

On behalf of Uckfield Town Council and our residents, I would like to thank the Inspector and Inquiry for allowing us to speak.

Due to the changes in national planning policy between 2012 and 2021 since the last Inspector's review of a planning application for this site, we ask that matters of highway safety, biodiversity, landscape, heritage, flood risk and natural hydrology be prioritised for consideration.

In the opinion of Uckfield Town Council, despite the reduction in proposed housing numbers, there has been no significant change to the planning application to mitigate the concerns raised by the Secretary of State in 2009 – in particular there remains to be inadequate provision to facilitate walking and cycling to reduce the dependence on the car nor have there been any changes or improvements in infrastructure. In 2009 the Inspector clearly said that the development would place unacceptable impact on the surrounding highway network, particularly Uckfield Town Centre which is heavily congested at peak times. We would suggest that in fact with the increased development already approved and being built out in Uckfield, that town centre congestion, highway network capacity, lack of sustainable transport options, has deteriorated markedly since then.

Landscape, the importance of biodiversity net gain and the consideration of historical areas of importance in both in the natural and built environment have not been addressed properly in this or the last application. The development will have a detrimental impact to the local economy. The new access point and proposed roundabout, along with the congestion already experienced within the town, and increased vehicular movements from other large-scale developments in the area will naturally lead people away from Uckfield town centre and the support needed to retain a thriving economy.

Contrary to Wealden saved policy 4.6 the application **does not** maintain the development pattern **and is in breach** of parish boundaries naturally formed between Downlands Farm, Buxted, Fletching and Maresfield. Build out of this development will mean the distinct character of each settlement is lost and the removal of a non-designated heritage asset (Chicory Cottage) connected to the listed Buckswood Grange (formally the Rocks) is not a mitigation that the Town Council can support. This area contains much of our historical heritage. As in 2009, the proposed development still represents an unjustified and unacceptable form of development in open countryside outside the development boundary for Uckfield and right on the fringe of the town.

With local knowledge of the site and the adjacent land and infrastructure, Uckfield Town Council strongly objects to this planning application and supports the case outlined by Wealden District Council.

Uckfield Town Council would like to challenge the appellants on:

- Impact on Uckfield Town Centre;
- Highway safety and sustainable transport options;
- Conservation and ecology;
- Landscape and heritage;
- Flood risk and natural hydrology;

The impact on Uckfield from the proposed Downlands Farm development will be significant due to its detachment from the urban fabric of the town; preventing connectivity to local amenities and increasing dependency vehicles to access the town centre.

The Secretary of State referenced a headroom of 300 units back in 2009. However 2,266 units have either been approved or are being considered for approval in Uckfield including Cysleys farm, Eastbourne Road, Horsted Pond Farm, Mallard Drive, Ridgewood Farm, Ridgewood House, Siggs Yard. All of which will impact directly on the Town's capacity for vehicular access, community facilities and cause further congestion.

Highway safety and sustainable transport options

A report from East Sussex Highways within application WD/2022/2785/MAO for LAND NORTH OF EASTBOURNE ROAD, UCKFIELD in June of this year, said that the modelling provided revealed that the town centre junctions were already operating at capacity and could not be compounded further without town wide measures to improve the junction capacity, and for the highway to function safely for all users. The statement from East Sussex Highways also explained that to mitigate the impact of increased traffic flow, a more extensive area of the town centre would have to be assessed for implementation of a new control system. This has not been included by the appellant and we would disagree with the Transport statement of common ground between East Sussex Highways and the appellant that traffic impact in the town could be mitigated by any enhanced control system.

There is a significant level of police crash data in the town centre area involving motor vehicles, cyclists and pedestrians and data is particularly prevalent in the northern areas of the town at Coopers Green, London Road and the A22 Uckfield Bypass (including fatal collisions). Adding further vehicles onto these routes for essential journeys such as employment, school, leisure and shopping would exacerbate what is already impacting junction capacity, driver patience and subsequent awareness and road user safety. An extract of the crash data for this area from the Sussex Safer Roads Partnership is available in appendix A of this statement.

Traffic data on the A22 bypass close to the applicant's proposed new access point into the development (between Shortbridge Stream and Lake Wood) has recorded average total flows of up to 22-25,000 per day in 2023.

Copwood roundabout sees total flows of 20,000 vehicles northbound and 17,000 southbound on the A22 Uckfield bypass, and traffic using the A22 Maresfield Bypass from the Blackdown roundabout sees on average total flows of 21,000 vehicles per day (heading east and west).

Applicants often refer to the Sustrans report of JUNE 2018 which highlighted traffic movements per day with the A22/Uckfield Bypass at 10,000 plus. What they don't elaborate on, is that these figures reflect traffic flows each way, not total average traffic flows.

5000 – 10000 coming from the North of town into town from Budletts roundabout with a further 2500 – 5000 coming from A272 from Coopers Green traffic lights which meet the traffic coming in from Budletts roundabout.

The proposed location of the new roundabout sits cheek by jowl to the Shortbridge Stream – (*a salmonid designated stream and a tributary of the River Ouse*) and the ancient woodland of Lake Wood and Butchers Wood. These are protected areas and highly regarded in terms of

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their ecological value. The construction of a roundabout at this location would be detrimental to the biodiversity at this location and further downstream.

As recent as this month with subsidence on the A22 Uckfield Bypass, the town has seen temporary traffic lights creating gridlock throughout the town centre as far back as the Eastbourne and Lewes Roads in the south of Uckfield during peak times (AM and PM) and the roads into Uckfield already become congested at school drop off and pick up times, regardless of roadworks.

Rocks Road and Church street are likely to be used as cut throughs into the town centre, these are narrow, poorly lit minor roads with housing, businesses and the parish church on the roadside and cannot be used as a major sustainable transport corridor into the town centre as it is single traffic only at one point. Traffic lights at the top of Church Street do not have pedestrian control and in 2023 enquiries for a pedestrian crossing along Church Street to East Sussex Highways made was refused due to the size of this junction.

The appellant states that Snatts Road is a well-used link and considered fit for purpose and suitable as a main access route into town, Uckfield Town Council would strongly object to this statement as both ends of Snatts road are difficult junctions to turn out of and visibility is poor. The proposal to utilise this road for access to parking for the SANGS will increase traffic and congestion as there will be shared access by cycle, pedestrians in addition to existing access for residents to their private driveways. Works vehicles are also in and out of the cemetery daily. Photos of Snatts Road, and the proposed access point to the SANGS are included in appendix B of this statement.

From Snatts Road, vehicles would take a short cut via Claremont Rise, The Drive, and Manor Way which has a one-way system in place. The houses have limited onsite parking and the roads have parked vehicles all the way along reducing access and increasing danger to local residents.

Uckfield Town Council therefore supports East Sussex Highways and their statement objecting to this application and the statement made by the inspector in 2009 that:

1. None of the proposed pedestrian/cycle routes would be sufficiently attractive to users due to safety, accessibility, busy and polluted road with fast traffic;
2. Buses would not provide a significant component of overall sustainable transport usage by site residents;

The quality of pedestrian access on pavements is poor into the town centre. They are narrow, not easily accessible for those using disability units or pushchairs, and do not allow safe pedestrian usage especially along Church Street and from the junction of Rocks Park road and Snatts Road where the road and pavement narrows and vehicles often mount the pavement to allow for passing cars. There is no safe crossing point. There is limitation of what can be achieved in road or pavement widening due to property along the highway and width of road site and light in the area is minimal.

Uckfield is unusual in its linear design as it has one single road through the town centre which is divided by the river. This limits modelling changes and must be taken into consideration when considering this application. We understand from the extensive town centre regeneration works

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that there are no further modifications that could be successfully implemented to improve the traffic flow through the town.

Conservation and ecology

Downlands Farm is part of the heritage of North Uckfield, comprising of Ghylls, the lands of the Streatfeild family, and the carriageway to Streatfeild House. This is fully detailed in Vivienne Blandfords response. As we understand the field layouts, habitats and woodlands haven't changed since the 1600s and should form part of our town's heritage conservation area. Buckswood Grange is listed and with both Lake Wood and Chicory cottage linked to it, the proposed removal of the cottage would be contrary to planning regulations and indicates the appellants' disregard for our heritage.

Biodiversity loss is one of the most pressing contemporary global crises. Climate change had its first global treaty in 1994 to limit greenhouse gas emissions to prevent climate change. By 2042 the UK Government has committed via the Environment Act 2021 to improve biodiversity in England; to increase species abundance by at least 10% - a 10% biodiversity net gain requirement for development, restore or create 500,000 hectares of a range of wildlife rich habitats and reduce the risk of species extinction. A requirement for local nature recovery strategies and the creation of a nature recovery network. The G7 Leaders' summit agreed to the shared G7 Nature Compact and agreed that climate change was key to biodiversity loss and protecting, conserving and restoring biodiversity was crucial to addressing climate change both internationally and locally.

Areas of farmland, ancient woodland, and wetlands have established eco systems and support rich biodiversity with established green corridors and should be used by the UK Government as part of their biodiversity and conservation strategic nature recovery network and not used for further development which will destroy the very rural habitats, which we need to protect to reduce the catastrophic effects of climate change. Every time we build out on greenfield sites such as Downlands Farm we are making a choice as poor curators of the land we have been given to protect, to destroy the very eco systems that we need to support us. We cannot continue to do this without catastrophic affects both internationally and locally.

Historically the importance of the site and the green corridor which leads from Shortbridge Stream and Butchers Wood on the western side right through to Buxted Park SSSI on the eastern side of Uckfield has been understood and left undisturbed for hundreds of years despite the land being owned and farmed in that time. Downlands Farm is an important area of rich habitats supporting endangered species including the European eel, other amphibians, birds and mammals. We are particularly troubled by the apparent loss of two areas of what local residents consider to be ancient woodland along the bypass side of the site. Bluebells and anemones are indicators of an established ancient woodland. The impact of any development to this site has been widely documented by the Downlands Farm Action Group, Dr Martyn Stenning, the Forestry Commission, Woodland Trust, Mr and Mrs Williams, and Uckfield Town Council fully support all the statements made in their documentation.

Ancient woodland is valued for both cultural and environmental contributions across the English landscape and supports the diversity of plants, animals, lichens, and fungi. Downlands Farm is encircled by a significant amount of ancient woodland and although documents from the appellants say that ancient woodland is not being disturbed and access routes are not destroying the woodland that will be impacted is part of the natural woodland network and the flora and fauna at this site is identical to the character of that recorded at ancient woodland

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sites. The appellant has not provided documentation regarding the impact of development on Paygate Wood which is ancient woodland adjacent to the site.

The building of a boardwalk proposed as a solution by Natural England to reduce impact of footfall on ancient woodland in the SANGS will destroy the ground flora and soils and has not taken into consideration the letter by the Environment Agency dated 27th July 2022.

The erecting of the boardwalk risks contamination of aquifers and changes to hydrology by penetrating the soils by drilling in boardwalk fixtures. Any protected species would be harmed by walkways. The recent appeal outcome to the Land at Bird in Eye Farm referenced damage to flora, fungi when paths are laid, suppressed by installing path on the top.

Any fencing would also separate the habitats within the ancient woodland, therefore breaking up habitat connectivity which is considered an indirect effect causing loss or deterioration of ancient woodlands.

No mitigation that Uckfield Town Council is aware of has been considered by the applicants to mitigate these potential risks and reduce the unacceptable levels of water pollution that will directly impact the biodiversity of the site. Deterioration, loss and impact to ancient woodland, biodiversity and habitat corridors is not outweighed by any facilitation for health or well-being benefits gained by opening up Downlands Farm access to the general public.

Landscape and heritage

The NPPF at paragraph 199 states that great weight should be given to the conservation of designated heritage assets through an understanding of the impact of a proposed development on their significance and this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. The conservation reports are disappointing and do not appreciate the rural and tranquil nature of the area that this application is sited in.

Flood risk and natural hydrology

Woodlands, grassland soils, streams and rivers have protected our towns and villages from flooding and provided water security which is now being put under increased pressure with the building of multiple developments on areas that contain underground natural water supplies. Uckfield and surrounding villages and towns in Wealden are now classed as water stressed areas.

With the settlement of Uckfield on a flood plain, local knowledge and ArcGIS mapping tells us that there are approx. 30 natural water courses from little Horsted Roundabout to Black Down Roundabout. All of which feed directly into either the River Uck or the Shortbridge stream. Numerous developments have SUDS which are releasing water into streams around Uckfield and in turn flow into either the River Uck or River Ouse; placing the area at increased flood risk.

It should also be recognised that flood risk **cannot be** determined from consideration of just one application. There are now multiple developments which are all utilising the streams that feed directly into the River Uck which historically floods the bottom of the town. As recently as November 2022 Uckfield had its flood defences tested as the river broke its banks during heavy and prolonged rainfall. Wealden District Council mentioned in a letter dated 25/10/21 that although this site was shown within the Environment Agency FLOOD ZONE 1, the nearby areas were classified in zones 2 and 3 and any drainage system must consider this fact.

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Uckfield Town Council must ask that the Inquiry look at the bigger picture across the area, the high water table, evidence of wet woodlands and grasslands, and increased risk of flooding. The Town Council also questions whether the appellant has referred to the Uckfield Flood plan, version 5 2016, and the Uckfield Surface Water Management 2016. Flooding is a major risk for Uckfield and MUST be taken as a priority over further development.

Conclusion

In conclusion, as no direct contact has been made by the appellants with Uckfield Town Council before or during the submission of their application, and as key consultees on this planning application UCKFIELD TOWN COUNCIL request that the policies outlined in appendix C be taken into account when considering this application as we feel that the statements of objections provided evidence that this application is contrary to them all.

The Rt Hon Michael Gove said in October 2022 as part of the Levelling Up agenda that communities are to be put at the heart of the planning system and developments must have the support of local communities. This application received formal objections from the neighbouring parishes of Buxted, Fletching, Isfield, Marefield, Downlands Action Group and hundreds of local residents. The weight of local knowledge should therefore outweigh the proposals of this application.

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APPENDICES

Appendix A – Crash data

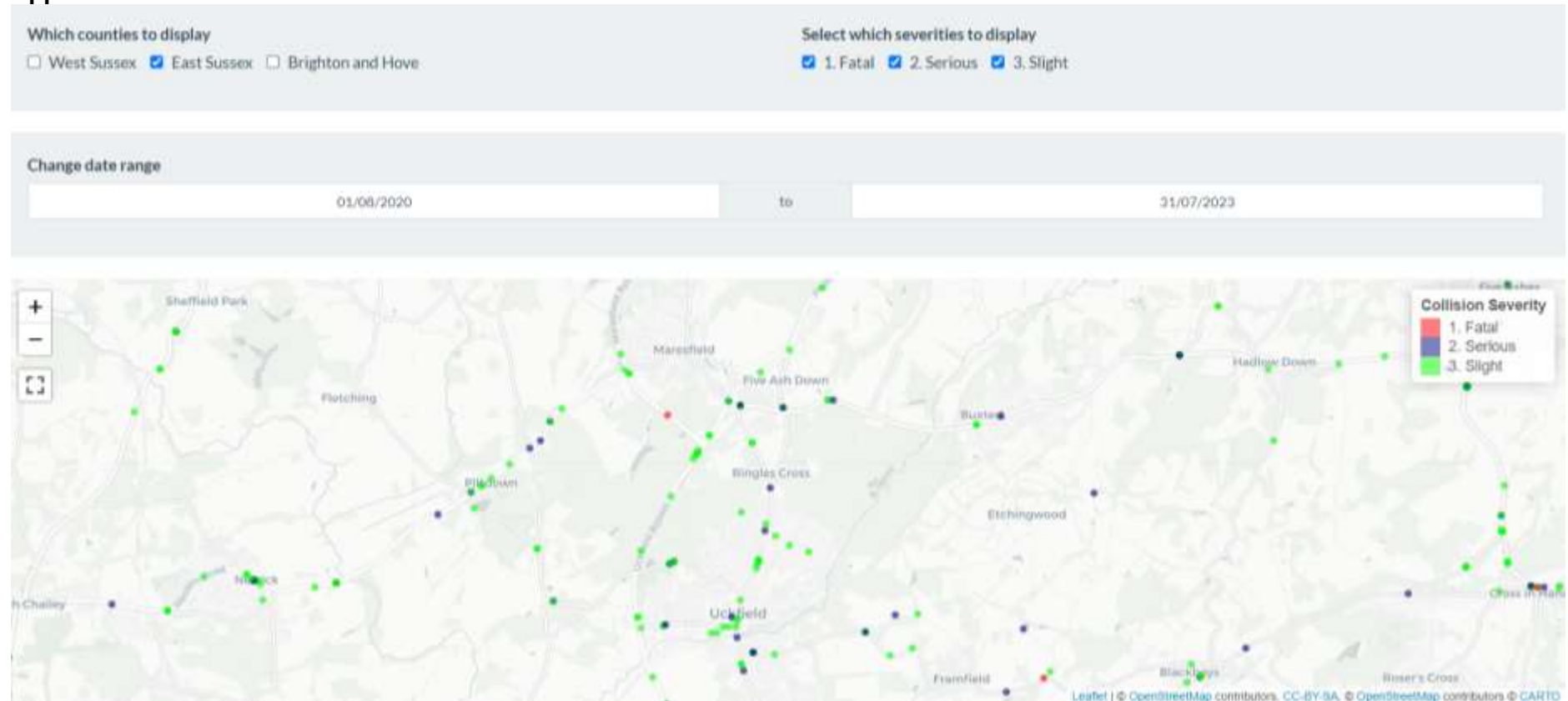


Figure 1: Fatal, serious and slight crash data – 01.08.20 to 31.07.23 (north of Uckfield)

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Appendix B: Photos of local road network



Figure 2: The Drive, Uckfield heading north by one-way junction of Manor Way



Figure 3: View out of Claremont, looking west on Snatts Road. Vehicles have to move out on bend to pass

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parked vehicles day and night. This is close to the proposed entrance to the SANGS.



Figure 5: View from Ringles Cross junction looking into Snatts Road. Parked vehicles line the entrance into Snatts Road daily



Figure 6: View from Cambridge Way junction looking east into Snatts Road

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Appendix C: We consider the application to be contrary to the following policies:

WCS7
WCS14
WCS12-
WCS 13

LP1998 4.6 (2) (3) (4)
LP1998 9.5(1) (3) (5) (6)
LP 1998 GD2
LP 1998 DC15
LP 1998 TR3
LP 1998 TR13

EN1
EN2
EN12
EN13
EN16
EN18
EN25
EN27
EN29
SP02
SP07
SP015

NPPF 104
NPPF 105
NPPF 106
NPPF 111
NPPF 206
NPPF 199
NPPF 130
NPPF 174 (b) (d)
NPPF 180 (c)
NPPF 206

Consideration must also be given to:
Section 66 (1) 72 (1) of the Planning Act 1990.