Comments

Event: Wealden Local Plan Submission Draft (Regulation 19)
Submission: SDR480
Consultee Name: Miss Holly Goring
Consultee Organisation: Uckfield Town Council
Consultee Position: Town Clerk
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Consultee Address: Uckfield Town Council Civic Centre Uckfield TN22 1AE

Consultation point: Chapter 1 Introduction

To which part of the Local Plan does this representation relate?

Paragraph number
Introduction - Paragraph 1.17 and 1.20 Ambitions for Wealden

Other (please specify)
Sustainable Development Introduction and Ambitions for Wealden

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.

Sustainable DevelopmentThe Local Plan is essentially a strategic vision for the District and talks of sustainability, but currently only considers applications within the red line, and subsequently risks the sustainability of that community. Uckfield Town Council is concerned that by assessing development sites individually, it could obscure the impact of cumulative growth.
Uckfield is already experiencing substantial development, particularly in the south of the town around Lewes Road, Eastbourne Road.
At the same time, substantial additional development is proposed or progressing in neighbouring parishes.
The Town Council therefore asks:
Has Wealden undertaken a comprehensive cumulative assessment of all existing, committed, permitted and proposed housing development which will rely upon Uckfield as a principal service centre?
If so, the Town Council requests that the evidence is clearly identified and demonstrates: which developments have been included;the number of dwellings included;the resulting

population increase;the infrastructure demand generated;the infrastructure capacity available;the infrastructure required;how that infrastructure will be funded; andwhen it will be delivered.
Ambitions for Wealden
For these reasons, Uckfield Town Council considers that further evidence is required before the Plan can be regarded as sound.
In particular, the Town Council considers that the Plan needs to demonstrate that it is:
Justified
The chosen distribution of growth around Uckfield must be supported by proportionate evidence and a clear assessment of reasonable alternatives.
Effective
The infrastructure required to support the cumulative growth must be demonstrably deliverable, funded and appropriately phased.
Consistent with national policy
The strategy must provide for sustainable development while properly addressing infrastructure, transport, environmental and community impacts.
The Council also considers that the Plan should demonstrate effective joint working on the cross-boundary impacts of development around Uckfield.

Consultation point: Policy SS1 Spatial Strategy for Wealden

To which part of the Local Plan does this representation relate?

Policy reference
SS1 1a)

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.

We have not seen any reference in the Plan, as to how sites just outside of a parish boundary can make contributions to the main settlement. No consideration is given as to how S106 or CIL contributions could be made available for the main settlement upon which the development will depend - in terms of key infrastructure.Policy Map 70 is inaccurate. It does not incorporate Budletts Common, and accurately reflect the parish/development boundary despite White House Farm being a site allocation.There is a lack of clarity on site allocations and if they are within or outside of our development boundary. For example Sites Uck 2-11 appear to fall within our development boundary but have been given reference numbers which relate to Little Horsted and Framfield. The sustainability of these sites has not been fully considered.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

We have not seen any reference in this Plan, as to how sites just outside of a parish boundary will make contributions to the main settlement. No consideration is given as to how S106 or CIL contributions could be made available for the main settlement upon which the development will depend - in terms of key infrastructure.For example, development in Framfield and Little Horsted parished will have direct consequences for Uckfield.
The Plan should therefore demonstrate effective joint working cross parishes and cross boundary. Joint working is needed to create outcomes and commitments for infrastructure to support residents in these new developments. At present this appears to be a gap, with no vision for the bigger picture to support the vitality of towns and villages and create connected neighbourhoods. For example...
How has the cumulative effect on the A22, Lewes Road, New Road, Eastbourne Road, Framfield Road and Uckfield town centre been assessed?What evidence demonstrates that the highway network can accommodate the cumulative growth?
Uckfield Town Council respectfully requests that the Inspector requires the Council to demonstrate, through robust and transparent evidence, that the cumulative housing and population growth associated with Uckfield and its surrounding functional area can be accommodated by appropriate, funded and deliverable infrastructure.

If your representation is seeking modification to the Local Plan, do you consider it necessary to participate in the examination hearing session(s)?

YES I wish to partcipate in the hearing session.

If you wish to participate in the hearing session(s), please outline below why you consider this to be necessary:

Uckfield is an example of where numerous applications are being approved which sit adjacent to the Uckfield parish boundary. The residents of these new homes will be utilising the town's services and infrastructure, but yet zero contributions are available to support us with improving our existing infrastructure and supporting the town's growth, and increased demand on facilities.

Do you wish to be notified when the Local Plan is submitted for independent examination?

YES

Do you wish to be notified when the Inspector's Report is published?

YES

Do you wish to be notified when the Local Plan is adopted?

YES

Consultation point: Policy HO11 Specialist Housing for Older and Vulnerable People

To which part of the Local Plan does this representation relate?

Policy reference

HO11

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

YES

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

The biggest gap isn't specialist housing, but accessible level access properties (bungalows, apartments) which should be featured within planning applications. At present, of all of the major planning applications within and outside of the Uckfield parish boundary, we believe only one has provided units suitable for downsizing, and accessible level access properties. All other sites are developing 3, 4 and 5 bed houses. This isn't creating a sustainable community, able to support its ageing population to remain in the area.

Consultation point: Policy NE3 Woodland, Trees and Hedgerows

To which part of the Local Plan does this representation relate?

Policy reference

NE3

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

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to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.

This policy is not currently being enforced, having seen full removal of hedgerow at Mockbeggars, off London Road, Uckfield to accomodate development, and the impact on ancient woodland Boothland Wood from adjacent development at Seghers Place. This policy is ignored to provide highway access. We support the concerns raised by Natural England. From what we've seen and understand "priority habitats and ancient woodland should be considered a constraint as well, due to the historical and complexity of all aspects relating to these areas."Priority habitats and ancient woodland should be considered as a constraint within the district. Evidence was submitted at the Planning Inquiry (appeal) for Downlands Farm, which showed the impact on Downland Copse from the close proximity of adjacent development. In Uckfield we have seen damage from increased footfall in Nightingale Wood, and dust/soil leaching from construction adjacent to Boothland Wood.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

We believe the buffer set should be a minimum of 50m for ancient woodland.

Consultation point: Chapter 2 Wealden District Key Characteristics

To which part of the Local Plan does this representation relate?

Paragraph number

2.4

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

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This paragraph notes that the district is part of a wider functional area, but doesn't consider functionality of key settlements.

The Town Council's principal concern is that the cumulative impact of development around Uckfield cannot properly be understood by looking only at sites which fall within the administrative boundary of Uckfield.

Uckfield functions as a major service centre for employment, education, retail, healthcare, transport, retail and community space for a considerably wider area.
Major developments located in neighbouring parishes will inevitably generate additional demand upon Uckfield's infrastructure and services.
This includes, in particular:
Owlsbury Farm, immediately west of Uckfield;Bird-in-Eye, in Framfield Parish;Cysleys Farm, in Framfield Parish;Horsted Pond Farm;Ridgewood development;Mockbeggars Farm; andother existing, permitted and proposed development around the town.
This is not simply a theoretical relationship.
Wealden's earlier Regulation 18 allocation material itself identified Cysleys Farm as being within Framfield Parish but associated with Uckfield as the adjoining settlement. Transport documents also acknowledge that Uckfield High Street is at capacity without significant change which is not addressed in Reg 19.
Furthermore, Wealden's Focused Regulation 18 consultation specifically considered Uckfield together with parts of Framfield and Little Horsted, demonstrating that the Council has itself recognised the functional relationship between these areas.
The Regulation 19 Plan should therefore assess the cumulative infrastructure consequences of development across the Uckfield Functional Area, rather than relying solely upon administrative parish boundaries.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

The Regulation 19 Plan should assess the cumulative infrastructure consequences of development across the Uckfield Functional Area, rather than relying solely upon administrative parish boundaries.

Consultation point: Policy INF1 Infrastructure Provision, Delivery, and Funding

To which part of the Local Plan does this representation relate?

Policy reference
INF1

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

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also use this box to set out your representation.

This is one of the Town Council's most significant concerns.
Traffic generated by development around Uckfield does not remain within individual development sites.
It converges upon the same network, including:
the A22;Lewes Road;New Road;Eastbourne Road;Framfield Road;London Road;the town centre; andthe principal roundabouts and junctions serving Uckfield.
The Town Council has repeatedly raised concerns about congestion and the cumulative effects of development on these routes.
The cumulative impact of Owlsbury, Ridgewood, Horsted Pond Farm, Bird-in-Eye, Cysleys Farm, Mockbeggars and other development must therefore be assessed together.
It is not sufficient to demonstrate that each individual development can provide an acceptable access arrangement.
The relevant question is whether the combined traffic generated by the wider growth strategy can be accommodated by Uckfield's existing and proposed highway network.
The Town Council therefore requests that the Regulation 19 evidence clearly identifies:
the cumulative traffic generation;the effect on town-centre junctions;the effect on the A22;the effect on Lewes Road and New Road;the effect on Eastbourne Road and Framfield Road;proposed junction improvements;the cost of those improvements;the source of funding; andthe anticipated delivery dates.
HealthcareWe have to consider medical needs. With Uckfield not having any NHS Dentists, residents are travelling further afield (subsequently adding to vehicle movements). Our local hospital is seeing a number of changes, with the loss of the Day Surgery unit. What is Wealden DC doing to keep on top of these changes, and are the NHS sharing data with the local planning authority, to enable the service to fully understand the local picture.

Consultation point: Policy SS5 Provision of Employment Floorspace

To which part of the Local Plan does this representation relate?

Policy reference
SS5 and EC2 and EC4

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.

At present, these policies, are not being enforced or time restrictions placed upon their delivery. The delivery of the employment space as part of the Seghers Place (Ridgewood Farm) site west of Uckfield took 10 years to reach approval at Reserved Matters, and is due to be built out at the latter stage of development on this site. This is delaying the need for the provision of further employment floorspace and much needed retail (supermarket) to support a growing town.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

At present, these policies are not being enforced or time restrictions placed upon their delivery. The delivery of the employment space as part of the Seghers Place (Ridgewood Farm) site west of Uckfield took 10 years to reach approval at Reserved Matters stage, and is due to be built out at the latter stage of development on this site. This is delaying the need for provision of further employment floorspace and much needed retail (supermarket) to support a growing town.
And it must be said, this site is more sustainable than Oakwood Park or the extension to the Ashdown Business Park due to its location and connectivity to Uckfield with pedestrian access and short travel by car.

Consultation point: Policy SS4 Retail Provision and Town Centres

To which part of the Local Plan does this representation relate?

Policy reference
SS4

Paragraph number
4.36

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

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This paragraph does not align with the reality of recent decisions taken.Retail provision should be given priority over conversion to residential within Town Centres and High Street

areas. Suitable infrastructure such as highway access and parking should be preserved, to enable the retention of retail in retail centres.The same method should be applied to business parks and the types of businesses that are able to take on industrial space, to ensure the retention of employment.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

This paragraph does not align with the reality of recent decisions taken.Retail provision should be given priority over conversion to residential within Town Centres and High Street areas. Suitable infrastructure such as highway access and parking should be preserved, to enable the retention of retail in retail centres.The same method should be applied to business parks and the types of businesses that are able to take on industrial space, to ensure the retention of employment.

If your representation is seeking modification to the Local Plan, do you consider it necessary to participate in the examination hearing session(s)?

NO I do not wish to participate in the hearing session.

Do you wish to be notified when the Local Plan is submitted for independent examination?

YES

Do you wish to be notified when the Inspector's Report is published?

YES

Do you wish to be notified when the Local Plan is adopted?

YES

Consultation point: Policy SS9 Health, Well-being and Quality of Life

To which part of the Local Plan does this representation relate?

Policy reference

SS9 2a.

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

YES

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

We believe 2a should read "provide high quality, inclusive and safe accessible places that support healthy living for people of all ages and abilities."An example would be that although Hempstead Meadows Local Nature Reserve in Uckfield is a beautiful open space and provides connectivity between the town and eastern edges of Manor Park, it can and has posed risks to the safety of residents as its located on a flood plain, and the water levels can rise very fast. ESFRS have had to rescue people in past years.

Consultation point: Policy INF7 Local Services and Community Facilities

To which part of the Local Plan does this representation relate?

Policy reference

INF7

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

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The cumulative impact upon Education must also be assessed across the functional area. Children living in developments outside Uckfield's parish boundary may nevertheless attend Uckfield schools.
The Town Council therefore considers that school capacity should be assessed against the actual catchment and travel patterns, rather than simply the parish in which the development is located.
The Council requests evidence demonstrating that sufficient:
primary school places;secondary school places;special educational needs provision; andassociated transport infrastructure
will be available to serve the cumulative population growth.
The assessment should include children generated by major developments outside Uckfield which are nevertheless functionally dependent upon the town.
The same principle applies to healthcare.
The Town Council is concerned that the cumulative effect of development upon:

GP practices;dentists;pharmacies;community healthcare;emergency services;leisure facilities;community halls;recreational facilities; andother local services
has not been sufficiently demonstrated.
Developer contributions secured individually from sites may not necessarily provide an adequate response to the cumulative increase in demand placed upon existing Uckfield services.
The Plan should demonstrate that appropriate infrastructure will be available when the population requires it, rather than simply identifying infrastructure as a long-term aspiration.

Consultation point: Policy SS7 Ensuring Comprehensive Development and Housing Delivery

To which part of the Local Plan does this representation relate?

Policy reference

SS7 1(c)

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

YES

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

No modification needed. We support 1c, to ensure delivery at pace.We would however request that this be extended further, and that tighter restrtictions be placed on delivery within set timescales to reduce landbanking.

If your representation is seeking modification to the Local Plan, do you consider it necessary to participate in the examination hearing session(s)?

NO I do not wish to participate in the hearing session.

Do you wish to be notified when the Local Plan is submitted for independent examination?

YES

Do you wish to be notified when the Inspector's Report is published?

YES

Do you wish to be notified when the Local Plan is adopted?
YES

Consultation point: Policy HO8 Affordable Housing
To which part of the Local Plan does this representation relate?
Policy reference
HO8

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)
YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)
YES

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.
This policy is supported, but in practice we are not seeing delivery of this policy. Applicants often find reasons to reduce the number of affordable onsite, despite numbers being approved within the outline application. The policy needs to further protect delivery, not just anticipation of delivery.

Consultation point: Chapter 13 Site Allocations
To which part of the Local Plan does this representation relate?
Policy reference
UCK11 Land at Owlsbury Farm

Site allocation
UCK11

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)
YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)
NO

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.

UCK11 - Land at Owlsbury Farm The proposed allocation at Owlsbury Farm is of particular significance.
The Regulation 19 strategy proposes approximately 1,300 dwellings at Owlsbury.
The current planning application, however, seeks up to 1,500 homes, together with 50 later-living units, a neighbourhood centre, primary school, sports facilities, open space, SANG and two accesses onto the A22.
The current planning application therefore demonstrates the potential scale of development that could ultimately affect Uckfield.
The Town Council recognises that the Local Plan should be assessed against the allocation contained within the Regulation 19 Plan. However, the relationship between the Local Plan allocation and the live planning application needs to be clearly understood when assessing cumulative infrastructure impacts.
Owlsbury is geographically and functionally an extension of Uckfield.
Its future residents will inevitably place additional demand upon Uckfield's:
road network;schools;healthcare;employment;retail centre;public transport;railway;leisure facilities;community facilities; andemergency and other public services.
The fact that the site is outside the administrative boundary of Uckfield does not remove these impacts.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

In reference to the Sustainability Appraisal - we support the removal of High Cross Farm (ref 400/1410) and Hempstead Farm (1232/1410).
The point in the Sustainability Appraisal Part 1 v3 1.4.13 indicates that the testing has shown the desire to focus growth in and around sustainable settlements, and to the edge of major towns, howeber we cannot find policy that gives financial support for this proposal.
There's a gap - as we have identified in previous Chapters, if applications fall outside of the parish or town boundary, the key service centre i.e. town or large village settlement lacks the investment it needs to improve existing infrastructure and develop more to support future growth.

Consultation point: Policy CC7 Managing Flood Risk

To which part of the Local Plan does this representation relate?

Policy reference
CC7 2.

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

YES

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

Uckfield sits on a Flood Plain and we are incredibly concerned that at present, most flood risk assessments undertaken by applicants are only reviewing the area within the red line, and not considering the subsequent impact on water levels and flood risk, further down the river/along the watercourse. An example would be the application for Bird in Eye North - what considerations have been undertaken to consider the impact to the existing flood defence and water levels within the town centre by the Roller Mill, Waitrose Car Park and at risk properties such as Bridge Cottage. It therefore needs to consider the risk on existing flood prevention areas. The current flood defence has not been retested or considered in light of the increase in development along the Eastern edges of the town's boundary and on and adjacent to the flood plain. This is a serious concern for the town.CC7 9. - any new culverting of watercourses to ensure delivery of new homes, should only be granted permission, if consideration and assessments have been undertaken to consider the impact of their introduction on existing flood risk and prevention measures. This is prudent for major developments such as Seghers Place and Owlsbury Farm adjacent to the River Uck, as all access points will bring in the need for a culvert.

Consultation point: Policy SS2 Provision of Homes

To which part of the Local Plan does this representation relate?

Policy reference

SS2

Other (please specify)

Table 4

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please

also use this box to set out your representation.

We feel Table 4 needs to include an extra column to explain which of the main settlements these allocations will be dependent upon.The number of committed and Local Plan allocated dwellings for Uckfield Parish doesn't reflect the number of committed dwellings and Local Plan allocations which will impact on Uckfield, as a result of their immediately adjacent location to our parish boundary.Once again, there is an inaccuracy in the northern boundary policy maps.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

We feel Table 4 needs to include an extra column to explain which of the main settlements these allocations will be dependent upon.The number of committed and Local Plan allocated dwellings for Uckfield Parish doesn't reflect the number of committed dwellings and Local Plan allocations which will impact on Uckfield, as a result of their immediately adjacent location to our parish boundary.
Please ensure accuracy of Policy Maps, for example Policy Map 70.

If your representation is seeking modification to the Local Plan, do you consider it necessary to participate in the examination hearing session(s)?

YES I wish to partcipate in the hearing session.

Do you wish to be notified when the Local Plan is submitted for independent examination?

YES

Do you wish to be notified when the Inspector's Report is published?

YES

Do you wish to be notified when the Local Plan is adopted?

YES

Consultation point: Policy NE4 Ancient Woodland and Veteran Trees

To which part of the Local Plan does this representation relate?

Policy reference

NE4

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

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This policy does not mention Ancient Trees.On Ridgewood Farm site, an ancient veteran tree has been trimmed back, to enable provision in that location for a bus route. This policy should be strong enough to ensure such incidents do not happen again, and development makes the necessary accommodation around such trees.

Consultation point: Policy CC8 Sustainable Drainage (SuDS)

To which part of the Local Plan does this representation relate?

Policy reference

CC8 b)iii

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

YES

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

CC8 b)iii could be expanded further to recognise drought conditions. We would support SuDs being multi-functional but as well as contributing to flood risk reduction, they should also be a consideration in water drought conditions for use on the development's green spaces for example (i.e. watering of new green infrastructure onsite)."Where possible" in regards to water quality is not strong enough. Water quality must be improved through SuDs systems. For example, the River Uck, and Framfield and Ridgewood Streams are in poor condition. SuDs should seek to improve water quality through their filtration systems. The impact of SuDs should also be considered on adjacent ancient woodland and in particular wet woodland. Further detailed assessments should be undertaken. An example where this is required is Owlsbury Farm, and in particular the Exceedance Drawings (paths).

If your representation is seeking modification to the Local Plan, do you consider it necessary to participate in the examination hearing

session(s)?
NO I do not wish to participate in the hearing session.

Consultation point: Policy SS10 Green Infrastructure

To which part of the Local Plan does this representation relate?

Policy reference
SS10 1.

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

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YES

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Although sound, there is evidence of where SS10 1. is not being enforced, and therefore suggests Policy SS10 needs strengthening further. Example: Boothland Wood (an ancient woodland) being impacted by very high soil piles both from leaching in heavy rain and dust impact, from the development at Seghers Place, Uckfield. Evidence is with the Planning Enforcement team.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

Consideration should be given to the prevention of all top soil being cleared, to minimise the impact on adjacent ancient woodland or areas of high biodiversity. Policy CC4 does allude to minimising soil health and disturbance but it needs further strengthening.

Consultation point: Policy SS8 Responding to Climate Change

To which part of the Local Plan does this representation relate?

Policy reference
SS8 and Policy CC3

Do you consider the part of the Local Plan, that you have referred to

above is Legally Compliant: (mark as appropriate)
YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)
YES

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.
It is noted that South East Water has assumed a total of 12,013 across the Local plan period. It is noted that they will be update the WRMP Plan but disappointing it won't be for another couple of years.
We are, as many reports and much data says, a water stressed area and we wonder if these calculations have included the water consumption required for the build out of the Local Plan calculations; constructions use for dwellings and employment. AI suggests it takes 8000 litres on average to build a brick house (mixing mortar, concrete, plaster etc). Has this been ascertained as a correct figure and added into the water consumer figures? Do we need a policy to ensure this is reduced either by using timber framed or another method? The same question also applies to dust control, especially with climate change bringing longer hot periods and the soils drying out.
Could SUDS hold water from the winters to provide water for the new development, ie watering new green infrastructure, hold and then release waters to protect water courses and their levels during drought. The water used in the construction of sites also needs to be considered.
Having attended the South East Water event on the 20 October and following updates from our local MP on this matter, it is good the company are being proactive in respect of fixing leaks and adding more strategy to their emergency plans. It is however still disappointing that they are still not bringing forward new reservoirs now/within this Local Plan period.
We note policy CC3 Sustainable Design and Construction does cover the above which is positive but we do ask that these policies be strengthened further, in the re use of grey water to flush toilets as an example.

Consultation point: Policy INF5 Safeguarding of Infrastructure
To which part of the Local Plan does this representation relate?
Policy reference
INF5 1.

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)
YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)
NO

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.

The Local Plan should reflect upon the importance placed on the reopening of the railway in the current ESCC Local Transport Plan (LTP4) and the Transport for the South East Core Strategy and ensure that district planning matters protect and support these objectives. The priority objectives set out by ESCC, are those which are directly applicable to being included in and supported by the Wealden Local Plan.
The District cannot simply plan upon delivering such a fundamental increase in population without considering the inclusion of promoting alternative sustainable, clean energy transport infrastructure which benefits so many.There were 58 recorded line closures and recorded disruption episodes on the Brighton and Tonbridge main lines between October 2021 and October 2026.BML recorded from Census 2021 data that 84% of Wealden's residents commuted by car or van, compared with the 70.6% England average. The Census data also highlighted that only 19.2% of Wealden's commuters commuted to London, with a higher proportion travelling towards the coast. It would improve access for young people to educational establishments.

Consultation point: Chapter 15 Glossary

To which part of the Local Plan does this representation relate?

Paragraph number
Town or Parish Council

Other (please specify)
Town or Parish Council

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

NO

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.

The description used for a Town or Parish Council is incorrect, and depreciating the legal and financial governance structures of a Parish or Town Council.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

A Parish or Town Council is a statutory body governed by the Local Government Act 1972, and the first and lowest tier of local government. They have statutory duties in the management of the council, and to provide allotment gardens within their parish. They have access to a range of statutory powers to deliver services within their community ranging from burial grounds, community centres and village halls, festive lights, sports pitches, play areas, nature reserves, community grants, streetlighting and public conveniences. We are at the grassroots of local government and often the first point of contact for enquiries, issues and concerns relating to planning.

Consultation point: Policy NE13 Water Environment and Water Infrastructure

To which part of the Local Plan does this representation relate?

Policy reference

NE13 1.

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

YES

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

We would strongly support this aspect of the policy, but ask that planning officers and the Planning Inspectorate consider this seriously. The example in question was the Mockbeggars site, off London Road, Uckfield. Residents and members of Uckfield Town Council raised their concerns with natural water lines and springs within that area, which impacted the water levels of the basement of an adjacent Farmhouse.

Consultation point: Policy INF2 Sustainable Transport and Active Travel

To which part of the Local Plan does this representation relate?

Policy reference

INF2

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.

The timing of S106 agreements sees such contributions being made at either the 500th or 750th home being built for example. Sustainable transport options should be in operation much earlier, one to support the first and second phases of development, and two, to build its profile, by completion of the site, rather than residents of the new development finding alternative modes of transport such as cars, which then sees bus services with reduced interest and take up, once running.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

This needs to be strengthened to recognise that sustainable transport and active travel options need to be brought in much earlier, alongside construction phases. S106 agreements which detail contributions on completion of the 500th or 750th home is not adequately supporting the new community, and will see new residents relying on vehicle usage instead of available active travel options.We would like to confirm again, our concerns regarding the impact of allocated sites on the A22. All access corridors into Uckfield, the road network within Uckfield and small country lanes surrounding the town are already close to breaking point. Minor roads are being used as rat runs. Even the small residential estate of Churchcoombe suffers greatly when a diversion is in place on Church Street or Snatts Road.The point within the Sustainability Appraisal report Part 1, V3 at Para. 1.4.8 refers to this concern with the comments to move to a Vision and Validation approach instead of a predict and provide. Any traffic calming measures or pedestrian crossings on the A22 will have a critical impact on the flow of traffic around and through the town. No consideration is given for the increase in homes on parking provision within the town. We receive comments each week from users of the Civic Centre that they have been unable to find a parking space in Luxfords Car Park, and its full. This is before all housing allocations have been delivered. The paid parking within the railway station car park, impacts on neighbouring roads, with many commuters parking in adjacent residential roads to avoid paid parking.Uckfield comes to a standstill approximately three times in a day, with the existing road network - morning, between 3.00pm and 4.30pm and 5.00pm - 6.00pm. The response from ES Highways to application WD/2025/0922/MEA details the number of impacts this site is proposing.
Looking further afield with the new runway at Gatwick Airport and other junctions further afield (A272, A267 and Earwig Corner, Lewes) are also impacted. The Metro 500 Bus Service has been welcomed.

Consultation point: Policy NE1 Biodiversity, Geodiversity and Nature Recovery

To which part of the Local Plan does this representation relate?

Policy reference

NE1

Do you consider the part of the Local Plan, that you have referred to above is Legally Compliant: (mark as appropriate)

YES

Do you consider the part of the Local Plan, that you have referred to above is Sound: (mark as appropriate)

NO

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representation.

This policy does not provide enough clarity on the assessments that need to be undertaken to test this and the criteria considered.

Please set out the modification(s), you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

Uckfield has a number of local wildlife sites, local geological sites, and two local nature reserves. Alongside our own management plans, there is also the adoption of the Local Nature Recovery Strategy. Documentation must align, and landowners should be informed on what policy framework they should be working to.Any anticipated loss or damage must be recorded by the applicant.