evening and weekend parking in the car park of Mitchell & Cooper. This facility is often full of resident's vehicles at peak times, but this provision is neither formal, nor able to be regarded as guaranteed or permanent.

Pictured Saturday 30.10.2021.

This application proposal is quite rightly regarded as a disingenuous kick in the teeth for existing residents, who would not only see traffic speeds dangerously increased in their residential street but suffer the double insult and inconvenience of having their only and already stretched parking provision sacrificed for the benefit of those who will be able to sweep past en route to their driveways on the new development.

Previous suggestions to alter the parking along these lines were roundly dismissed by highways experts who actually described the positive nature of the current parking situation as being akin to "natural traffic calming", with vehicles having to slow down before negotiating parked vehicles which act as chicanes.

It would be wrong on many levels to take any action which unfairly disadvantages existing residents.

Were this proposal to be carried forward, the result would be a nightmare not just for those residents of Framfield Road who would be faced with the loss of their only available parking, but also for the already frustrated residents of adjoining streets who suffer from the lack of existing parking in their own areas.

Some years ago, I spearheaded the successful campaign to create the car park specifically for users of the railway.

This was mainly driven by the voices of residents who were concerned about commuters clogging up the few available parking spaces in their residential streets.

Recently, the Uckfield Community Hospital had to extend their staff car parking facilities due to a lack of capacity, which even now, following these works, still sees hospital users parking in the very on-street spaces proposed for removal in this application.

This is frankly a ridiculous proposal and must be dismissed in the first instance.



Above: Parking outside of the terraced houses of 167-181 Framfield Road Saturday 30.10.2021.

With no physical alternative facilities, where are residents expected to park in an area already widely blighted by a lack of parking spaces?

8. Infrastructure and access issues

It must be considered that such a large potential influx of population will exert inordinate pressure upon the infrastructure of the town.

Health, education, leisure and many other facilities are already stretched and the ability of our road network to absorb such an increase in vehicle movements must be doubtful.

Local public transport links are frankly inadequate to offer any support and the use of cars must be considered as being the only practical way for new residents of the proposed development to reach the facilities of the town and beyond.

The idea that new residents will always choose to walk or cycle from this outlying development to use the town's amenities is quite honestly a naïve lesson in wishful thinking and a large dose of reality is needed, with the unquestionable fact being that they will be car dependent for the overwhelming majority of their journeys from and to the proposed development.

This would place an unwelcome amount of additional pressure upon Framfield Road and the wider road network within the town.

Without definite indications as to how and when our local infrastructure can be guaranteed to be able to cope with such development, it would be madness to support any such application.

9 Social Isolation

The proposed development is a considerable way from the social facilities of the town centre. Anyone who does not have the means or ability to drive are very likely to become socially isolated.

This is particularly detrimental to the wellbeing of the most vulnerable in our society.

In conclusion

Speaking both as an individual resident and as an elected ward councillor for the area most impacted by this proposed development, I must object most strongly to this application being supported by Wealden District Council and I look forward to hearing that sense has prevailed, and this unsustainable application is rejected.

As an additional comment, I am very concerned over the number of inaccuracies, errors, out of date information and general poor quality of the applicant's standard of supporting documentation with relation to this application and would question whether it is actually viable to consider in its current format.

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