Downlands Farm application WD/2022/1637/MEA consultee responses

Sussex Fire and Rescue Services

If this application receives approval the Developer is required to ensure there is sufficient water for firefighting in accordance with the Water UK National Guidance Document. This is usually achieved by the provision of Fire Hydrant(s) attached to a suitable water main. Early consultation with East Sussex Fire & Rescue Service is recommended to ensure that all needs are met.

Environment Agency

We have no objection to the proposal as submitted following the inclusion of the below
condition(s) on any permission granted.

Piling using penetrative methods can result in risks to potable supplies from, for example, pollution/turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways.

Groundwater is particularly sensitive in this location because the proposed development site is located upon secondary aquifer A. This is especially relevant on this site as the Upper and Lower Tunbridge Wells Sand are isolated by the impermeable Grinstead Clay.

In light of the above, the proposed development will only be acceptable if a planning condition controlling disturbance of the aquifer is imposed. Without this condition we would object to the proposal in line with paragraph 174 of the National Planning Policy Framework because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.

Piling using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

Reason(s)
To ensure that the proposed pilling does not harm groundwater resources in line with paragraph 174 of the National Planning Policy Framework and Position Statement A2 of the 'The Environment Agency's approach to groundwater protection'.

The previous use of the proposed development site as residential development presents a medium risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a secondary aquifer A. The site is also vulnerable due to the shallow groundwater present.

The application's Geo-Environmental Site Investigation BRD Environmental Ltd Apr 2022 BRD2000653-OR3-D demonstrates that it will be possible to manage the risks

posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. Especially regarding the chicken shed which the above-mentioned report was not able to investigate due to overgrowth. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority.

In light of the above, the proposed development will be acceptable if a planning condition is included requiring the submission of a remediation strategy. This should be carried out by a competent person in line with paragraph 183 of the National Planning Policy Framework.

Prior to each phase of development approved by this planning permission no development shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site

1. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.

2. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy living full details of the remediation measures required and how they are to be undertaken.

3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved. Reason(s)
- To ensure that the development does not contribute to and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 174 of the National Planning Policy Framework.

Prior to each phase of development being occupied, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority.

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason(s)
• To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 174 of the National Planning Policy Framework.

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation
strategy detailing how this contamination will be dealt with has been submitted
to, and approved in writing by, the local planning authority.

The remediation strategy shall be implemented as approved.

Reason(s)
• To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 174 of the National Planning Policy Framework.

Crime Prevention and Design Adviser

Thank you for your correspondence of 14th July 2022, advising me of a hybrid planning application comprising: outline application (with all matters reserved except for access) for the erection of up to 424 no. residential dwellings including affordable housing, the provision of vehicular, pedestrian and cycle access and separate emergency access from the Uckfield bypass (A22), pedestrian and cycle access from Snatts Road, open spaces including children's play space, sustainable urban drainage systems, associated landscaping, infrastructure and earthworks; and full application comprising creation of a strategic sang, associated landscaping and car parking, and demolition of existing residential property and other buildings and provision of pedestrian and cycle access from rocks road, associated landscaping, infrastructure and earthworks at the above location, for which you seek advice from a crime prevention viewpoint.

I have had the opportunity to examine the detail within the application and in an attempt to reduce the opportunity for crime and the fear of crime I offer the following comments using Crime Prevention Through Environmental Design (CPTED) principles and from a Secured by Design (SBD) perspective. SBD is owned by the UK Police service and supported by the Home Office and Building Control Departments in England (Part Q Security – Dwellings), that recommends a minimum standard of security using proven, tested, and accredited products. Further details can be found at www.securedbydesign.com

The National Planning Policy Framework demonstrates the government's aim to achieve healthy, inclusive, and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed,

clear, and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas. With the level of crime and anti-social behaviour in the Wealden district being below average when compared with the rest of Sussex, I have no major concerns with the proposals, however, additional measures to mitigate against any identified local crime trends and site-specific requirements should always be considered and I would like to raise the following observations.
The application consists of two elements, an outline and full application. I feel it best to respond to each independently.

(1) Outline Application - (*with all matters reserved except for access) for the erection of up to 424 residential dwellings including affordable housing, the provision of vehicular, pedestrian and cycle access and separate emergency access from the Uckfield Bypass (A22), pedestrian and cycle access from Snatts Road, open spaces including children's play space, sustainable urban drainage systems, associated landscaping, infrastructure, and earthworks.*

I was pleased to note within the Design and Access Statement submitted in support of this application that guidance in creating the design and layout of the development has been taken from Secure by Design and Safer Street documentation.

The primary vehicular access will be provided at the south western edge of the site to provide a direct connection to the A22. The proposed access will be in the form of a new roundabout. An emergency access has been provided at the north-western end of the site to the A22. There are various proposed routes / access being proposed to the site for pedestrians and cyclists.

In the main dwellings are positioned facing the street and manoeuvring areas. This will create good active frontage. Whilst the majority of the dwellings have back-to-back gardens there are a number of vulnerable rear garden pathways. Parking has been provided for with garages, on-curtilage bays, parking courts and on-street parking bays. This should leave the street layout free and unobstructed. To avoid rogue and illegal parking around the site especially near the green spaces and potential cycle route, vehicle mitigation measures should be considered.

It is important that the boundary between public space and private areas is clearly indicated. It is desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination (max height 1m) of wall, railings, or timber picket fence. Whereas, vulnerable areas, such as exposed side and rear gardens, need more robust defensive barriers by using walls or fencing to a minimum height of 1.8m. There may be circumstances where more open fencing is required to allow for greater surveillance, such as rear garden pathways. Trellis (300mm) topped 1.5-metre-high fencing can be useful in such circumstances. This solution provides surveillance into an otherwise unobserved area and a security height of 1.8 metres.

Where gate provide access to the rear gardens they must be placed at the entrance to the garden as near to the front building line as possible, so that attempts to climb them will be in full view of the street. Be the same height as the adjoining fence so as not to reduce the overall security of the dwelling's boundary. Where possible the

street lighting scheme should be designed to ensure that the gates are well illuminated. Gates must be capable of being locked (operable by key from both sides of the gate). The gates must not be easy to climb or remove from their hinges.

The DAS mentions Cycle and cycle/pedestrian routes will be a minimum of 3m wide and will be separated from the highway via a verge. I would like to see this design feature reflected across the development, not just where it is adjacent to a highway. Where pedestrian and cycle routes are included into a development and where space permits, they should be at least 3 metres wide (to allow people to pass without infringing personal space and to accommodate passing wheelchairs, cycles, and mobility vehicles). If footpaths are designated as an emergency access route, they must be wide enough to allow the passage of emergency and service vehicles and have lockable barriers.

(2)Full Application - *Comprising creation of a Strategic SANG, (Suitable Alternative Natural Greenspace)associated landscaping and car parking, and demolition of existing residential property and other buildings and provision of pedestrian and cycle access from Rocks Road, associated landscaping, infrastructure, and earthworks.*

In order to ensure that there is as much natural surveillance across the development as possible, ground planting should not be higher than 1 metre with tree canopies no lower than 2 metres. This arrangement provides a window of observation throughout the area. This will allow for the interaction of capable guardians across the site to observe and report any incidents and occurrences. A capable guardian has a 'human element', that is usually a person who, by their mere presence, would deter potential offenders from perpetrating a crime. However, a capable guardian could also be CCTV, providing that someone is monitoring it at the other end of the camera at all times.

With respect to the proposed car park for the Woodland Park on the western elevation, I recommend that the proposed car park is segregated from the development with its own access point from the roundabout. This will remove any unesscary excessive permeability into the development, for instance by allowing any would be offender legitimate access to the development. The eventual site and the proposed car park on the eastern elevation should be open, flat, and level with good levels of natural surveillance across them, devoid of places to hide or loiter and where possible be illuminated.

Advice on vehicle parking can be found within SBD Homes 2019 V2 chapter 16. I would also ask you to note that Sussex Police is now exploring the impact of growth on the provision of policing infrastructure over the coming years and further comment on this application may be made by our Joint Commercial Planning Manager.
Sussex Police would have no objection to the proposed development as submitted from a crime prevention perspective subject to my above observations, concerns and recommendations having been given due consideration.

The Crime & Disorder Act 1998 heightens the importance of taking crime prevention into account when planning decisions are made. Section 17 of the Act places a clear duty on both police and local authorities to exercise their various functions with due

regard to the likely effect on the prevention of crime and disorder. You are asked to accord due weight to the advice offered in this letter which would demonstrate your authority's commitment to work in partnership and comply with the spirit of The Crime & Disorder Act.

Southern Water

Southern Water has undertaken a desktop study of the impact that the additional foul sewerage flows from the proposed development will have on the existing public sewer network. This initial study indicates that these additional flows may lead to an increased risk of foul flooding from the sewer network. Any network reinforcement that is deemed necessary to mitigate this will be provided by Southern Water.

Southern Water will liaise with the developer in order to review if the delivery of our network reinforcement aligns with the proposed occupation of the development, as it will take time to design and deliver any such reinforcement.

It may be possible for some initial dwellings to connect, pending network reinforcement. Southern Water will review and advise on this following consideration of the development programme and the extent of network reinforcement required.
Southern Water will carry out detailed network modelling as part of this review which may require existing flows to be monitored. This will enable us to establish the extent of any works required.

Southern Water endeavour to provide reinforcement within 24 months of planning consent being granted (Full or Outline) however for more complex applications our assessment of the timescales needed will require an allowance for the following which may result in an extension of the 24-month period:
- Initial feasibility, detail modelling and preliminary estimates.
- Flow monitoring (If required)
- Detailed design, including land negotiations.
- Construction.

Southern Water hence requests the following condition to be applied: Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate wastewater network capacity is available to adequately drain the development.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS).

Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDs component, adoption will be considered if such systems comply with the latest Design and Construction Guidance (Appendix C) and CIRIA guidance available here:
water.org.uk/sewerage-sector-guidance-approved-documents/
ciria.org/Memberships/The_SuDS_Manual_C753_Chapters.aspx

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:
- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

If the applicant proposes to offer a new on-site drainage and pumping station for adoption as part of the foul public sewerage system, this would have to be designed and constructed to the specification of Southern Water Services Ltd. A secure compound would be required, to which access for large vehicles would need to be possible at all times. The compound will be required to be 100 square metres in area, or of some such approved lesser area as would provide an operationally satisfactory
layout. In order to protect the amenity of prospective residents, no habitable rooms shall be located within 15 metres to the boundary of the proposed adoptable pumping station, due to the potential odour, vibration and noise generated by all types of pumping stations. The transfer of land ownership will be required at a later stage for adoption.

We request that should this planning application receive planning approval, the following informative is attached to the consent: Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water.

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with the Design and Construction Guidance will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.
It is possible that a sewer now deemed to be public could be crossing the development site.

Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.
For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: southernwater.co.uk or by email at:
SouthernWaterPlanning@southernwater.co.uk

Sport England

The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), therefore Sport England has considered this a non-statutory consultation.

It is understood that Wealden is a Community Infrastructure Levy (CIL) charging authority and as such, the proposed development is required to provide CIL contribution in accordance with the Council's adopted CIL Charging Schedule.

It is acknowledged that there is no requirement to identify where those CIL monies will be directed as part of the determination of any application. That said, Sport England would encourage the Council to consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan and direct those monies to deliver new and improved facilities for sport.

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:
https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/activedesign

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

Thank you once again for consulting Sport England. We would be grateful if you would advise us of the outcome of the application by forwarding a copy of the decision notice.

Nature Space Newts Officer

The development falls within the amber impact risk zone for great crested newts. Impact risk zones have been derived through advanced modelling to create a species distribution map which predicts likely presence. In the amber impact zone, there is suitable habitat and a high likelihood of great crested newt presence.

- There are six ponds present on-site, and five within 250m of the development site.

- There is direct connectivity between the development and the pond on site.

The applicant has provided an ecological report, [Baseline Ecological Appraisal, aspect ecology, June 2022]. Within this report it states that:-

An eDNA survey was carried out to determine the presence/absence of Great Crested Newt within five on-site ponds, P2-P6 and one off-site pond, P8 (see Plan 5719/ECO9). Water samples were collected on the 29/06/2019 following the procedure outlined in the methods manual prepared for DEFRA by Biggs et al. (2014)17.
Two on-site ponds (P1 and P6) and one off-site pond (P20) (see Plan 5719/ECO9) were subject to further specific Great Crested Newt survey between March and June 2020, having been identified through the HSI assessment as having 'good' potential to support Great Crested Newt, or having tested positive using the eDNA technique.

A medium population of great crested newts was recorded to be present in pond P6, whilst the species was found to be absent from all other ponds surveyed within the site and the wider study area.

Conclusion and recommendation for conditions:

I am not satisfied that the applicant has adequately demonstrated that there will no impact to great crested newts and/or their habitat as a result of the development being approved. As GCN were confirmed in the pond on-site during the 2020 surveys a licence is required for the development.
The applicant can either choose to use the district licencing scheme or provide information to satisfy the council that a licence can be granted by NE post planning approval (if approved) this would include all impacts, mitigation, compensation and any monitoring that is required.

WDC Housing

This response is provided having regard to the Wealden Local Plan 1998, Core Strategy 2013, Affordable Housing Delivery Plan 2016 and National Planning Policy Framework (NPPF) 2021.

The National Planning Policy Framework 2021 requires that affordable housing is sought on major development sites. This is defined as sites where 10 or more units will be provided or where the site has an area of 0.5 hectares or more. As the proposed development is for 424 dwellings, an affordable housing provision will be required.

Policy AFH1 of the Affordable Housing Local Delivery Plan 2016 requires a 35% affordable housing contribution. The Application acknowledges this by proposing a policy compliant 148 units of affordable housing to be provided on site.

The application suggests an initial tenure split of 75% rent and 25% intermediate units. It should be noted that there is now a requirement from the Government that a minimum of 25% of all affordable housing units secured through developer contributions should be First Homes. This is a low-cost affordable home ownership product whereby homes are sold at a capped price for the initial sale and are discounted by a minimum of 30% of the open market value for future sales. This will impact on the overall tenure split and the mix would therefore be around the following:

25 % of 148 affordable homes = 37 First Homes
40% of 148 affordable homes = 59 Social Rented
23% of 148 affordable homes = 34 Affordable Rented
12% of 148 affordable homes = 18 Shared Ownership

It is proposed that the development will include a mix of units from 1 to 5-bedroom properties. There is also an indicative mix given for the unit breakdown of the affordable housing units however it is acknowledged that this will be discussed and agreed with Housing Services, which we welcome and would encourage to ensure the mix provided reflects the local housing need.

A recent breakdown of the applications on the Housing Register in terms of the size of accommodation that applicants' require is set out below and the proposed affordable housing mix has also been included for comparison.

As the overwhelming need is for smaller properties, the Housing Service are pleased to see the provision of 1 and 2 bed units as well as the inclusion of some larger family units. We would recommend that the First Homes units are made up of the 1 and 2 bed properties to ensure affordability.

In respect of the 1 bed units we would recommend that these are designed in a maisonette style so that each flat has its own separate outside entrance as this reduces management and service charge issues.

The current proposal includes the provision of 38 x 2 bed flats and we would suggest that this number is significantly reduced and replaced with 2 bed houses or that they are used for the First Homes or shared ownership units. This is because many of the households eligible for 2-bedroom properties through the housing register include young children for whom flatted accommodation is less suitable, in addition to this 2-bed flats for rent are becoming increasingly difficult to let in the district and so there may be issues in securing a Registered Provider partner willing to take on these units.

The Housing Service is pleased to see that it is proposed that the affordable units meet or exceed the Nationally Described Space Standards and that they will be pepper-potted around the development. In line with the National Planning Policy

Framework 2021 and Policy AFH1 of the Affordable Housing Local Delivery Plan 2016, there is an expectation that the affordable units will be provided on-site. The Council can provide a list of Registered Providers to approach in respect of the affordable housing units. In exceptional circumstances a commuted sum may be accepted in-lieu of the onsite provision.

It would be expected that any Affordable Units or commuted sum would be protected by way of a Section 106 legal agreement.

Other design requirements of Affordable Housing- Guidance:

- Security - The affordable housing should meet Part Q Building Regulations and observe Secure by Design principles as recommended by the Police Architectural Liaison Officer. Doors and windows to be certified to PAS 24 standards.
- Sustainability - Comply with Part L Building Regulations.
- Sizes The affordable homes should meet or exceed the minimum sizes as required by the Nationally Described Space Standards based on:

1 Bedroom (2 person) units @ 50m2
2 Bedroom (4 person) houses @ 79 m2
3 Bedroom (5 person) houses @ 93 m2
4 bedroom (7 person) houses @ 115 m2

- Meet any Design and Quality Standards that may be required by Homes England or the Registered Provider.
- All affordable homes should meet current local and National Standards/ Part M Building Regulations with preference for M4(2) standards.

Other requirements for the affordable housing are that:

- Private outdoor amenity space must be provided in the form of gardens for houses and balconies/terraces or landscaped communal areas for flats with facilities for households to dry washing outside.
- Open plan kitchen/lounge layout is only acceptable for one bedroom homes.
- The affordable housing units should be owned and managed by a Registered Provider who is approved by the Council, and has entered into a nomination agreement with the Council.
- The developer/landowner should dispose of the affordable units to the Housing Association either on a freehold basis or on a long lease of at least 125 years.

Definition of Affordable Housing:

“Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers).”The full definition of Affordable Housing can be found in Annex 2 of the National Planning Policy Framework (2021). Definition of a Registered Provider (Housing Association):
A landlord registered with Regulator of Social Housing as defined in Chapter 3 of the Housing and Regeneration Act 2008, which is approved by the Council and has entered into a Nomination Agreement with the Council.

The Council will receive 100% nominations on initial lettings with 75% on subsequent lettings.

There are a number of approved Registered Providers currently working in Wealden District. They include:

- Saxon Weald Housing Association
- Orbit Housing Group
- Clarion Housing Group
- Town & Country Housing Group
- Stonewater Housing Association
- Hastoe Housing Association
- Optivo
- Golding Homes
- Hyde
- Legal and General Affordable Homes
- Sage
- St Arthur Homes
- Heylo
- Wealden District Council

ESCC LLFA

Objection August 2022

Thank you for consulting us on the above application. Although the principles of the proposed drainage strategy are considered to be suitable in principle, we require that clear evidence is provided at outline planning stage to demonstrate the viability of draining the site via gravity, as proposed. This is not clear based on the information provided. We therefore request that an updated drainage plan is submitted indicating cover and invert levels of attenuation features and corresponding outfall invert levels.

Objection 29 September 2022

The applicant has not fully addressed our request for additional information set out in our letter of 9 August 2022. While we accept this is an outline Application, we generally require further details to demonstrate the outline drainage strategy has been designed with consideration to the topographical levels of the site and the invert levels of receiving watercourses.

In addition, given that the drainage strategy for the application site currently relies on crossing areas of ancient woodland to discharge surface water, we would not be in a position to recommend approval of this application until the proposed protective measures for the construction of outfalls across ancient woodland are considered acceptable by the Local Planning Authority.

Parish Council

Objection

Councillors agreed to object to the proposed development on the following grounds:

1. The housing quota established in the 2013 Core Strategy for Uckfield has already been fully met.
2. While the Council welcomes the provision of open space within the proposals, it considers the application falls short in terms of providing the necessary infrastructure to support 424 no. houses. There appears to be no provision of facilities including schools, a doctors' surgery, shops, community halls, etc., and no thought to creating a 'heart' in the new community. There is very little planning gain for the community.
3. The Council is very concerned about the deleterious impact an additional 424 no. houses will have on the local road network. The substantial increase in car journeys that this development will inevitably generate will exert pressure on already saturated roads in the local area.
4. With respect to no 3 above, the Council considers that a Transport Plan should form part of the application such that the impact of the new houses can be properly evaluated.

WDC Footpaths

No objection

As shown on the attached plan, the legal line of public footpath Uckfield 1 abuts a short length of the site boundary close to the north-east corner. From the plans attached to this application, it would appear that this public right of way will not be obstructed as a result of this application. I would therefore have **no objection** to this application on rights of way grounds.

WDC Drainage

Flood Risk
The site lies wholly within EA Flood Zone 1 so the sequential test is met and the exception test is not required for this site. The site does not appear to be at risk from tidal, sea or fluvial flooding or from failure of a drainage asset such as a canal or reservoir. The majority of the site is at very low risk of flooding from surface water but with high risk flow paths associated with the watercourses described below.

Groundwater levels are stated to be typically greater than 1.9 metres below ground level. There are ordinary watercourse systems shown on the EA mapping which rise within the site and flow westwards off the site towards the Shortbridge Stream. The majority of these are ghyll streams located within areas of Ancient Woodland. There are ponds shown on the EA mapping within the application site, both associated with the watercourses and on their own.

There are no records of flooding close to this location within this Council's land drainage database.

The Geological Map for the area is complex. The eastern side of the site is on the Upper Tunbridge Wells Sand Formation of interbedded sandstones and siltstones; the north-western area is on the Ardingly Sandstone Formation of sandstones and the south-western area is on the Grinstead Clay Formation of mudstones.

Surface Water Drainage

There are no adopted, public surface water sewers in the vicinity of the site so this method of drainage is unavailable.

Infiltration is the first recommended drainage method in the SUDS hierarchy but the mixed, underlying mapped geology of the site and the presence of watercourses and ponds on the surface suggests that this may not be a usable solution for this site. No infiltration testing has been carried out.

The site drainage proposals are illustrative at present and comprise a series of swales and attenuation ponds directing water to the existing ordinary watercourses. It should be noted that drainage works will **not** normally be allowed in areas of Ancient Woodland even if directional drilling is used. Given the extent of this Ancient Woodland across the site, this may require a substantive redesign from what is presently proposed. The applicants are advised to discuss the matter with the Council's arboriculturalist as soon as possible. The Council does not wish to see areas of land raise just to accommodate filter trenches or swales and would wish for such areas to be redesigned. Given the presence of groundwater c2.0m below the surface it will be
necessary to line the ponds. There is no indication of the condition and size of the existing watercourses and their capacity (or not) to carry the water from the site.

In considering the drainage principles proposed for the site, the Lead Local Flood Authority, ESCC, will require full detail in the drainage calculations used to design the system and Wealden, as the planning authority, would support this request. The calculations should prove that the final design can accommodate the site runoff rates for the standard 1 in 100 year rainfall event plus 45% climate change. I note the need for the new 45% rate is acknowledged in the Flood Risk Assessment.

It is stated that note that the maintenance activities for the surface water drainage system are to be undertaken by a site management company. A full maintenance plan will be required when the drainage design is finalised and before first occupation.

Notes
Any new outfall or outfalls to an ordinary watercourse will require Ordinary Watercourse Consenting from the Lead Local Flood Authority, over and above any planning permission which may be may be granted. Provision of the foul sewage arrangements is for Southern Water to comment on.

Conclusion
In my opinion, the information provided within this application is not adequate for this application until and unless the question of outfalls through the ancient woodland can be addressed. I would therefore **object** to this application on surface water grounds. Should this matter be overcome to the satisfaction of the Council's arboriculturalist and you are minded to allow planning permission, I would wish to see the following **conditions** applied namely:-.

"No development shall take place until full details of the surface water drainage scheme, have been submitted to and approved in writing by the local planning

authority. The surface water drainage scheme should be confirmed as deliverable by an assessment of the site's potential for disposing of surface water by means of a sustainable drainage system. The submitted details shall include the following:
i. Supply detailed plans, layouts and sections of the proposed drainage system and pollution/silt control devices and construction details of any non-standard features.
ii. Provide a full management and maintenance plan for the development which shall include the setting up of any necessary company to secure the operation of the scheme throughout its lifetime or evidence of adoption by the PCWLMB.

iii. Supply full hydraulic calculations to the correct level of climate change (45%), to the satisfaction of the Lead Local Flood Authority. iv. Provide evidence by means of a photographic survey or similar that the receiving watercourses are in sufficient condition to receive the calculated flows.

NOTE: Attention should be given to non-statutory technical standards for sustainable drainage systems, the ESCC "Guide to Sustainable Drainage Systems in East Sussex" and the total costs of implementing the drainage scheme, that is design, construction and maintenance costs.

REASON: To reduce the risk of flooding, both on and off site, to improve and protect the water quality and improve habitat and amenity having regard to the guidance set out in the National Planning Practice Guidance and at paragraphs 163 and 165 of the NPPF and any local plan policies where appropriate according to the local planning authority, for example WCS14 of CSLP, saved policy CS2 of the Wealden Local Plan."

Buxted Parish Council

Buxted Parish Council would like to object to this application on the following grounds:

1. The housing quota established in the 2013 Core Strategy for Uckfield has already been fully met.
2. While the Council welcomes the provision of open space within the proposals, it considers the application falls short in terms of providing the necessary infrastructure to support 424 no. houses. There appears to be no provision of facilities including schools, a doctors' surgery, shops, community halls, etc., and no thought to creating a 'heart' in the new community. There is very little planning gain for the community.
3. The Council is very concerned about the deleterious impact an additional 424 no. houses will have on the local road network. The substantial increase in car journeys that this development will inevitably generate will exert.
pressure on already saturated roads in the local area.
4. No consideration has taken place of the effect that this large development would have on the nearby village of Buxted and the inevitable use of the train station there from the putative Downland residents. The parking, at Buxted, in normal times, is at capacity. Given that other development in the areas between the A22 and the A272 have had their objections to the applications rescinded by WDC, the small cut through of the A272 at Ringles.

Cross/Five Ashdown would be totally inadequate to deal with the increased traffic, as will the Ringles Cross Traffic lights where there is no provision for pedestrians, who may wish to walk to Buxted to cross the road.
5. With respect to no 3&4 above, the Council considers that a Transport Plan should form part of the application such that the impact of the new houses can be properly evaluated. This should be expanded to evaluate, fairly, the effect this will have on the neighbouring villages.
6. The well documented objections on the negative effect on ecological matters should be, once again considered, given this one of the reasons for past refusal of developing this site. This includes the devasting effect this development would have on Lake Wood at the south of the site, which has not even been assessed in the accompanying documents. Nor the effect on Malling Budletts Common which is a rare example of a medieval farmed common land surviving into the 21st Century. The Heritage and Archaeological Assessment carried out by Gleesons, inevitably, and possibly correctly, contains only that information which is known. However, we urge WDC to take into account the local knowledge that has been gathered since that publication, by local people on ecological and historical grounds.

Sussex Wildlife Trust

The Sussex Wildlife Trust (SWT) has recently become aware of application WD/2022/1637/MEA . We have viewed the information submitted online with the application and wish to submit the following **objection** relating to biodiversity.

Site context
SWT wish to highlight that this site has been identified as unsuitable for development in the 2018 SHELAA for the Local Plan as a result of its landscape and biodiversity value. The site has also previously been turned down for development through a Public Inquiry process in 2009. Therefore we do not support the development of this site on the grounds of impacts to biodiversity.

2018 SHELAA
Land at Downlands Farm, Snatts Road, Uckfield (site ref : 137/1410) is included with the Wealden DC 2018 SHELAA documentation as a site unsuitable for development. The reasons for the site not being suitable for development has been expressed in the SHELAA as:

This is an area of attractive rural landscape on the fringes of Uckfield, **containing much ancient woodland. Development of the site would entail considerable adverse landscape impact and would compromise its nature conservation integrity and biodiversity interests.** *In addition, development of the site is unacceptable on transport sustainability grounds and because of its relative inaccessibility from the town centre. The site was also subject to an appeal which was dismissed by the Secretary of State in 2008 due to specific site constraints.*

2009 Public Inquiry
Downlands Farm was also refused permission for development following a public enquiry in 2009. The inspector stated in section 53 of the decision notice that:
The conflict with development is most serious in the case of Downlands and the secretary of state considers that the proposal is unacceptable in terms of landscape

impact and traffic impact. She further considers that the overall balance of ecological considerations does not weigh in its favour. While the provision of affordable housing carries some weight in favour of the proposal, the Secretary of State considers that, overall, in the light of her conclusion on housing need, there are not sufficient material considerations in favour of the scheme to outweigh the conflict with the development plan.

Whilst we recognise that the current application details are different to the previous application, there has been a clear and considered precedent set against development on this site as a result of a number of factors, including its biodiversity value. The surrounding areas, such as the Woodland Trust's Lake Wood Reserve, which sits adjacent to the application boundary are ecologically and functionally linked to the development site and have been continually monitored and observed as a result of their biodiversity. This is expressed in detail by the objection submitted to this application by **Dr Martyn J. Stenning M.Phil. D.Phil. MRSB. CSci.**

Biodiversity Opportunity Areas
SWT also wish to emphasise that the application sites sits within the Western Ouse Streams and Ashdown Forest Biodiversity Opportunity Area (BOA). Since the ascent of the Environment Act in Nov 2021 it has been clear that a Nature Recovery Network (NRN) will be fundamental to addressing the ecological and climate crisis. The development boundary has a number of designated sites surrounding it. West Park Uckfield Local Nature Reserve (LNR) is located approximately 100m to the south of the site, Lake Wood Local Wildlife Site (LWS) is directly adjacent to the development site, while Butchers Wood Local Wildlife Site (LWS) is functionally linked to the Downlands Farm site. Further to this the site sits within the impact risk zone for the Buxted Park Site of Special Scientific Interest (SSSI) which is located approximately 800m to the east of the site.

To wilfully encase these habitats in development when they have an important role to play in the support and delivery of a functioning ecological network, would be undermining the governments environmental ambitions to halt biodiversity loss by 2030, the requirements of the National Planning Policy Framework (NPPF 2021) paragraph 179 and the Wealden Core Strategy (2013) saved policy WCS12 Biodiversity.
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Outline Application
We note that one part of the application is outline with all matters reserved apart from access. From the information presented with the application, SWT wish to make the following comments in relation to the application and biodiversity.

Ancient Woodland
The presence of Ancient Woodland within the development site and the potential direct and indirect impacts to this irreplaceable habitat are of considerable concern to Sussex Wildlife Trust. We highlight to WDC that ancient woodland is recognised within the NPPF 2021 Paragraph 180 in which is states:
180. When determining planning applications, local planning authorities should apply the following principles:

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons63 and a suitable compensation strategy exists;
We recognise that the applicant's statement includes information that buffers to the ancient woodland will be incorporated and that further management for the ancient woodland will be brought in. We do not have confidence that these measures would be sufficient to address the deterioration in the quality of the habitat, especially when the two aspects of the application (full and outline) are considered in combination. Irreplaceable ancient woodland habitat will be under significant increase indirect and direct pressure and will also be accessible as part of the site's proposed Suitable Alternative Natural Greenspace (SANG).
The application is currently proposing buffers at a minimum of 15 meters for the ancient woodland, we suggest that the application needs to respond to the precautionary approach and ensure that the site would deliver buffers of 50 meters for this irreplaceable habitat. This is highlighted as an approach in the Woodlands Trust Planners' Manual for Ancient Woodland and Veteran Trees' (2019).

The development of this site will result in an increase in recreational pressure on the habitats that are being retained on the site both inside and outside the SANG boundary and potential on adjoining sites such as Lake Wood (LNR/LWS). The SANG contains irreplaceable habitat in the form of ancient woodland that will be accessible to both walkers and their dogs. It does not appear that the impact on the woodland complex as a whole from this impact has been assessed. The presence of domestic pets within the development will also have the potential to cause considerable pressure on these irreplaceable habitats and the species they support as a result of increased predation and fouling.

The application has stated that the access and emergency access for the site will be located in areas labelled as mostly non-ancient woodland. When we look at the access and ecological information in combination, we note that the access points for development are proposed through areas of lowland deciduous woodland, which is a priority habitat and as such a material consideration and an important component of the woodland complex and recognised within the NPPF (2021) Paragraph 180.

SWT are concerned that the connectivity and function of the wider ancient woodland complex will be compromised by the access proposals. We highlight to Wealden District Council that the ecological surveys of these woodland compartments suggest mostly non ancient woodland and lowland deciduous woodland priority habitat with clear ancient woodland characteristics. The Ancient Woodland Inventory is provisional and not definitive, therefore we question whether areas of priority habitat woodland within the application site would meet the definition of Ancient, and therefore constitute irreplaceable habitat. Even if this is not proven, the site has clearly been wooded for a significant period of time and includes rich floral and soil diversity.

We ask Wealden District Council to seek clarity on the buffer to the ancient woodland that surrounds the emergency access road and how it has been incorporated into the application. Wealden District Council must also consider and assess hydrological impacts on the Downlands Farm site. The site contains Ghyll woodland (Longwood Gill) and is a functionally and hydrologically connected to the

Woodland Trust's Lake Wood Reserve which contains a s*phagnum* peat fed lake. We are concerned that the increase in covered/impermeable surfaces coupled with locations of SUDs and diffuse pollution have not been assessed with regards to their impact on ancient woodland within the functioning landscape. We note that the Environmental Impact Assessment non-technical summary states in section 8 that the construction and complete development 'could *lead to damage of the Ancient Woodland, resulting in a local and permanent adverse effect of major to moderate significance.'*

Whilst the applicant has suggested that '*the drainage strategy demonstrates how there would be no material change to the hydrology within the Ancient Woodlands and the woodland brooks and the residual effects would therefore be negligible'*. We draw your attention to the objections and comments raised in relation to drainage from East Sussex County Council Lead Local Flood Authority and the Wealden Drainage Engineer who request more detail including from the drainage strategy to determine impacts.

SWT are concerned that the application will lead to the deterioration of ancient woodland which is contrary to national policy. Given that there are no wholly exceptional circumstances for this development we feel this application should be refused.

Bats and Dormice

We can see that Bat and Dormice Surveys along with a number of other protected species surveys have been conducted and presented in ES Appendix 7.1 . The Bat Transect C, indicated its highest level of activity at location 7 which appears to be in the area of the access road. The non-technical summary of the Environmental Impact Assessment states in section 7.6 that with the completed development *there will be minor to moderate adverse effects on foraging and Commuting bats and Dormouse*. However we are unclear how the presence of these protected species on site have even been considered in the overall design and future monitoring. We have seen reference to a dormouse bridge over the access road but we do not seem to have located information that provides more detail about these features. Given that the access roads are seeking full permission we would ask Wealden District Council to ensure they have confidence in the level and detail of information presented regarding these protected species. Further to this given that bat species are using the site for commuting/foraging we have seen no information within the application that considers this ecological function against the indicative layout of the housing or the breaches in habitat that will occur as a result of the access road.

Biodiversity Net Gain (BNG)

SWT notes that a Biodiversity Net Gain (BNG) Assessment Report has been submitted with the application which states that the application will seek to deliver a 27.33% in Biodiversity Units. We are concerned that the development of 424 residential units and associated infrastructure will not enable meaningful BNG to be delivered on a site that is already of value to biodiversity. It is our opinion that the recreational pressure and disturbance (both direct and indirect) that will result from the proposal will undermine any meaningful gains for nature being proposed.

We have not found it possible to fully study the validity of the metric presented because we were unable to find all the information required to assess the metric. For example:

Grassland:
We assume paragraph 5.12 of the Biodiversity Net Gain Assessment contains a typo and is referring to sites SI1-SI4 rather than SC1-SC4. Taking this to be true, this paragraph states that grassland area SI4 is classified as being in poor condition due to 'the presence of scrub invasion and the presence of undesirable species'. However, looking at the Habitat Condition Assessment Matrix SI4 has also been failed for criterion 1: 'The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type (see UK Hab definition). Wildflowers, sedges and indicator species for the specific grassland habitat type are very clearly and easily visible throughout the sward. NB - This criterion is essential for achieving moderate condition for non-acid grassland types only.' It is not explained why this failure has happened given the broad nature of the UK Habs definition of 'other neutral grassland'. It is also not clear why condition 6 has not been judged in the table? Overall we question whether the existing condition of area SI4 should be moderate and not poor?

SI1 & 3 have been condition assessed as moderate as they failed to meet the criteria of 6-8 species per M2. However we have been unable to find reference to what species per M2 were in the botanical surveys (although this information does appear to be present for SI4 in the appendix of ES 7.1). Without this information we cannot see if the grassland should already be condition assessed as good. Therefore when the report suggests that semi improved grassland will be in good condition within 15 years, we are unable to question if this is a true reflection on the gains to be achieved.

Given that the delivery of BNG for grassland within the area also designated SANG have the applicants factored in achieving a good condition with the presence of dogs and possible fouling within the habitat and the impact that could have on condition and how it will be achieved.

Ponds:
When the ES is looked at Table 4.2 of Appendix 7.1 briefly describes the 6 ponds existing on site. Paragraph 4.11.2 states that '*overall, the ponds are considered not to form important ecological features in their current form, although there is significant scope for their improvement*'. It also states that '*recommendations for their retention and enhancement are detailed at Chapter 6*'. However, chapter 6 is simply a summary of the ecological baseline and does not discuss enhancements.

However when we then consider the habitat condition assessment matrix in the Biodiversity Net Gain Assessment, it assesses all 6 ponds as being in 'moderate' condition. Ponds p1 to p5 only fail on one criteria: '*Good water quality with clear water and no obvious signs of pollution. Turbidity acceptable if grazed by livestock*'. Within the BNG Report Table A-3 for Site Habitat Enhancements states that all 6 ponds will be enhanced to 'good' condition. Presumably the only way to achieve this is to ensure '*good water quality with clear water and no obvious signs of pollution*'. However, we cannot find any information to explain how this will be achieved and

actions to this end are not referenced in the Schedule of Management works in the SANG and Woodland Management Plan. We therefore question the feasibility of delivering this gain.

Ancient Woodland:
The BNG report appears to deliver the biggest percentage of BNG from the enhancement of the ancient woodland. We question the incorporation of ancient woodland in the overall BNG percentage given that we do not feel that impacts have been addressed. While we recognise that the application is proposing improvements to management to improve condition, this does not address impacts from recreational disturbance to the habitat directly and the species using it. Therefore, we question the delivery of meaningful BNG.

Full Application

Suitable Alternative Natural Green Space (SANG)

We note that the second part of the application relates to the full permission for the SANG. It is our understanding that the SANG is intended to reduce pressure on the internationally designated site of Ashdown Forest SPA. The reduction in recreational pressure is primarily focused on dog walkers. Given that the SANG for this site also incorporates ancient woodland and this also comes with specific guidance relating to direct and indirect impacts on these irreplaceable habitats, we wish to understand the following matters and ask how Natural England has advised on matters relating to the SANG and ancient woodland.

We also wish to highlight that the SANG Guidance from Natural England states:
'The identification of SANGS should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANGS, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the development plan.'
Having looked at the plan WD-2022-1637-MEA_Plans_edp6170_d016-F-SANG_ Detailed Hard and Soft Landscape Design.

We can see that the proposals include *unsurfaced path with loose log edging - Footpaths to be lined with brash, approx. 0.5m high and aligned with, and set approx. 1m back from, the path to encourage people to stay on the route*. It appears that some areas of these footpaths are within areas designated as ancient woodland, as such SWT wish to understand how the impacts on the ground flora of the ancient woodland has been avoided with the inclusion of such proposals? The SANG Management Plan with the application has stated in section 3.9.2:

Within woodland and grassland areas of the SANG there exists a network of existing unsurfaced desire lines and tracks, which already receives a limited amount of informal footfall, and means that the SANG can accommodate new recreational use with a minimal amount of path improvement and without the need for the creation of new paths through woodland.

Section 4.2.3 seems to suggest that this method of using existing paths in an informal but focused way will not impact the habitat from trampling. However when this is looked at in conjunction with the statement relating to Access and Footpaths in section 5.3.2. *Visitors will be encouraged to let their dogs off the lead within the SANG, with facilities provided for collection of dog waste.* We are concerned that ancient woodland within the SANG has the potential to be impacted directly and indirectly by the intended use of the SANG. How quickly will recreational impacts on the ancient woodland from inclusion within the SANG be recognised and what monitoring is in place for this in the ancient woodland, as we have no reference to this in section 6 (monitoring) with in the SANG Management Plan?

Reading the SANG Management Plan we highlight the statement from section 2.4.3 which states:
As such there will be 8.15ha surplus SANG capacity, which could serve an additional 424 dwellings arising from other developments.

As a result, does the direct and indirect impact on the SANG and especially the areas of ancient woodland have the potential to increase overtime, if this SANG is intended to serve further developments? How will this potential increase in recreational use be captured in its future management and monitoring, as we see no reference to this in section 6 of the SANG Management Plan.

SWT have concerns that the SANG that is intended to reduce recreational impacts on the designated site of Ashdown Forest SPA has the potential to directly and indirectly damage and degrade irreplaceable habitat contrary to the national policy. Areas of ancient woodland should not be included in the SANG and the SANG should not be designed to accommodate future unknown development.

In conclusion
The application has:
- Failed to adequately address the direct and indirect impacts on the irreplaceable habitats of ancient woodland, which is contrary to national policy and guidance.
- Not made it possible to consider the validity of the proposed Biodiversity Net Gain with the information able to view on the planning portal. As a result, we are unable to question if this is a true reflection on the gains to be achieved.
- Led us to question whether the inclusion of irreplaceable ancient woodland is compatible with SANG guidance issued by Natural England1.
- Not clearly demonstrated how the presence of Protected Species (as surveyed, including; Great Crested Newts, Dormice and Bats Spp.) have influenced the application, this is a material consideration.

We urge Wealden District Council to recognise the historic, current and future value of this site for biodiversity at a time of ecological and climate crisis and reject this application. The landscape must be able to provide the connectivity and function that is so desperately needed if we are to have a healthy and sustainable future. Downlands Farm fulfils this role and it should not be undervalued and compromised. We therefore urge Wealden District Council to consider their responsibilities in

relation to section 40 of the Natural Environment and Rural Communities Act 2006 2 and refuse this application.

WDC Conservation and Design

Heritage considerations
The Council has a duty to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses (Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990) (hereafter referred to as The Act). There are three listed buildings immediately surrounding the site, including Oast Cottage (NHLE 1028090) and Swallows Barn (NHLE 1262256) at Downlands Farm and the grade II* listed Buckwood Grange (NHLE 1194277).

Section 72(1) of The Act relates to planning and conservation areas and requires that Local Planning Authorities pay special attention to the desirability of preserving or enhancing the character or appearance of that area. In this instance, the proposed access for the application site lies in the vicinity of the designated Maresfield Conservation Area. The Draft Conservation Area Appraisal for Maresfield has been published on the Council's website, and provides the most up to-date considerations of the character of the conservation area as designated in March 2017.

The requirements of The Act are reinforced by the National Planning Policy Framework 2021 (NPPF), which at Chapter 16, sets the national agenda for 'Conserving and enhancing the historic environment'. This, in particular, requires the significance of any heritage asset to be identified and assessed that may be affected by a proposal (including by development affecting the setting of a heritage asset) and for this to inform future change in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. Paragraph 200 of the NPPF states that significance of a designated heritage asset can be harmed or lost through alteration or destruction of the heritage asset or through development within its setting. Paragraph 189 of the NPPF states that planning should conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations. Paragraph 193 affords 'great weight' 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.

Under the Historic Buildings and Ancient Monuments Act 1953, Historic England compiles a register of "gardens and other land" situated in England that appear to be of special historic interest. Although the inclusion of an historic park or garden on the register brings no additional statutory controls, registration is a material consideration and local planning authorities must take into account the historic interest of the site when determining whether or not to grant permission and give great weight to their conservation as designated heritage assets under the NPPF. Buxted Park lies to the north-east of the site, and encompasses a scheduled monument relating to the deserted medieval village (NHLE 1002236).

The NPPF Glossary defines a non-designated heritage asset as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. It is commonly agreed that Spring Cottage and Patridges Oast are considered to be non-designated heritage assets. EDP identifies an unlisted historic building – Chicory Cottage – which has the potential to be considered a non-designated heritage asset (if not curtilage listed) by virtue of its historic association to Buckwood Grange.

There are further unlisted historic buildings at Downlands Farm Cottages (historically known as Bridge Farm) which may also have the potential to be considered non-designated heritage assets. It should be noted that the Courts have held that 'preserve' means an absence of harm. The NPPF points out that harm can be either 'substantial' or 'less than substantial' and where harm occurs, it should be given considerable weight as a material consideration in the assessment of planning applications and as part of the balance exercise and in ascertaining if any public benefits would outweigh that harm. This national policy intent is addressed by 'saved' Local Plan Policies EN1 and EN27; Core Strategy Policy SP02; as well as Chapter 12 of the Wealden Design Guide.

Consideration of the proposals
The heritage issue for consideration is the impact of the proposed development on the
significance of heritage assets. The NPPF glossary defines significance as 'the value of a heritage asset to this and future generations because of its heritage interest'. Such interest may be archaeological, architectural, artistic or historic and it may derive '*not only from a heritage asset's physical presence, but also from its setting*'.

Historic England's Good Practice Advice Note 3: The Setting of Heritage (GPA3) gives general advice on understanding setting – i.e. the surroundings in which a heritage asset is experienced – and how it may contribute to the significance of heritage assets and allow that significance to be appreciated. It also sets out advice on how to assess the effects of a proposed development on the significance, whether beneficial or harmful.

Under Step 2 of GPA3's methodology a settings assessment should consider the way attributes of an asset's setting have contributed to its significance in the past (particularly when it was first built, constructed or laid out), the implications of change over time, and their contribution in the present.

In this regard, I do not consider that the Archaeological and Heritage Assessment (AHA) is rigorous enough to support its conclusions (Step 3 of GPA3), particularly in respect of impact on the former Downlands Farm group, but also in respect of the setting of Buckwood Grange which shares an historic relationship with the land within the site, as well as Downlands Farm, the former Bridge Farm (now Downlands Farm Cottages) and Lake Wood which represents part of the designed landscape immediately adjoining the site.

The background set out for the period 'Post-medieval to Modern' within the AHA does not reflect a good understanding the inter-related and evolving mosaic of uses

within the former Rocks Estate associated with Buckwood Grange; nor does it show any informed understanding of Downlands Farm, in terms its relationship with Bridge Farm, Downlands House and Gormanston. Whilst the site and its surroundings were all part of the same owner's landholding, the nuances in terms of how the different uses were related both physically and through association, appear to matter in terms of the contribution that setting makes to their significance. The change over time (or lack thereof) does not appear to be generally well understood – for instance, the evolution (and fragmentation) of the wider Downlands group has not been well understood throughout the 20th century – and therefore cannot inform the understanding of significance of the assets. As a result, it is difficult to see how this could have led to reasonable conclusions about what contributes to significance via setting (without understanding what parts of the surroundings have historically mattered), or how that significance would be impacted through further change.

GPA3 also makes clear that whilst visual considerations often express the extent and importance of setting, the way in which we understand an asset in its setting - be that from the public or private domain - is also influenced by experiential and environmental factors such as noise and activity from other land uses in the vicinity, and by our understanding of the historic relationship between places. Contrary to GPA3, the AHA focuses only on visual impact of the development, with no understanding of the kinetic or experiential attributes which contribute to setting; and with an over-reliance on existing levels of public accessibility. There is no awareness that the proposal will introduce public accessibility from the land itself and open up views and transitory experienced from and towards the assets, moving across the landscape with which they share an historic relationship. This is particularly relevant to the designated heritage assets, and more particularly the relationship between Buckwood Grange and Lake Wood at the southern extents of the site, and in relationship between the agricultural land and Downlands Farm in the north-eastern part of the site. There is nothing to suggest that the indicative layouts in these locations have been informed by heritage sensitivities associated with the setting of these assets.

In respect of the Downlands Farm grouping there is still evidence of a metalled farm track adjoining the former farm buildings – which have readily identifiable and locally distinctive farm typologies – directly linking the farm group and the open fieldscapes to which it is historically related. Whilst not presently a public right of way, it is clearly well-used and easily accessible in its current form. The proposals to provide a public route through the planted 'buffer' which is suggested to adequately protect the setting of these assets, would in fact introduce new experiences of the assets. As regards the conservation of heritage assets, there is an obligation not to prejudice understanding of its significance for future generations. In my view, the buffer, read in the context of parkland style planting and suburban housing development, has no meaningful contribution as the farm buildings will no longer have any tangible relationship to nearby open land (only woodland and modern development). The most common experience of them would be from within this new context, of which the ANA demonstrates no understanding.

The layout proposed closest to the farm and directly at the end of the former track is perhaps the most suburban in form and quality and would introduce adverse change within a portion of the asset's setting which in my view contributes positively to its

significance. At paragraph 5.3 the conclusion that '*this change would be so peripheral to the current experience of the listed buildings, that the implementation of the proposed development would nonetheless preserve the character of* [their] *settings*' clearly demonstrates the inadequacy of the assessment. It also demonstrates no understanding of the experiential qualities of the rural area, which have the potential to be eroded through increased vehicle movements, parking, activity and lighting, in addition to visibility of the development.

In respect of Buckwood House, there is a legibility that the land to the north of Rocks Road, encompassing both Lake Wood and the grounds surrounding Chicory Cottage, formed part of the wider landscaped setting of the house. Historically, a footbridge crossed over the road joining the ornamental grounds surrounding the house with the woodland walks beyond, in the immediate vicinity of the site boundary. Portions of Rocks Road and Snatts Road retain historic stone boundary walls enclosing Lake Wood and Fir Grove (now associated with The Quarry House) which add to the legibility of these historic relationships, and historic maps show clear historic routes through these parcels of land which connect with routes in the parkland and gardens surrounding the house, including the existing gated entrance track to the Woodland Trust's land.

In my view, the relatively tranquil experience of moving through the landscape associated with Buckwood Grange has the potential to be irreversibly altered by the noise, activity and visual qualities of modern housing development immediately on its edge. I note that the settings assessments were carried out in the summer of 2020 and 2021, with no real appreciation for potential effects of such large scale, and closely sited areas of development with regard to seasonal or diurnal changes, as well as the effects of topography in this location in particular. The land within the site has historic associations with both Downland Farm and Buckwood House as part of its wider estate, though the latter is only very briefly acknowledged. In my view, the agricultural land would have played an important role in the setting of the parkscape and how it was appreciated as part of the ornamental and pleasure grounds of the house, and was incorrectly dismissed from further assessment as part of the AHA. As a result, the proposals within Fir Tree Grove at the south-eastern extent of the site, appear to pay little regard to the character of the landscaped grounds surrounding Chicory Cottage, or the serpentine woodland walks which historically traversed the woodland, opting instead for an overtly straight path and what appears to be highly engineered interventions within the woodland. This appears to be the only driver for demolition of Chicory Cottage, which retains some historic visual character and as the former butlers house to Buckwood Grange, further evidences the intrinsic historic relationships, and could continue to do so. It is clear that an understanding of significance has not informed the proposals here, nor have opportunities to enhance or better reveal significance been taken.

I have no reason to disagree with the finding of less than substantial harm, at the lower end of the scale, to the Maresfield Conservation Area (as set out in paras 5.35-5.46 and 6.7-6.9).

Having reviewed the extensive planning history, I agree that the heritage sensitivities here are unlikely to be prohibitive to development alone. However, at Paragraph 206, the NPPF requires Local Planning Authorities to look for opportunities for new

development within the setting of heritage assets to enhance and better reveal their significance. I do consider that a proper understanding of setting and significance, and consideration of the wider relationships between the assets, offers an opportunity to reflect the NPPF's design objectives (Paragraph 130), as well as respond positively to the setting of, and perhaps enhance the significance of, the heritage assets.

Taking into account my discussion above, I consider that there would be a less than substantial harm to the significance of heritage assets through the proposed development within their setting.
At present, in the absence of any mitigation evidenced in the indicative proposals, I consider that this would be at the higher end of less than substantial harm, though could be reduced through more thorough and considered understanding of significance and amendments to the design in line with this understanding.

In summary, the NPPF recognises that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance. Great weight should be given to the conservation of designated heritage assets, including any harm or loss of significance through development within their setting. The NPPF also places great importance on development being of good design and responding to local character to ensure the integration of new development into the existing environment. Where harm is considered to be less than substantial, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. It is not considered that any heritage benefits would arise from the present scheme,
nor that planning conditions could be capable of sufficiently mitigating that harm.

Therefore, it would not satisfy the aims of the National Planning Policy Framework as regards the conservation of heritage assets, nor would it 'preserve' the significance of the listed buildings, including one grade II* listed building and two grade II listed buildings.

Woodland Trust

Objection – deterioration of ancient woodland, veteran trees and Woodland Trust-owned site, Lake Wood
As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering over 30,000 hectares and we have over 500,000 members and supporters. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on ancient woodland and ancient and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of the application to the local authority.

Woodland Trust Position
The Trust **strongly objects** to planning application WD/2022/1637/MEA on the basis of deterioration of ancient woodland and veteran trees, and adverse impacts on our Lake Wood site. The ancient woodland sites are designated as a mix of ancient semi-natural woodland (ASNW) and plantation ancient woodland sites (PAWS) on

Natural England's Ancient Woodland Inventory (AWI). The specific woods are detailed below.

We have particular concerns relating to Lake Wood, a Woodland Trust-owned site that borders the southern edge of the development site. Further details of our concerns in respect of ancient woodland, veteran trees and our site are provided in this letter, though to summarise our main concerns relate to the following:

• Intensification of human activity and recreational disturbance on ancient woodland, veteran trees and Lake Wood, particularly the inclusion of ancient woodland with designated SANG.
• Fragmentation of ancient woodland sites from adjacent semi-natural habitats.
• Noise, light and dust pollution affecting habitats and important flora and fauna.
• Threats to long-term retention of notable and veteran trees from increased safety concerns, and removal of important habitat features
• Adverse hydrological impacts across the site.
• Wider impacts on ecological connectivity and functioning of site, and concerns regarding the overall suitability of the site for development purposes.
• Cumulative effect of the above impacts resulting in long-term deterioration of the natural landscape.

Ancient Woodland
Natural England and the Forestry Commission, the Government's respective bodies for the natural environment, define ancient woodland as follows within their standing advice1:
1 https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions
2 http://www.ati.woodlandtrust.org.uk/
"*Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It is a valuable natural asset important for: wildlife (which include rare and threatened species); soils; carbon capture and storage; contributing to the seed bank and genetic diversity; recreation, health and wellbeing; cultural, historical and landscape value. It has been wooded continuously since at least 1600AD. It includes:*
• *Ancient semi-natural woodland* [ASNW] *mainly made up of trees and shrubs native to the site, usually arising from natural regeneration.*
• *Plantations on ancient woodland sites* – [PAWS] *replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi"*

Veteran Trees
Natural England's standing advice on veteran trees states that they "*can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats. A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value."* We consider that not all veteran trees are ancient, but all ancient trees are also veteran trees.

We note that a number of trees have been identified within the arboricultural survey as being veteran specimens. There are no trees on site recorded as veteran on the Trust's Ancient Tree Inventory2, though this is not unexpected as the inventory does not represent a comprehensive record of ancient and veteran trees across the UK. We have provided further detail below with respect to veteran trees that require protection.

Planning Policy
The National Planning Policy Framework, paragraph 180, states: "*When determining planning applications, local planning authorities should apply the following principles:*

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons63 and a suitable compensation strategy exists;"
Footnote 63, defines exceptional reasons as follows: "*For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat."*

As there is no wholly exceptional reason for development in this location then the development should only be allowed where it complies with national planning policy. At present, we consider that this is not the case and the application should be refused.

The council should also have regard to local planning policies and decisions. For example, 'Policy EN13 Ancient semi natural woodland' aims to protect the ecology of Ancient Semi-Natural Woodlands and states: "*The Council will resist development proposals that involve the clear felling or otherwise prejudice the ecology of Ancient Semi-Natural Woodlands, as defined by English Nature*."

We would also question the suitability of the site for new development. We understand that other stakeholders have also flagged this concern and would like to draw the council's attention to Wealden District Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) report from 20193. It was concluded that 'Land at Downlands Farm, Snatts Road, Uckfield' (site reference: 137/1410) is not suitable for development, with the document stating: *"This is an area of attractive rural landscape on the fringes of Uckfield, containing much ancient woodland. Development of the site would entail considerable adverse landscape impact and would compromise its nature conservation integrity and biodiversity interests. In addition, development of the site is unacceptable on transport sustainability grounds and because of its relative inaccessibility from the town centre. The site was also subject to an appeal which was dismissed by the Secretary of State in 2008 due to specific site constraints."*

3https://www.wealden.gov.uk/UploadedFiles/A29._Strategic_Housing_Economic_Land_Availability_Assessment_reduced-1.pdf

Impacts on Ancient Woodland
The development proposed as part of this application would involve the creation of a new residential development of a significant size and scale (400+ dwellings). Where

development is sited in close proximity to ancient woodland there is the potential for the woodland and its wildlife to be adversely affected by this change of land use and the associated impacts of increased activity. This application has the potential to impact on several areas of ancient woodland, resulting in their long-term deterioration. We consider that the following areas of ancient woodland could be subject to adverse impact:

• Longwood Gill (or Long Gill Wood) (grid ref: TQ 46597 22117)
• Shermanreed Wood (TQ 46824 22284)
• Lake Wood (TQ 46454 21797)
• Thirty Acre Shaw 2 (southern wood alongside A22) (TQ 46397 22179)
• Thirty Acre Shaw (TQ 46486 22354)
• Fir Tree Grove (TQ 46730 21758)
• Part of Thirty Acre Wood west of A22 (TQ 46246 22110)
• Budletts Wood (TQ 46803 22530)

Natural England and Forestry Commission have identified impacts of development on ancient woodland or ancient and veteran trees within their standing advice (please see the annex at the foot of this document for the full range of impacts outlined). This guidance should be considered the Government's position with regards to development impacting ancient woodland, although Natural England and Forestry Commission should still be consulted for specific comment on this application.

It must be recognised that the entirety of the site, from ancient woodland to ghylls to grassland are intrinsically linked at an ecological level. This landscape of natural habitats and their wildlife populations are functionally dependent on each other. Below we have set out our main areas of concern in respect of ancient woodland.

Recreational pressure
We consider that the size and scale of the development (400+ dwellings) has the potential to result in significant indirect impact on ancient woodland. The change in land use and increased human activity (as well as the impact of domestic pets) is likely to adversely affect the ancient woods and their wildlife through pollution and disturbance during both construction and operation. Our concerns align with those detailed in government's standing advice. We also have concerns with respect to the inclusion of ancient woodland within the site's SANG designation, which are discussed further below.

Fragmentation and isolation
Fragmentation is another significant concern for ancient woodland on this site considering the existing and proposed residential areas. The proposed development would further encase sides of ancient woodland areas within the site that are not presently developed and that currently adjoin semi-natural habitat. This is particularly the case for Longwood Gill, which would be largely encased by urban development and isolated from other natural habitat, impacting its wildlife populations. The introduction of significant amounts of new infrastructure and loss of semi-natural habitat for housing, roads and other infrastructure will result in a significant barrier to

commuting and foraging routes for wildlife, permanently altering the functionality of the existing network of habitats.

Hydrological impacts
We have concerns in relation to the potential impact of the development on the hydrology of the ancient woods, the watercourses and the wetland habitats present both on and off site. With development at a high elevation than many of the ancient woodland ghylls within the site and the introduction of a significant amount of hard-standing, the woodlands and their wet features are likely to be subject to increased urban run-off and associated pollutants/contaminants. We do not consider that enough consideration has been afforded to this and it is unclear how such impacts would be avoided or mitigated. While impacts may be monitored after the development has been built, this would be too late to prevent adverse impacts on the ancient woods and their hydrological condition.

Main access
We have concerns with respect to the main access and roundabout proposed for the site. While the applicant has stated that all areas of ancient woodland would be retained, this access road would result in the loss of important woodland habitat and sever important connecting habitat between Lake Wood and other areas of ancient woodland within the development site. The proximity of this access is also likely to result in indirect impacts on nearby areas of ancient woodland on both the eastern and western side of the A22, with impacts during both construction and operation. We would appreciate clarification around whether a new junction/roundabout at this location is likely to result in increased traffic emissions and other airborne particulates affecting the nearby ancient woodlands. Emissions associated with traffic, such as nitrogen oxides (NOx) and ammonia (NH3) can severely adversely impact ancient woods and trees and their associated wildlife4. Furthermore, while the woodland areas to be lost in this area are not designated as ancient woodland, they should be considered valuable habitat regardless and their loss is not insignificant.

Emergency access
We have concerns in respect of the emergency access road that would cut through a small sliver of woodland between the designated ancient woods of Thirty Acre Shaw 3 and Shermanreed Wood. As noted by the applicant, construction of this emergency access would impact the root protection areas (RPAs) of trees on the edge of the ancient woodlands of Thirty Acre Shaw 3 and Shermanreed Wood. Indeed, this emergency access would encroach within what should be a buffer zone for these areas of ancient woodland and likely result in these ancient woods being subject to adverse impacts of construction activity. This clearly contravenes national planning policy and government guidance. Both the main access and emergency access would act to sever the connectivity of areas of ancient woodland from each other and other semi-natural habitat on site.

SANG designation
We are concerned by the inclusion of areas of ancient woodland (Shermanreed Wood and Budlett's Wood) within the application's SANG designation. We wish to outline that the Trust does not oppose the use of ancient woodland for public access, indeed the Trust's own ancient woodland sites are all open to public access;

however, any usage should be provided sensitively to ensure that these irreplaceable habitats are not irrevocably damaged through increased recreational use. Given the nature of SANG – the principle being that SANG was first introduced as a means of diverting people away from sensitive habitats – we consider that the use (and therefore potential damage) of ancient woodland for this purpose is inappropriate and must be avoided. While we recognise ancient woodlands are not statutorily protected sites, they are recognised for their sensitive nature regardless.

This is supported by wording within the 'Guidelines for creation of SANGS' document produced by Natural England5, which states: "*The identification of SANGS should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANGS, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the development plan."*

As highlighted within Sussex Wildlife Trust's response to this application, there are some concerns with respect to the use of ancient woodlands as recreational spaces and how visitors will be encouraged to use the proposed SANG. We are sceptical in respect of how these woods will cope with the additional recreational use from 400+ new houses and increase in local populations and the mitigations proposed to deal with increased use. We commend the fencing off of sensitive areas of ancient woodland, including Longwood Gill and Shermanreed Wood and plans to manage these sites for biodiversity purposes, as well as implementation of interpretation boards. However, we remain concerned by plans to encourage the use of other areas of ancient woodland (that are presumably considered to be 'lower value') for recreational purposes and would expect to see detailed plans to reduce such impact if it is found that the ancient woods within and adjacent to the site are being adversely affected.

Boardwalk through Fir Tree Grove

We have some concerns in respect of a boardwalk proposed by the applicant through an area of ancient woodland (Fir Tree Grove). We understand that the applicant has stated that the boardwalk would be routed through areas of lower value in respect of ground flora and that any important species would be moved elsewhere within the woodland. It is difficult to see how such an approach would have benefit for the ancient woodland, and would more realistically result in damage to this ancient woodland area from the construction of the boardwalk, the loss of available habitat around the boardwalk, and intensified management of the ancient woodland and its trees for health and safety purposes. We would appreciate clarification as to why a footpath is required in this location and why a boardwalk has been proposed as opposed to other types of path.

Impacts on Veteran Trees

From the documentation provided, we have identified the following trees (in line with the applicant's identification process and our own observation of the tree survey) as being of importance and requiring protection in line with national policy, government guidance and BS5837 guidelines (we have also provided comments on particular trees regarding their proposed management):

• 3001 – ash – veteran
• 3003 – ash – veteran
• 3004 – ash – veteran
• 3005 – ash – veteran
• 3006 – ash – veteran
• 3007 – gean – veteran
• 3021 – oak – veteran
• 3026 – oak – veteran
• 7041 – beech – veteran
• 7053 – oak of 1210mm listed as possible future veteran
• 7054 – coastal redwood of 1750mm listed as possible future veteran o As above for the other future veteran.

• 7058 – sweet chestnut of 1180mm listed as possible future veteran o As above for the other future veterans

• 7075 – oak of 1250mm listed as excellent specimen o While this oak may not have the features presently to qualify as a veteran, it is likely a notable tree and future veteran given the appropriate time and space to develop. As much space should therefore be afforded to this tree and its rooting environment as possible.
• 8036 – oak – veteran

Future veterans must be afforded suitable space to avoid their loss or deterioration, protecting their rooting environments. While not required through guidance or policy, we consider that the application of a buffer zone in line with veteran tree recommendations should be considered to ensure future veterans have the space required for their long-term vitality.

o Recommended to "*stabilise dead wood according to occupancy levels beneath the crown*". We would ask that measures are implemented to prevent ingress of persons beneath its crown.

o As above comments for future veterans.

o Recommended to "*stabilise dead wood according to occupancy levels beneath the crown*". We would ask that measures are implemented to prevent ingress of persons beneath its crown.

- • 8038 – Monterey pine of 1540mm listed as notable
- • 8039 – beech – veteran (relic) tree
- • 8045 – oak of 1200mm listed as notable
- • TG3013 – ash – veteran coppice

While there are clearly a number of veteran and other important trees present within the development site, it does not appear that any of those identified as veteran by

the applicant would face direct impacts from the proposals. We ask that the council ensures that appropriate buffer zones have been afforded to all of the above trees and that the council is satisfied with proposed management to ensure avoidance of their deterioration. While there would be no direct loss of veteran trees, we consider that they do form an important part of the landscape and have a role in the ecological functionality of the wider natural landscape and to wildlife populations that are present within and adjacent to the development site.

We would question the comments from the applicant that "*Veteran trees are not generally susceptible to other types of effects that might arise during construction, such as those arising from dust deposition, or light pollution or changes in air quality.*" While studies conducted in the UK are rather limited in respect of indirect effects on trees, international studies have shown that dust load on trees does have negative impacts on leaf growth and can induce changes in physiological and micro-morphological characteristics of trees. Such changes could be particularly impactful to veteran trees. With regards to other indirect effects of construction and operation of residential development, impacts such as light, noise pollution and air quality changes do have the potential to adversely affect species associated with the old-growth and deadwood habitat of such trees, i.e. lichens, fungi, bats, invertebrates, etc., and should therefore be considered also. We would expect to see further information provided on whether such effects would adversely impact veteran trees on site.

Furthermore, increased human activity in the vicinity of veteran trees will increase the need to manage such trees more intensively so as to reduce associated health and safety risks. As stated above, veteran trees typically feature significant deadwood habitat of great value for biodiversity, e.g. retained deadwood in the crown, broken/fractured branches and trunk cavities/wounds, and the removal of such features in the interests of managing safety risks can result in loss of habitat and/or consequential decline or removal. Therefore, where such trees are to be located within public areas, other mitigations should be considered to reduce human activity around these trees, i.e. restricting access within their canopy area and rooting environment.

Our concerns regarding the increased risk that veteran trees can pose when more exposed to human contact is supported by the guidance within David Lonsdale's 'Ancient and other Veteran Trees: Further Guidance on Management' (2013), which states in paragraph 3.5.2.1 *"… avoid creating new or increased targets: as happens for example following the construction of facilities (e.g. car parks or buildings) which will bring people or property into a high risk zone. Not only does this create targets, it also harms trees and therefore makes them more hazardous*".

Impacts on Lake Wood, Woodland Trust-owned Site

Our Lake Wood site, which abuts the southern boundary of the development site is an area of ancient semi-natural woodland that is currently accessible to the public. At present, Lake Wood is used by local residents; there is limited access to the woodland as our site does not have an associated car park and is only accessible via existing footpaths. The proposed application would constitute an additional 400 plus residential dwellings within the local area, increasing the local population near to

our ancient Lake Wood site by a significant amount. The change in land use, creation of hundreds of new dwellings and new parking areas would all act to increase visitor pressure on our site and with it, associated disturbance.

While the Trust encourages public enjoyment and access of ancient woodland, it must be managed sensitively to prevent damage to its important ecological features and avoid long-term deterioration that often occurs where urban development is in close proximity to ancient woodland.

The applicant has recognised that the proposals would likely result in indirect effects that they consider would lead to 'short-term' minor degradation of the woodland and wetland habitats within Lake Wood. We have serious concerns regarding the impact of indirect effects within the ancient woodland and consider that the 15m buffer applied between the woodland edge and development is insufficient to prevent impacts in both the long and short-term. While impacts such as airborne pollution, are likely to be more prevalent during the construction period, consideration must be given to how the operational phase of the development will impact our ancient woodland.

The change in land use and increase in local population in close proximity to our site and with easy access to our site will undoubtedly exacerbate the adverse impacts of recreational pressure that Lake Wood is already subject to. In particular, the creation of new car parks on site is likely to generate additional traffic and footfall, as well as that expected from future occupiers of the residential development.

Therefore, we request that the largest possible buffers are implemented between the development and the boundary of Lake Wood, with a minimum of 50 metres being considered. We understand that a break in the mowing regime for the site has resulted in some natural regeneration in areas with oak, birch, willow and blackthorn coming through and forming scrubby edges to the woods and hedges across the site. We would expect to see allowance for wide strips of scrubby habitat adjacent to Lake Wood as part of any mitigation plans to avoid deterioration of our site and prevent informal and unwanted access points and desire lines being created.

As mentioned above however, the Trust has fundamental concerns with the change of land use proposed for this site, and the impact this would have on the wider ecological functionality of the area and on our own Lake Wood site. Therefore, we remain opposed to development in this location. We would refer the council to the submission from Dr Martyn J. Stenning in this respect, as a professional ecologist with long-standing experience of studying and observing the ecology of the area within and around the development site, with particular expertise and knowledge relating to Lake Wood's ecology.

Mitigation

Considering the size and scale of the development and its location in the wider landscape, with several distinct areas of ancient woodland and other wooded habitat in proximity to the development, we consider that extensive mitigation measures are required to prevent ancient woodland and veteran trees are protected from damage and deterioration. Natural England and Forestry Commission have produced

guidance on mitigation measures to alleviate impacts to ancient woods and trees within their standing advice (please see the annex at the foot of the document).

Additional mitigation approaches are also outlined in our Planners' Manual6; these measures would help ensure that the development meets policy requirement and guidance and include (we recognise the applicant has already implemented some of these):

• Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.
• Measures to control noise, dust and other forms of water and airborne pollution.
• Woodland restoration – such as in PAWS.
• Sympathetic design and use of appropriate lighting to avoid light pollution.
• Producing and funding an access management plan for the woodland, and/or providing alternative natural greenspace to reduce additional visitor pressure.
• Introduction of sympathetic management for neglected woodlands or trees.
• Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met.

Regarding the proposed buffer zones to ancient woodland, we understand the applicant has proposed minimum buffers of at least 15 metres between areas of development and ancient woodland. The minimum 15m is accepted as a means of protecting the roots of trees at the edge of the ancient woodland, however Natural England consider that larger buffer zones should be considered where impacts are likely to occur beyond this distance. In this case the buffer zones should be proportionate to the scale of the development.

We consider that the applicant must implement **buffer zones of at least 50 metres** between any area of development and ancient woodland, particularly in respect of the Trust's own ancient woodland, Lake Wood. The council should take account of Natural England's recent recommendation for a 50m buffer to ancient woodland for a large-scale housing development in Basingstoke7. Consideration should also be given to reports produced by the Woodland Trust8 and the Yorkshire Wildlife Trust9, both of which detail the impacts that can be felt by ancient woods from residential development and the need to maintain distances to avoid such impacts.
With respect to veteran trees, Natural England and Forestry Commission's standing advice should be followed to ensure suitable buffer zones, with incursions into these zones from any infrastructure entirely avoided.

Conclusion
Ancient woods and veteran trees are irreplaceable habitats and must be protected at all costs. Any damage or deterioration to these habitats must be avoided and appropriately mitigated in line with local and national policies, and government guidance.

In summary, the Woodland Trust would like to register a **strong objection** to this application on the basis of deterioration of several areas of ancient woodland, including our own Lake Wood site, as well as potential for adverse impact on veteran

trees, local wildlife populations and the wider ecological functioning of this natural landscape.

We anticipate that local habitats are likely to be subject to considerable indirect impact, namely in the form of fragmentation, pollution and disturbance, and will face long-term deterioration as a result. As such, this application contravenes both local and national planning policies designed to protect natural landscapes and irreplaceable habitat. We ask that Wealden District Council considers this application for refusal.

WDC Drainage

Flood Risk
As previous.

Surface Water Drainage
There are no adopted, public surface water sewers in the vicinity of the site so this method of drainage is unavailable.

Infiltration is the first recommended drainage method in the SUDS hierarchy but the mixed, underlying mapped geology of the site and the presence of watercourses and ponds on the surface suggests that this may not be a usable solution for this site. I note that the applicants have carried out infiltration testing which confirmed that the percolation rates were has been carried out.

The site drainage proposals comprise a series of swales and attenuation ponds directing water to the existing ordinary watercourses. It should be noted that drainage works will **not** normally be allowed in areas of Ancient Woodland even if directional drilling is used. Given the extent of this Ancient Woodland across the site, this may require a substantive redesign from what is presently proposed. The applicants are advised to discuss the matter with the Council's arboriculturalist as soon as possible, based on the ideas outlined in the arboricultural and ecological consultant work submitted as part of the application.

The Council does not wish to see areas of land raise just to accommodate filter trenches or swales and would wish for such areas to be redesigned. Given the presence of groundwater c2.0m below the surface it will be necessary to line the ponds. There is no indication of the condition and size of the existing watercourses and their capacity (or not) to carry the water from the site.

In considering the drainage principles proposed for the site, the Lead Local Flood Authority, ESCC, will require full detail in the drainage calculations used to design the system and Wealden, as the planning authority, would support this request. The calculations should prove that the final design can accommodate the site runoff rates for the standard 1 in 100 year rainfall event plus 45% climate change. I note the need for the new 45% rate is acknowledged in the Flood Risk Assessment. I note that initial calculations have already been provided.

It is stated that note that the maintenance activities for the surface water drainage system are to be undertaken by a site management company. A full maintenance

plan will be required when the drainage design is finalised and before first occupation.

Notes
Any new outfall or outfalls to an ordinary watercourse will require Ordinary Watercourse Consenting from the Lead Local Flood Authority, over and above any planning permission which may be may be granted.
Provision of the foul sewage arrangements is for Southern Water to comment on.

Conclusion
In my opinion, the new information provided within the Technical Note – Response to Drainage Comments makes valid points acknowledged above. In surface water terms, the information is largely satisfactory. However, the key question is whether approval can be obtained from the Council's arboriculturalist for the works in the ancient woodland. I would therefore **maintain my holding objection** to this application until this point is determined.

Should this matter be overcome to the satisfaction of the Council's arboriculturalist and you are minded to allow planning permission, I would wish to see the following **conditions** applied namely:-.

"No development shall take place until full details of the surface water drainage scheme, have been submitted to and approved in writing by the local planning authority. The surface water drainage scheme should be confirmed as deliverable by an assessment of the site's potential for disposing of surface water by means of a sustainable drainage system. The submitted details shall include the following:
i. Supply detailed plans, layouts and sections of the proposed drainage system and pollution/silt control devices and construction details of any non-standard features.

ii. Provide a full management and maintenance plan for the development which shall include the setting up of any necessary company to secure the operation of the scheme throughout its lifetime or evidence of adoption by the PCWLMB.
iii. Supply full hydraulic calculations to the correct level of climate change (45%), to the satisfaction of the Lead Local Flood Authority.

iv. Provide evidence by means of a photographic survey or similar that the receiving watercourses are in sufficient condition to receive the calculated flows.

NOTE: Attention should be given to non-statutory technical standards for sustainable drainage systems, the ESCC "Guide to Sustainable Drainage Systems in East Sussex" and the total costs of implementing the drainage scheme, that is design, construction and maintenance costs.

REASON: To reduce the risk of flooding, both on and off site, to improve and protect the water quality and improve habitat and amenity having regard to the guidance set out in the National Planning Practice Guidance and at paragraphs 163 and 165 of the NPPF and any local plan policies where appropriate according to the local planning authority, for example WCS14 of CSLP, saved policy CS2 of the Wealden Local Plan."

Ukfield Town Council

Further to members of the public speaking, the Chair then asked for comments from members of the Plans Committee:

Cllr. Jackie Love – reiterated that the Plans Committee were here to represent the views of the community and their own views based on their review of the documentation presented by the developer on the planning portal.

Councillor Love thought it was good to see the proposals for affordable housing but recognised that the quality and type of housing could change in the planning process.

She had considered and compared this with previous applications for the site and the report of the Secretary of State. Councillor Love referenced the 2019 SHELAA and also Professor Beebee's demonstration of how site proposals were contrary to the NPPF. She felt that damage must be avoided, the site should be protected. She referenced a couple of boreholes that had already been drilled into the site and from this new springs were appearing. She felt the demolition of Chicory Cottage must be refused.

Lot 1 was formerly a Butler's dwelling from the mid to late 1800s and this was illustrated on the William Figg map of 1829. The removal of this building and risk to historical sites of importance on Downlands, the proposals were contrary to Section 66(1) of the Planning (listed and building conservation areas) and also NPPF Chapter 16. With extreme urgency the Conservation and Design officer(s) needed to look at the property, and provide the same level of protection status as Buckswood Grange. It needed assessment, alongside the area within the old Rocks estate to ensure all heritage can be protected.

In terms of highways and access, many points had been raised by residents. Unfortunately the ES Highways report had not yet been displayed. There was often mention within the application documents of the railway station and Buxted Parish Council had picked up on the concern of increased rail use from this small station as a result. The local area was aware of the pressure now placed on the lane leading to the Horsted Green SANGs in Little Horsted parish, so Councillor Love had concerns for the increased traffic and usage of Snatts Road.

Watercourses would be impacted and existing corridors broken. Councillor Love listed the objections from partner agencies, local action groups, professors, scientists and professionals in this field and for that reason felt the views were clear.

Cllr. Duncan Bennett – expressed that there was very little he could add to feedback received that evening. Although he understood the passion and feelings in the room, he was also aware of the role Plans Committee' members had as statutory consultees and that their response needed to consider planning terms and considerations. He was in his sixth decade now of living in Uckfield, and in the area of the town he lived, they had fortunately been able to retain some of the original character. This development was outside of Uckfield's development boundary, and out of keeping with the local streetscene and landscape. He felt the development

proposals were destructive to the character of the town, and these were valid planning considerations for objecting to this proposal.

Cllr. Ben Cox – wished to thank everyone for coming to the meeting. Councillor Cox, referenced the number of development proposals coming forward in and around Uckfield and the 2,500 properties this would add to the existing 6,000, with Uckfield South being hardest hit. He felt the development proposals for Downlands Farm were out of keeping with the local character of that area, the landscape and had concerns with regard to flood risk. Without a Local Plan, Uckfield was getting attacked. He referenced traffic congestion within the town and the cut throughs and lanes which were used as diversions if one road was blocked. He didn't feel Uckfield had the facilities or infrastructure to support the development and felt that the SANGs was essentially an unnecessary tax when beautiful green space was already present. It appeared to be overdevelopment of Uckfield, and the concerns raised with regard to sewage and drainage were of most importance. He therefore concluded that he would vote this application down, and therefore object. He encouraged members of the public to write to their MP, and express their concerns.

P55.09.22 Cllr. Karen Bedwell brought together the views of the public and committee members; putting forward a proposal which was RESOLVED by members to object in the strongest of terms to this application on the following grounds:-

The application was for outline planning permission with all matters reserved but access. Committee members felt it was not possible to look at access alone and would therefore ensure that within the committee's response they considered what was required to achieve sustainable development in line with the NPPF Section 2 – and consider the economic, social and environmental objectives of this application. Ensuring the committee reflected a balance of views, it was recorded that the developers had listened to some of the feedback they received to their previous application.

- developers had reduced the number of houses onsite to provide a better balance between the built and natural environment;
- they had set out to comply with Wealden DC's Affordable Housing Delivery Plan and provide 148 units of affordable housing for local people in the Uckfield area with a particular emphasis on smaller units which met local housing need;
-there were some advantages to the development being on the periphery of the town, in that a certain element of the traffic flows would travel outside of Uckfield and not add to existing levels of congestion;
- the inclusion of foot and cycle ways would assist with providing more sustainable modes of transport for new home owners;

However it was recommended that Uckfield Town Council had found no persuasive consideration to justify support for this application. It was also questioned whether other than reducing the number of homes onsite, if the developer had made significant enough of a change to the material considerations put forward in the previous application (Section 70a of the Town and Country Planning Act 1990).

Uckfield Town Council strongly objected to the application for outline planning permission for up to 424 homes, and the overall principles of development and highway/pedestrian access for the following reasons:

(i) Lack of stakeholder engagement

At no point in the pre-application stage or during this consultation process, had the developers approached Uckfield Town Council to discuss their proposals;

the developers refused to provide printed reference copies of the application material for Uckfield Town Council and Wealden District Council;

documents were filled with inaccurate desk-based research– for example DEFRA's magic maps did not accurately pick up the UK Biodiversity Action Plan priority habitats in this area;
(ii) Location and linkages between the proposed development and Uckfield Town

The setting and proposed layout of the development did not demonstrate any consideration for connecting the site with the town of Uckfield. This had been something raised previously and still not been addressed. The development would face away from the town at the far north west boundary and separate residents from the northern residential areas of Hunters Way, Rocks Park and Snatts Road. The main access point onto the A22 would naturally encourage residents to travel elsewhere for work and retail rather than supporting their local market town. This was a key reason for objecting;

Development proposals for this site were contrary to:

- EN17 of Wealden DC's policies;
-Wealden DC's 2019 SHELAA;
-the Planning Inspectors report of 2008/09 stating that 'Downlands felt comparatively remote from any town, and more part of the countryside than of the urban fringe'

(iii) Concerns with main access point into site and highway/parking proposals

There were serious concerns on the placement of the main access point and roundabout to enter and exit the proposed development site. The Site Access Block Plan showed that the roundabout was metres from the main watercourse of the Shortbridge Stream and northern boundary of Lake Wood. Uckfield Town Council held previous traffic survey data by ESCC from 2019 (pre covid) and average daily traffic flows for traffic travelling north of Copwood roundabout was in the region of 23,000 vehicles and travelling south in the region of 20,000 vehicles. With all development planned for Uckfield, the additional cumulative impact of traffic would be further exacerbated by the increase in popular retail outlets at the Ashdown Business Park (M&S and Home Bargains). The close proximity of the roundabout to the stream was a second key reason for the Town Council objecting. Shortbridge Stream was a tributary of the Sussex Ouse and a Salmonid designated stream. The location and construction of this roundabout would have a detrimental impact;

No thought has been given to reinstate or define the footpath(s) used by local residents for 50 years across the site, with views of the High Weald and Ashdown Forest?

The proposed access point to the SANGs car park from Snatts Road was of great concern. Snatts Road was still a ‘lane,’ there were no line markings, the pavement was narrow or non-existent and the proposed placement of the access point, already suffered from poor visibility. Cars parked outside the properties of Claremont Place, and pulling out of the properties along Snatts Road in that location, was very difficult.

(iv) Environmental impact on important ecological habitats – SSSI, ancient woodland, wetlands and Local Wildlife Sites

The site comprised of grade 3 agricultural land, interlaced with extensive areas of ancient woodland. Two wooded ghylls provided natural divisions. Part of the site adjoining Paygate Wood and lower sections near to Budletts Wood were designated as parkland in the nighteenth century. And, owing to the ghylls, the site had complex topography, with adjacent Budletts Commn comprising a mixture of degraded heath, shrub and open green space. Budletts Common was a medieval and critical natural capital environment and met county importance.

The Planning Inspector of 2008/09, stated in their conclusion that “the rural landscape character and quality of Downlands are different from, and qualitatively superior to those of the other two sites considered at that time.’

Historical maps showed that Views wood through to Lake Wood was conjoined ancient and wet woodland (linking Views Wood, through to Paygate Wood, to Shermanreed Wood, to Thirty Acre Wood). There was no break, and the biodiversity of the site will still hold this ecological value.

Open spaces north of Snatts Road were evident of wet peatlands, acid grasses, and ancient and wet woodland nestled between a designated SSSI of Buxted Park, a medieval common of Budletts Common, ancient woodlands, Lake Wood and Shortbridge stream.

Development proposals were considered contrary to:
-NPPF 15 (174(a);
-Wealden Local Plan 1998;
-NPPF 15 (179a);
-NPPF 15 (182)
-NPPF 15 (185c)
-NPPF 15 (180c)

Partner agencies such as the Woodland Trust, Sussex Wildlife Trust and Native Space Newt Officer had strongly objected, and the Lords amendment to NPPF, suggested larger buffer zones for irreplaceable habitats.

The Town Council would agree that the provision of the SANG would be to reduce visitor numbers to the Ashdown Forest and subsequent environmental impact, yet damage more local irreplaceable habitats in Uckfield.

Downlands Farm was a very fragile and important ecosystem and at a time of climate change emergency should be protected and considered within the development of the new Local Plan, and an SSSI application should be supported.

(v)Limited consideration of amenity space and facilities to support the size of development and north of town

The proposed amenity open space was very small for the scale of the demonstrating the lack of engagement the developers had with the local community and understanding of the need for sports facilities, community facilities, allotment space, support with extending the local cemetery;

Sport England had also requested that CIL monies be directed to sporting needs in this area; (vi)Concerns with drainage, groundwater and risk of foul flooding

Partner agencies such as Southern Water, Environment Agency, the ESCC Flood Risk Team and Wealden DC's Drainage Officer had highlighted their concerns, requesting more information or conditions to be applied, to:
-mitigate any potential risk of foul flooding;
-mitigate the risk of ground water pollution;
-requirement for an updated drainage plan;
-need for further grounds testing and that drainage works would not normally be allowed in ancient woodland.

(vii)Housing mix

There was no provision for elderly and support services such as assisted living;

Wealden DC's Housing department clarified the definition of affordable housing units and required mix for first homes, social rented, affordable rented and shared ownership. They had also recommended the provision of 2 bed houses instead of 2 bed flats.

The Town Council and local residents of Uckfield understood that in the terms of the last will and testament of Clarence Preston, there was a requirement to obtain permission to develop the land or a part or parts of it as a building or industrial estate.

A much revised proposal would need to be put forward to reflect the sensitivity of the site. A smaller scale plan which would meet the needs of the Uckfield community and did not centre heavily on housing without the necessary infrastructure, in line with WCS7 of Wealden's Planning Policies.

Nothing had changed from the Planning Inspectors report in 2008/09 and refusal, and in fact over the 14 years the landscapes, sites of biodiversity and geological value had been enhanced rather than depleted.

Isfield Parish Council

objects to this application on the following grounds
i.
The housing quota for Uckfield established in the 2013 Core Strategy has already been met.
ii.
No consideration has been made for the effect this development will have on the surrounding villages.
iii.
This application contributes to the already significant overdevelopment of this area and changes the nature of it. Councillors ask why the rights of those who want to move to the area override the rights of those who already live here.
iv.
The existing infrastructure cannot cope as it is. There are regular water shortages and sewage outfalls into the rivers and seas. The roads are overcrowded and doctor's lists are closed to any new patients.

Fletching Parish Council

Fletching Parish Council STRONGLY OBJECTS to this planning application on the following grounds:

1. The Council is very concerned about the impact that the application would have on the local roads network. In particular Rocks Road and Snatts Road would see a marked increase in traffic due to the vehicular access to the proposed SANGS (Woodland Park) being located off Snatts Road. Both those roads are narrow country lanes and any increase in traffic would have a detrimental effect on the amenity of the area and give rise to significant road safety issues, particularly at the already dangerous junction of Rocks Road and Snatts Road. Shortbridge Road would also see an increase in traffic movements as cars cut through from the A272 to the car park for the SANGS in Snatts Road. This is also a narrow twisting country road that was never designed to deal with the potential traffic volume that would arise if this application was approved. The increased traffic flow would also have a detrimental effect on the residents of Shortbridge and Piltdown.

2. The close proximity of the new roundabout to Shortbridge Stream, which is an EU designated Salmonid and Cyprinid waterway supporting rare fish and eels from the Sargasso Sea, would result in a severe risk to the ecology of the area.

3. There are inadequate plans for sewerage and the potential inability to cope with run off from rainfall which would result in flooding and pollution into water courses including Shortbridge Stream.

4. The Wealden District Council 2019 SHELAA rejected any development on the land at Downlands Farm stating that it was an area of attractive and rural landscape on the fringes of Uckfield containing much ancient woodland which was not suitable for development. The Planning Inspector in 2009 also concluded that the site should never be built on. There has been no change to the area since then so those decisions remains valid.

5. The Council is also very concerned for the habitats, environment, ancient woodland and wildlife that currently occupies the unique Downlands Farm site and Lake Wood. The development would have a detrimental impact on the wildlife and biodiversity of the area and lead to degradation of species and habitat.

6. The Parish Council also supports, wholeheartedly, the objections raised by Uckfield Town Council in its comments on the application made at the Plans Committee on 26 September 2022.

Natural England

We have reviewed the application's proposal for Suitable Alternative Natural Greenspace (SANG) using our professional judgement and in line with our internal guidance which has been used to inform suitable SANGs elsewhere (including Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG) - August 2021). While there are some positive features of the SANG, including its overall size and diversity of habitats, there are some significant concerns that we advise need to be addressed and supported by evidence before the proposed SANG could be considered as acceptable mitigation for recreational pressure on Ashdown Forest Special Protection Area (in line with the established strategic solution), in relation to its function as a SANG and its potential negative impacts on valuable ecological features present on site:

Ancient woodland

• While it can *sometimes* be acceptable for Ancient Woodland to be used as part of a SANG (e.g. where this is sensitively managed and ecological surveys don't pose any particular concerns), this SANG does appear to rely on a significant amount of ancient woodland that surrounds much of the site with the circular footpath cutting through it at multiple points. This will need careful consideration to ensure that increased visitors will not adversely affect this irreplaceable habitat.
• The application evidence suggests that part of the circular route includes informal paths that are already used (Plan 5719/SMP3). However, it is unclear how extensively these are used and whether increased visitors would cause significant negative impacts on the site, so this needs to be investigated further.
• EDP Plan 6170 D016 Rev. D shows that the proposed circular route includes new pathways that would encourage visitors to venture further into the ancient woodland that have not been identified as current informal pathways in Plan 5719/SMP3

Nature Conservation Value
The survey evidence suggests that in addition to the ancient woodland, there are valuable habitats and species present on site including priority habitat and protected species. The following extract from our SANG guidance therefore applies here and should be followed:

"*The identification of SANG should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANG, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the development plan. These sites may require an ecological discount of their proposed SANG area*"

Therefore, we advise that there has not been a sufficiently detailed assessment of the impacts that the SANG designation could have on the ecological interests of the site, and further regard for this is needed before a decision regarding the suitability of the SANG can be made.

Circular route
It is difficult to assess the suitability of the circular route without visiting the site as it is important to gauge the feel of the site and natural routes that visitors are likely to be drawn to due to aspects such as topography. However, while the drawings suggest the length is acceptable, it does look contrived in some places which may not reflect real-life desire lines and visitor movement. For instance, where paths straddle the SANG boundary in the open-space areas to the South East within the SANG boundary, there is a risk that visitors will cut across the middle. This might be helped by introducing more focal points.

While unsurfaced footpaths are preferred for their semi-natural feel, consideration needs to be made to ensure that they are usable throughout the whole year, particularly through woodland areas as relying on management inspection may not always be sufficient depending on the seasonal changes in the level of water present throughout the site. This is particularly relevant for routes that cross or are near to water-courses/ponds, which may require boardwalks.

Community orchard
While the principle of connecting multiple green spaces together as part of a broader network is welcome, the inclusion of the orchard within the SANG proposals needs to ensure that it is designed in a way that complements the semi-natural features that promote a 'wild' feel required for delivering an effective SANG. For example through non-linear planting and by combining with interspersed wildflower meadows.

Other comments The application is proposing to discount capacity of 10% on the grounds of existing, informal public access but it is not clear what the justification is for this figure.

Given the above, further information and evidence is needed to determine whether these concerns can be addressed in line with our advice before we can support the

SANG proposal. Once this has been supplied and if it demonstrates that concerns most likely can be overcome, we would need to carry out a site visit to confirm if the SANG proposals are suitable. We appreciate that there have been several requests for us to carry out site visits under our non-statutory Discretionary Advice Service that we have been unfortunately unable to attend due to capacity issues.

We also note that there are significant concerns, including ecological and landscape impacts, that have been previously considered via Public Inquiry for applications at this site that led to their refusal. This includes the ancient woodland already referred to, woodland habitats (which contain ancient woodland indicators according to the applicant's ecological assessments), priority habitat, local landscape value, protected species, and connectivity as part of wider ecological networks which could make it well placed to consider as part of driving landscape-scale nature recovery. We also note that WDC's SHELLA previously identified this site as not being appropriate for development:

'This is an area of attractive rural landscape on the fringes of Uckfield, containing much ancient woodland. Development of the site would entail considerable adverse landscape impact and would compromise its nature conservation integrity and biodiversity interests. In addition, development of the site is unacceptable on transport sustainability grounds and because of its relative inaccessibility from the town centre. The site was also subject to an appeal which was dismissed by the Secretary of State in 2008 due to specific site constraints.'

It is appreciated that the application in question has been scaled down and changed compared to the one that was considered at Public Inquiry and should be assessed in its own right. Nevertheless, significant concerns still remain due to the site's current and potential landscape and ecological value, both in its own right and more widely as part of the surrounding area.

We advise that your Authority needs to carefully consider these features and their impacts from development in line with our standing advice, in place of bespoke comments from Natural England, to inform your decision making (see Annex 1).

Historic England

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at https://historicengland.org.uk/advice/find/
It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

WDC Biodiversity

Ancient Woodland, Irreplaceable Habitat

The large site is extensively bounded by and includes ancient woodland (AW), irreplaceable habitat. The site directly borders Lake Wood Local Wildlife Site on its southern side consisting of AW. The southeast of the site includes Fir Grove Copse AW, largely within the site boundary. The north-northwest of the site includes a thick corridor of woodland consisting of AW and priority habitat deciduous woodland. An AW ghyll, Longwood Ghyll, bisects the proposed developed area of the site within the south-centre to west area of the site. Shermanreed Wood AW bisects the site in the north-centre of the site alongside proposed developed area and proposed sustainable alternative natural greenspace (SANG). And the extensive Budlett's Wood is partially within and borders the site along its north to east boundary alongside proposed SANG. These poise significant and material constraints to development at this location. SUDS, Proposed Directional Drilling under and into Ancient Woodland, Irreplaceable Habitat and AW Buffer Zones.

The development proposes 13 SUDS ponds on the site. 9 of these are proposed within the minimum 15 metre buffer zone for ancient woodland, irreplaceable habitat. This includes SUDS pond on sheet 2 of the hard and soft landscape plan at 7 metres, SUDS on sheet 3 at 4 metres, SUDS on sheet 4 at 7 metres and SUDS on sheet 6 at 0 metres. It is clear SUDS at these locations will not be able to be accommodated without impacts upon AW. Natural England standing advice for AW states: "Buffer zone recommendations: For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone". And:

"A buffer zone should consist of semi-natural habitats such as: woodland; a mix of scrub, grassland, heathland and wetland". Failure of SUDS drainage and effectiveness to capture pollutants, contaminants and nutrients would lead to AW degradation and loss. Whiles SUDS can provide wetland habitat they do not provide sufficient buffer habitat for ancient woodland and waterbodies reflect light and noise, indirect impacts to AW; the majority of SUDS proposed are between road and AW where such impacts would be frequent onsite (e.g. vehicle movements).

At 11 locations the SUDS are proposed to have outflows directionally drilled underground through AW, emerging in AW by the ghyll streams. This will cause direct damage to AW and AW habitat/species where drilled pipes emerge through AW soils, levelling and citing proposed headwalls and ongoing impacts through proposed permanent citing of what is described as ground-bearing, prefabricated headwalls. Whilst bore-hole surveying has been undertaken on the site, for assessing soakaway capabilities of the site, this is at sporadic locations and it is understood such proposed directional drilling can be prevented by soil and rock composition on proposed routes, for example seams of sand causing drilling to change direction or be aborted; it is noted such geology is present very near and potentially on the site. There is also likelihood that one or more of the proposed directionally drillings will meet complication and not able to be completed or damage AW habitat, soils or tree roots in the process.

The geo-environmental site investigation report indicate soakage rates are too low to drain the site by infiltration, as such SUDS at these locations would be therefore

discharge through ancient woodland, causing direct erosion and damage, or leading to recommendations for drainage trenches or hard landscaping features to accommodate outflow within AW, causing direct impact and degradation.

The proposed development would significantly increase hard surfaces on the site leading to a likelihood of increased water flow of, potentially contaminated surface water run-off into AW. The SUDS outflows are proposed to be concentrated at 11 points within AW where changes in hydrology will likely occur with increased localised flow rates and increased localised erosion of AW habitat within AW ghylls. Currently the drainage conditions onsite consist of a large expanse of grassland, which provides soakaway outside of the AW and distribute residual amounts of water widely into the AW, maintaining slow water flow and negating erosion. It is reasoned the development would not mimic the existing hydrological regime as water outflows would be concentrated AW watercourses through drainage pipes; such piping of water may would also not act as current processes of slowing water flow down to prevent erosion and silt deposition within AW.

The proposed development includes and has a large interface with AW. Natural England Standing Advice states the proposal should have a buffer zone of at least 15 metres. The development proposes extensively the minimum 15 metre buffer zone (where detailed elsewhere in this consultation is compromised in a number of locations). With such a large interface with AW it would be expected that buffer zones would be greater to demonstrate no direct or indirect impacts, degradation or loss.

Ecological objection is raised.

Installation, Lighting and Access through Fir Tree Grove Ancient Woodland, Irreplaceable Habitat.

A boardwalk is proposed through Fir Tree Grove woodland, AW. There is no current access through the AW. This will cause direct and indirect impacts to the ancient woodland, AW loss and degradation. This does not meet the exceptional circumstances test of the NPPF 2021 s180c.

Impacts include: direct impact to AW through installation of circa 95 upright supports into AW soils; preventing and reducing light to the woodland floor, impacting ecology, eradicating existing species and preventing natural AW regeneration and growth; increase lighting levels (see below), and; increased noise and disturbance through increased access. The detailed soft landscape plan depicts 20 trees or groups of trees to be removed to accommodate the boardwalk in AW. In addition there is high likelihood that there will be future and immediate pressure to reduce or fell further AW trees in the vicinity of the new access proposed; increasing the risk of damage to people and property by falling branches or trees requiring tree management causing habitat deterioration.

Installation of 20 lighting units are proposed along the boardwalk length within Fir Tree Grove woodland, AW. The submitted lux lighting plan shows these will emit between 5 lux at these 20 locations. This is unacceptable and will materially impact ancient woodland ecology; lighting should be restricted to outside of AWs and AW

buffer zones. Development within ancient woodland should be avoided. The existing condition of AW is not a reason to give permission for development. A woodland or tree in poor condition can be improved with good management.

Ecological objection is raised.

Access to Ancient Woodland, Irreplaceable Habitat
There is no current public rights of way on the site. The application proposes circa 780 metres of footpath in AW. This will cause impacts upon the ancient woodland and an increase of damage to habitat including: trampling of plants and erosion of soil by people accessing AW; increasing disturbance to wildlife such as noise from additional people and traffic; increasing the amount of pollution including pet faeces and rubbish, and; increasing the risk of damage to people and property by falling branches or trees requiring tree management or removal causing habitat deterioration.

Along this route unsurfaced footpath is proposed with loose log edging lined with brash, approx. 0.5m high. This is an deemed ineffective to limit access to ancient woodland where no current access exists.

The proposed emergency access to the site from the A22 is through a narrow strip of woodland between two areas of AW. No buffer zone is proposed. It is unclear how access can be achieved for large vehicle visibility and turning without direct impacts and loss of AW.

Ecological objection is raised.

Biodiversity Net-Gain/Loss & SANGS
As per section 180 of the National Planning Policy Framework 2021 and policy WCS12 Biodiversity of the Wealden District Core Strategy Local Plan 2013, development should provide biodiversity net-gain that is integrated as part of their design. A biodiversity net-gain (BNG) assessment has been submitted with the application. This proposes a BNG of 42.33% for habitat units and estimated 86.41% for hedgerow units. The assessment states all created habitats will be made into ‘good condition’ significantly uplifting BNG calculations; this is deemed as unrealistic and unachievable. Post development, habitats would be subject to increased access, disturbance, noise, littering, fly-tipping & garden encroachment issues, roadside habitat parking, lighting and trampling & compaction and nutrient input through pet faeces and pet predation of wildlife. Habitats adjoining proposed/retained woodland and scrub such as proposed good condition wildflower grassland would also be subject to heavy shading, significant leaf litter and scrub encroachment. SUDS functions involve cumulative storage and capture of pollutants, contaminants and nutrients; it is unclear how good condition can be achieved and maintained. Ancient woodland and priority habitat deciduous woodland (as covered above) would be subject to increased direct and indirect impacts and achieving good condition is also deemed as unrealistic with these new and increased pressures.

The Natural England guidance for SANGS states:

“The identification of SANG should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANG, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the development plan”.

“It is recommended that the BNG calculations for the SANG are done separately from the rest of the project calculations, in order to ensure a clear audit trail and allow for simple demonstration of the additional biodiversity unit uplift beyond the minimum SANG requirements. Any additional features provided for BNG purposes should not conflict with the principle purpose of the SANG.

Consideration should be given for other ecosystem services provided by the SANG and design should ensure BNG does not compete with these but delivers alongside them. For example, a wildflower rich grassland area created for biodiversity benefits would provide additional ecosystem services but could potentially also conflict with recreational services provided by the SANG”.

And: “Careful consideration should be given to the design of any additional biodiversity features introduced into the SANG to ensure they did not conflict with the SANGs principle purpose. For the purposes of the BNG calculation, the baseline value of the SANG is the site with the Habitat Regulation key required habitat features incorporated. Enhancements should be additional to count towards BNG, in that the enhancements would not have taken place in the absence of the BNG funding (or commitment of funding) and the biodiversity benefit (as measured through themetric) should not also be claimed to compensate for another project’s biodiversity impact”.
Ecological objection is raised.

Recommendation
Ecological objection. It is recommended the development does not meet local and national policy and associated guidance.

National Planning Policy Framework 2021 sections 174, 157 179 180 & 185
Wealden District Core Strategy Local Plan 2013, policy WCS12 Biodiversity
Wealden District Local Plan 1998 saved policy EN13 Ancient Semi-Natural Woodlands
Natural England Guidelines for Creation of Suitable Alternative Natural Greenspace 2021
Natural England and Forestry Commission standing advice for ancient woodland and veteran

WDC Arbs and Landscape

Situation & location
The site is significantly constrained by ancient and semi natural woodland habitat (ASNW), areas of which project deeply into the centre of the site and influence the developable space. This habitat connects to a wider network of similar features.

Current planning policy guidance stipulates that: *180c - development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.*

Ancient Woodland (ASNW) and Veteran Tree (VT) Impact
The proposal would result in a sudden and abrupt change leading to an intensification of the use of the site. A previously undeveloped space would become an urban edge feature to the existing adjacent woodland and veteran trees making them far more vulnerable to direct and indirect impacts such as those described below:

- Higher levels of noise
- Light pollution
- Disturbance to wildlife
- Vehicle noise and pollution
- Increased human activity, including trampling, creation of desire lines, fly tipping, catpredation etc
- Veteran trees are sensitive to sudden environmental change and are particularly vulnerable

to the disturbance that inevitably results from a fundamental change of land use, such as construction.

- Changes to air quality can also adversely affect organisms that contribute to the irreplaceable nature of ancient woodlands and veteran trees (lichens, bryophytes, mycorrhizal networks etc).

Proposed buffer zones
In line with current standing advice the application proposes a 15m buffer around all ASNW and a x15 stem diameter buffer around veteran trees. Standing advice however notes that where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. The size and scale of the development and it's interface with the existing ASNW and VT constraints suggests that this is an appropriate case where site specific larger buffers should be considered. In the case of Thirty Acre Wood for instance, the development proposal would lead to the woodland being encased within an urban structure, the A22 to the west and the proposed built form to the north and south. Similarly, Longwood Gill would become surrounded by built form and new hard surfacing to the north, south west and east, and its current protective isolation would be lost.

SUDS
It is noted that in at least nine instances, proposed attenuation ponds encroach into the delineated 15m ASNW buffer zones. Current standing advice states that development proposals within a buffer zone should not be approved. The proposed installation of SUDS structures within ASNW buffer zones should not be encouraged as these bring with them access and maintenance requirements that would undermine the effectiveness of the buffer zone as an undisturbed protective space.

Drainage connections using trenchless methodology

The drainage strategy proposes below ground drilling through much of the existing surrounding ASNW to connect with ghyll streams located within the same parcels of ASNW. Proposed methodology includes *"locating drainage inflows at pre-existing inflow points, installation of piped connections using trenchless methodology, and use of ground-bearing, prefabricated headwalls to prevent loss of woodland*." I am sceptical that this engineered solution would be as straightforward and harm free as it is presented and I am unconvinced that there would be no impact, direct or indirect, to the ASNW habitat from such a technical undertaking. Access of machinery and materials alone would cause disturbance to the habitat during the construction and this has not been fully assessed. The starting point of the standing advice is avoidance of impact to ASNW and the proposal to actually employ the ASNW habitat to make the proposal acceptable seems to be contrary to this advice. The caveat of Para 181c of 'wholly exceptional circumstances' is not met in this case.

Boardwalk connection to Uckfield Town
The application proposes the installation of a raised boardwalk through the south east corner of the site to act as a pedestrian connection to local services. The installation of an unnatural manmade feature, which incorporates lighting units, directly into ASNW habitat again raises a concern as an unwelcome and unnecessary intrusion into the ASNW habitat. The connection also encourages an intensification of use and would involve the removal of a linear swathe of woodland trees in order to accommodate the structure. The tree removals are detailed on FLAC 40-1020-02 within the AIA and shows that a number of the trees are categorised as B quality under BS 5837:2012 standards, which would presume a remaining contribution of at least 20 years. However, using the BS 5837:2012 classification method for trees within woodland overlooks their habitat importance as dead/decaying wood and this appraisal format is generally more appropriate for amenity contexts rather than habitat assessment.

Objection
I am unable to support the application in its current form as the cumulative effects and impacts to the ASNW habitat, as outlined above, are considered to be contrary to NPPF (2021) para 180c and saved WDC Policy EN13.

ESCC Highways

Executive Summary

As submitted, the application for both the outline and full consent cannot be supported for reasons relating to:

1) All 3 accesses and accessibility measures for active travel cannot be accepted as being deliverable from both a design and highway safety perspective.
2) PRoW routes are inappropriate for everyday use as surfaces and gradients are unsuited to vulnerable users, prams/buggies, and require solid footwear.
3) The community transport option has received objection from the Passenger Transport Team, though there is a further option to explore and discuss.
4) Highway impact on the town centre roads has not been assessed

5) The scheme is detached from the urban fabric of the town, and this prevents any efficient connectivity to the local amenities

Response
This application seeks planning consent for an outline proposal for up to 424 dwellings to include details for access and accessibility (24.7ha); and a detailed proposal for a SANG with associated parking provision (18.1ha).

For the outline application, the submission seeks approval for 'access' only. The remainder of matters would be addressed at reserved matters stage (layout, appearance, landscaping and scale). Pre-application stage discussions with the Highway Authority involved agreement of the scope for the Transport Assessment and modelling provision required for this site with 3 other major Uckfield sites being considered ahead of Wealden Local Plan preparation.

The access matters relating to this application are:

- Policy and Planning History
- Site and location
- access/Accessibility for non-car users
- Impact of development traffic on the highway network
- Transport modelling
- Parking and servicing
- Travel Plan

1. Policy & Planning History

1.1 Core Strategy Local Plan adopted February 2013
This document is considered out of date (Wealden Local Plan -Direction of Travel Document). The allocation of 1000 dwellings within that have been met through planning consent at Ridgewood Farm. This site has not been allocated in this document or local plans preceding it. The emerging local plan is in its early stages and publishing of the Reg 18 consultation is imminent.

1.2 History

WD/2006/2855 – Residential development for 750 dwellings, 2000sqm B1/B8 uses, village centre, primary school, community hall, retail facilities. Refused 22/07/2007, dismissed at appeal 24/02/2009 including significant highway concerns relating to constrained accessibility by non-motorised users between the site and local amenities and consequential impact within the town centre.

2. Site and Location

This application site is currently agricultural/open land with direct access from Snatts Road, from a driveway serving the farmland, Swallow Barn, Partridge's Oast and Oast Cottage. In terms of location, the land subject of both elements of this hybrid application is between A22 Uckfield bypass to the northwest and Snatts Road to the southeast. The A22 is part of the major highway network and Snatts Road is an

unclassified road serving land uses including residential, a cemetery aside from the current use (agricultural and open space used for recreational leisure walking).
Snatts Road – An unclassified road, no data provided to indicate the flows or vehicle speeds. Speed limit is derestricted, and footways are absent, and verges are narrow and generally impassable until one reaches Downland Copse link when a footway is available on the south side approximately 1m wide up to London Road. The carriageway width is variable between 4.3m and 5.5m

A22 Uckfield Bypass is a strategic route linking to the A26 and A272 and providing connections to Lewes, Haywards Heath, Eastbourne and Crowborough. It currently carries an average of 23,830 vehicles on a daily basis (2019 Annual Average Daily Trips-AADT). Speeds are derestricted in the vicinity of the site. The character and design of the A22 is a motor vehicle dominated major route.

Uckfield is the closest commercial centre from the site and is approximately 1.8km from a central position of the site. It provides a good selection of local shops and amenities. However, to reach these by foot or cycle from the site is posed with challenges and constraints. Rocks Park School is the closest primary school approximately 1.8km walk and Uckfield College and leisure centre 2km away.

Uckfield Town centre is located to the southeast of the site and provides a choice of travel options by rail and/or bus.

3. Access - RESIDENTIAL

3.1 Vehicular access

Vehicular access is proposed at 2 points onto the A22 Uckfield Bypass. The main access into the site is a full roundabout and the secondary access is shown as an emergency/bus route. The position of the roundabout is approximately 1.2km north of Copwood Roundabout and 100m from the boundary with Lake Wood. The emergency access is approximately 500m south of Black Down Roundabout. The distance between the access points is also approximately 500m.

In principle, the access points appropriate for the A22, though several concerns are raised:

1) An emergency access onto the A22 is unlikely to be practical if for any reason there is a RTC on the A22 resulting in its closure. It would mean that the site would not be accessible as both access points would be closed to vehicle movement. Urgent journeys from the site by vehicle would be difficult in the event of an accident or persons needing medical attention for example.
2) The emergency access is only accessed by vehicles approaching from the north due to its position within a lay-by. For emergency vehicles needing to reach the site from the south, they would use the main access.
3) Its use as a bus access would require the bus to approach from the north via Budletts Roundabout, which would be a convoluted route for any bus service to serve the site, having to drive out of town to reach the site and to then route peripherally back into the town. The efficiency of a service that would have its main

journey on the Bypass is questioned. The County Passenger Transport Team have provided comments on this aspect.
4) The main access additionally provides cycle and pedestrian access. The proposed roundabout is shown to DMRB standards.
5) The accesses have been subject of a RSA1 and a designer's response has been provided. The County Traffic and Safety Team have provided comments on this aspect

3.2 Active user Accessibility

Pedestrian access provision for the site comprises of several existing and proposed links. A Non-motorised user audit was requested at pre-application stage to evaluate the existing conditions to identify strengths, weaknesses and opportunities in the areas surrounding the site. The applicant considers that a 2km distance is acceptable to reach local amenities, equivalent of 25-minute walk. From identifying the routes to the town centre for employment and transport connections and educational establishments nearby (destinations likely to be required on a daily basis), although these would appear to have proximity to the site on plan, on the ground some of the routes are considered to be inconveniently long, constrained, or difficult in terms of gradient and surface.

• Between the town centre and the site, the pedestrian routes identified in the NMU audit are:

W1a – using Snatts Road to connect to an adopted path and then PRoW, one encounters a steeply stepped section and narrow unsurfaced and unlit alleyways until reaching Pudding Cake Lane, onto Church Lane and up to the junction with High Street. The route is underestimated by the applicant as 1.3km, and has been measured as 1.6km. The closest bus stop when using this route is 1.25km (The Drive). The route is unlikely to be regularly used after dark and has an incline which would not be appropriate for less mobile users. The alleys are narrow and are not overlooked and do not consistent alignment or forward visibility to feel secure. During wet weather the surface is unlikely to be usable. Pudding Cake Lane is a shared surface with vehicles which is narrow and may be difficult when using the lane whilst a vehicle is manoeuvring within it. Church Street has narrow footways with a section that has an elevated section and incline. This route is not suited to less mobile, people wishing to walk side by side (adults with young children), security conscious, bad weather conditions.

W1b uses the initial section of W1a and diverts to Hunters Way and still encounters steps to the south of Downland Copse. From Hunters Way, one can walk along good quality adopted footways that are lit up to the junction with The Drive/Rocks Road, where after the footways narrow as stated earlier that have little scope for improvement between The Drive and High Street. The narrow footways pose issues when there is an increase in pedestrian activity and there are pedestrians walking in opposing directions, wishing to pass one another. This may cause stepping out into the carriageway, increasing risk of collision or tripping. This route has been measured as 1.8km from the centre of the site.
W1c the initial section of this route is proposed form the site through a dwelling known as Chicory Cottage acquired by the applicant. This crosses the Snatts Road

junction with Rocks Road and connects to the existing footway network which then becomes Church Street with the constraints highlighted in earlier routes. This route is measured as 1.35km.

W1d – along the A22 and Bellfarm Road, which has lighting but vehicle dominated with a route measured in excess of 2.7km. This requires a footway/cycleway installation as there is not current provision. This route is not convivial and is a long one-way route and so the prospect of a return journey would be unattractive, particularly on foot.

W1e – is a route that starts as W1c and routes through Rocks Park Road towards Bellfarm Road through estate roads until reaching a short section of adopted footpath between 12a and 14 Scarlett Way and Bellfarm Road. Between the site and junction with Rocks Park Road, Rocks Road is partly derestricted and the footway has seen vegetation overgrown into it making it narrow, and potentially having a narrowing effect adjacent for pedestrians walking adjacent to vehicles travelling at speed. The entire route is adopted and lit. This is the best route towards the town centre in terms of quality subject to improvements to the network between the site and Rocks Park Road, but is lengthy and indirect.

Routes to the High Street are acceptable only through the modern housing estates where there are good quality footways that are lit and have good surveillance. Church Street is part of the historic part of the town centre that is not built to modern standards and has limited scope for improvement.

• Between the railway station and the site, the pedestrian routes identified in the NMU audit are:

The routes highlighted by the applicant are extensions of the above routes which are through High Street and Bell Farm Road which are appropriately designed to accommodate pedestrians. However, the distances to the railway station are in excess of 2km, given that the distance from Church Street junction to the station is ~0.5km. This exceeds the generally accepted walking distance of 2km as set out in guidance document IHT Providing for Journeys on Foot.
• Between the Bellbrook Industrial Estate and Meads Med
ical Centre and the site, the pedestrian routes identified in the NMU audit are:

The routes highlighted include A22 route form the main site access and route through the Rocks Park estate. These routes are 2km distant. For trips to the medical centre (patients), when poorly one is not likely to be walking or cycling and these are likely to be car borne trips as buses do not reach this part of the town. Journeys to the industrial estate are likely to be employment related and as referred earlier, this route is not convivial and would exceed 2km.

• Between Uckfield College/Leisure Centre and the site, the pedestrian routes identified in the NMU audit are:

W4a – the route is indirect and measures slightly in excess of 2km. There is absence of a crossing point on London Road to connect to the south side of the High Street. The route is walkable and generally of good walking surface with lighting and

surveillance but has a minimum distance of 2km which is the preferred maximum. For the secondary school, a route requires a safe crossing point on London Road.
W4b – This route is equally indirect and also is 2km+ with a combination of unlit sections of alleyway and steep steps. Again London Road has absence of a crossing
W4c – 2.25km distance on more of a formal route with lighting but has gradients which may be challenging for some.

W4d – approximately 1.9km using Church Street and Rocks Road, with constraints as described earlier.

Summary of pedestrian routes are that all local amenities are ~2km away and routes are not entirely suitable for all users, or direct. To walk into town from the site is around 30 minutes each way which would not be a method of travel agreeable for most residents on a daily basis. Furthermore, journeys on foot for primary aged children or families are posed with challenges such as distances, gradients, and narrow footways.

Cycle Routes Audit

Route C1a: Snatts Road/The Drive/Church Street – it is questioned why the route does not use Snatts Road south section which would be a much shorter route to reach Church Street than via The Drive. It is noted that Snatts Road has derestricted speeds, and the applicant has not provided a speed survey to demonstrate acceptability of it use as either a pedestrian route or cycle route. Noted that the route is downhill towards town and would be uphill on the return journey which may not be as attractive.

Route C1b: Rocks Road/Church Street – this route from the site uses the section of the site currently Chicory Cottage where a designed cycle ramped route is proposed. This leads to Rocks Road which is derestricted where it joins at the junction with Snatts Road. En-route towards the town centre, just north of Hunters Way, the speed limit becomes 30 mph, though speed surveys do not demonstrate that actual speeds are contained to justify its suitability for cycle users. Church Street has a 20mph limit just south of The Drive towards the town centre. Church Street is narrow and when both lanes are occupied, there is no overtaking provision. The section of Rocks Road is also narrow, unlit and with derestricted speeds.

Route C1c: A22/Bellfarm Road – this is a longer route, with suitable gradient, but shared with general traffic. The A22 is designed for motorised traffic travelling at speed and so the A22 is not suitable for cyclists. The applicant is proposing measures to accommodate cyclists, discussed later in this report.

Route C1d: Rocks Road/Rocks Park Road towards Bellfarm Road and High Street – this is the same route as C1b, with a restricted section between Scarletts Close and Bellfarm Rd.

Routes to the railway station, medical centre (Meads) and Bellbrook are the same routes as for pedestrians. Dismounting is necessary in alleys, and a cycle route is available to travel west along Bellfarm Rd.

Routes to the College and Leisure centre are along the same routes as shown for pedestrians.

The routes are similar as for pedestrians, but cycling cannot replace walking journeys for reasons relating to ability, confidence or when adults are accompanying small children. All the routes have inclines and indirectness which may not encourage cycling though from routes listed, sections of them are suitable. When considering the entire routes, they may well be appropriate for active single user journeys but limited to those more confident as there are no traffic free routes.

The scoring system used to assess the routes is flawed as there is inclusion within the methodology to score the internal route (yet unsubstantiated as the internal layout is not part of the outline application) which brings the average score up. The assessment should be how the site can be connected externally.

The walking audit scores are therefore lower than stated and distances that are in fact marginally longer. The ~2km routes which would on average take 25-30mins (4-5kph average walking speed), are likely to take longer due to inclines, and crossing roads.

The applicant has identified the weaknesses in both the pedestrian and cycle routes and offered mitigation measures.

o Provision of new pedestrian and/or cycle infrastructure to connect the site to existing networks (e.g. along Rocks Road, Snatts Road and the proposed vehicular access off the A22) where there is no existing provision; Comments: this proposal was put forward for the previous proposal which was dismissed at appeal. The Inspector considered this route lengthy, indirect and unattractive. This factor remains that for a route that would link to the town and nowhere else, it transits around the town to reach it, alongside potentially heavy and fast-moving traffic levels including HGVs and noise. The highway works on Bellfarm Road have not been taken into account the accessibility improvements secured as part of Gridserve development on the west side of the Copwood Roundabout. o Installation of appropriate crossing facilities for pedestrians and/or cyclists on Rocks Road (to aid connections to the town, railway station, and industrial estate), Snatts Road (to link to existing footways/paths), London Road (to assist movements towards Uckfield college and leisure centre) and Bellfarm Road (to enhance provision to the industrial estate). Comments: it is noted that there is a proposed speed limit change to extend the 30mph at the point of a proposed crossing point. No speed survey data to justify the change in speed limit nor proposals to alter the visual appearance and character of this section of Rocks Rd other than widening of the footway and new footway close to the junction of Snatts Road.

o Replacement of existing steps at the end of Downland Copse (along footpath 3a) and surfacing of public footpath between steps and Hunters Way; Comments: The Rights of Way Team have provided comments which are against the removal of the steps. These comments are provided later in this report. o Widening existing pedestrian/cycle routes where currently not suitable for intended user groups (e.g. along sections of Rocks Road, Church Street, and the existing foot/cycle path along Bellfarm Road); Comments: ESCC Traffic and Safety Team have provided comments which are provided later in this report o Installing measures to reduce vehicle speeds on the approach to the town and enhance pedestrian

and cycle priority at junctions; Comments: ESCC Traffic and Safety Team have provided comments which are provided later in this report o Installation of suitable signage along existing public footpaths to core destinations; Comments: details of signage has not been provided o Ensuring appropriate lighting of any new connections/routes. Comments: Suitability of lighting for highway safety and security within the greener areas of the site are dependent on ecology comments, which may define whether some routes are in fact reliable active links to the site. comments here to the unadopted sections of footpath proposed for improvement, i.e. the section marked A-B-C-D-E on the attached plan between Downlands Copse and the footpath connecting to The Mount. **A-B (steps)** I have significant concerns about the proposal to remove the existing steps. From the photographs, these are sandstone steps, partially hewn in to the outcrop of sandstone bedrock. Aside from the practical challenge of significantly remodelling the steps, I imagine their removal would meet with strong opposition locally and from the Town Council. I also assume that the Planning Conservation Officer and High Weald AONB Unit would oppose any fundamental interference with to the sandstone outcrop. There might also be ecology considerations. Therefore it is impractical or desirable to remove the existing steps and I think the most that can be done to improve them is to re-dress them with stone or concrete slabs of suitable character. **B-C (woodland path)** I am not convinced that the steps need to be extended. The wooded path is a continuous slope, and I don't think extending the steps will make any significant improvement. A path of rural construction with compacted stone and timber edges is proposed. I do not think that will be a suitable construction unfortunately, because of the steep incline. We would also not want timber edges, as these would have a relatively short lifespan and limit the lifespan of the path. The gradient will require a bound path of some kind. It is very clear from the large water catchment at the bottom of this section of path where it meets the rear of the properties on Hunters Way (point C) that the path carries a lot of water. An unbound surface would inevitable scour quickly and material would be washed in to the water catchment, causing potential blockages and an ongoing maintenance issue. So, an alternative surface will need to be considered. A tarmac path would be not greatly in keeping with the character of the wood. An alternative option may be a stone surface comprising cement, e.g. this product Hydraulically Bound Materials (HBM) | Roadways (road-ways.co.uk). **C-D-E (footpath at rear of Hunters Way)** There is clearly an error on the proposal plan where it labels this section as 'Existing asphalt footpath: Inspect surface condition and repair defects or resurface as required'. This is a narrow section of unsurfaced footpath running between the rear gardens of the properties on Hunters Way and The Mount. A tarmac surface for this section is likely to be problematic, due both to the width and likely root heave from the row of trees along the boundary of the properties on The Mount. I would suggest that this section could also be improved with a semi bound surface, if that is the choice for the woodland path (B-C). Although this section is considerably less steep, a rural surface of compacted stone may be sufficient. However, again, we would not want timber edging. For a short section at point D edging may be unavoidable, where the path has a severe camber and is badly affected by tree roots. **E onwards (adopted but partially unmade footpath connecting Hunters Way to The Drive)** From point E the path is technically adopted, but only has a partially made stone surface of around half a metre width to where it joins a tarmac path at the junction with the footpath leading to The Mount. The improvements to this section and the continuation will need to be considered by and agreed with Transport Development Control. A Safety Audit (stage 1) has been commissioned for the off-site highway works and comments from the Traffic and Safety Team have been provided in response to the proposals: Site access road

(north of Bellfarm) 2001061-101A • Drawing indicates a 4-metre wide central island at hop over. There does not appear to be the available road width to accommodate. Is there a technical plan as the 4m wide lanes, and 3m shared footway/cycleway do not appear to scale. • Reducing street lighting on south eastern arm of roundabout (approach from site to A22) is not acceptable, ensure feature is adequately lit in line with standards • No forward visibility splay provided for access road to roundabout. This may be detrimentally impacted by tree planting at the verge and centre islands at the dormouse hop over. • Proximity of hop over to roundabout is not provided or extent of planting. • Unlit feature in centre of carriageway liable to be struck/ issues with disorientated drivers exiting lit roundabout into darkness at a point where an unlit obstruction (island) is present in the road. Flush or reduced height kerbs may lead to vehicles mounting the island/ potentially striking the trees proposed. • Proximity of the new access/ roundabout to the northbound layby. There is a safety concern with drivers exiting the roundabout accelerating at a point when drivers in front are quickly decelerating to enter the layby. A left signal may be interpreted as an uncancelled exit signal from the roundabout. • Very short merge on the exit arms/ high speed road. Potential for side swipes. • Is there a case for preventing right turns into the north and southbound laybys (with the provision of the additional roundabout) • The northbound layby should ideally be upgraded to modern standard.

Emergency Access Road 2001061-102B

• Risk of shunts vehicles following emergency vehicles may not be expectant of the vehicle ahead of them to turn upon entering the layby. There will be no way to signal this manoeuvre.
• The radius of the access will require a low-speed entry which may not be appropriate for high speeds of emergency vehicles
• It is questioned if there is sufficient length ahead of the barrier for a vehicle to wait.
• Are visibility splays exiting reliant on maintenance of vegetation?
• Signing would need to indicate westbound only on exit.
• Layby should be upgraded to modern standard

A22/Bellfarm Road shared route 2001061-111 to 116 A22

• (As highlighted in the RSA) the horizontal separation between the carriageway and the shared route reduces to 1.5m in places. For a 60mph speed limit, the desirable minimum is 2.5m and absolute minimum is 2m (LTN 1/20). Additional protection is recommended at these points.
• Rocks Road overbridge narrowing (from 3 to 2 metres) over a longer distance than is recommended.
• Various traffic signs located within the highway verge where shared route is proposed, will need to be re-sited/ raised ensuring they remain within the optimum sight range for drivers.
• Bellfarm Road shared route proposals - how do they tie in with the proposals for Gridserve electric charging facility at Copwood Roundabout (see WD/20/1244).
• No provision for westbound cyclists (coming from the High Street) to join the shared route
• Proposed block paved pedestrian crossing infers priority over vehicles and may lead to careless crossing movements. While the new guidance in the highway code says that vehicles should give way to pedestrians waiting to cross at a side road and that pedestrians (that have started crossing) at side roads have priority, pedestrians should still exercise due care and attention.
• Existing proposals for the bus station – A technical design is still being prepared by the County Council as element of the town centre scheme. It is considered that the proposals offered by the applicant could be considered further once a final design is available, so that an appropriate tie-in can be considered.
• Raised crossing east of the roundabout (at bus station) will need to be adequately lit and appropriate warning provided. This would need to tie-in with the bus station proposals.
• Splitter island north of roundabout will need to be wide enough to accommodate waiting cycles (2m)
• Look at appropriate treatment on all arms of the roundabout (2 arms facilitate pedestrian crossing movements/ 2 do not).
• Footway widening on north-eastern corner of roundabout- ensure that larger vehicles turning north to east can make the turn without encroaching on the widened footway
• Cyclists guided to re-join the carriageway just prior to Bellfarm Lane- issues with conflict in markings (controlled area). Re-joining at conflict point. Look to extend facility east.

Church Street 2001061-134

• Regency Close reduction in junction radii - ensure adequate forward visibility south eastbound (bend in road opposite Belmont Road not obvious on plan). Rear access to stores/ waste collection points are located within Regency Close; vehicle tracking required to ensure larger vehicles can still access/exit safely.
• Priority working at Pudding Cake Lane forward visibility restricted by bend - drivers would be unable to make an informed judgement before negotiating narrowing.
• Approx. 1m wide footway at Pudding Cake Lane- where would a priority working sign be placed without causing an obstruction to pedestrians?
• Narrowing southeast of Pudding Cake Lane places vehicles on the wrong side of the road just before a junction (Belmont Road). A south eastbound driver's visibility into Belmont Road of any approaching traffic is restricted by the church wall.
• The narrowing on both sides currently signed extends between The Drive and Belmont Road making it difficult to provide warning of the build out in the south eastbound carriageway between Pudding Cake Lane and Belmont Road.
• Is the road north west of Pudding Cake Lane wide enough to accommodate queuing vehicles and passing traffic?

Rocks Road 2001061-132
• Widened footway on south side of Rocks Road (northwest of Rocks Park Road) appears to be into the carriageway reducing the effective width of the carriageway. Presently the width (roughly just over 6 metres) allows for centre lines and edge of carriageway markings through this tree covered winding road. If the width is reduced the current road marking arrangement will not be possible.
• There does not appear to be drainage provision upstream of the crossing point northwest of Hunters Way. There does appear to be evidence of ponding (on account of the detritus/ mud collected at the crossing point)- possibility of slips/ falls in wet or icy conditions. Review provision.
• The waiting area on the northeast side of Rocks Road (northwest of Hunters Lane) is not accessible for pedestrians, due to lack of maintenance (see photo). Also, a defect in the road in the pedestrian line, which may lead to a fall.

In addition, the proposed pedestrian/cycle access at the corner of the junction Snatts Road/Rocks Road requires a prominent appearance so that drivers are aware from all approaches of its presence. It is largely wooded and may not be obvious to drivers to expect non-motorised activity given its current rural surroundings. The approach from Rocks Road is likely to require traffic calming to ensure that drivers are travelling at appropriate speeds and awareness of approaching built form. It is likely that a more urban appearance would require continuity from a point west of the active access point, to highlight the environment change to the current defined built up area. The distance over where the 30mph is proposed is largely rural with vegetation dominating the route up to the junction with Hunters Way. It is likely that an engineered solution will be required, given that there is little in the way of frontage development over the ~200m distance.

SUMMARY OF ACCESS/ACCESSIBILITY
There are identified problems associated with the design of the proposed access points and the mitigation measures on the accessible routes which are likely to affect their deliverability and overall effectiveness in serving the site safely and conveniently. It is acknowledged that the rural nature of the site and immediate surroundings, in particular the strong ecological and woodland features, would likely

present conflict in providing the necessary highway and accessibility requirements for this site.

4 Impact of development traffic on the highway network

4.1 Traffic

The proposal is expected to generate vehicular trips on the highway network and the applicant has set these out within the TA. The daily trip rate of 4.376 per dwelling has been presented which is based on samples of sites, 11 in total in edge of town locations for privately owned dwellings. I have reviewed each of the sample sites and these are accepted as a trip rate for this site.

The estimated traffic generation is 1855 trips per day, including 225 in each peak period [0800-0900;1700-1800hrs]. All vehicle trips would be accessing to/from the site via the A22 proposed roundabout. The trips rate indicated is vehicular only and multi modal trips have not been indicated.

Journey to work data form the 2011 census provides information regarding the methods of travel for defined areas. For the Ringles Cross area, the dominant method of travel to work as a main mode is by private car 77%, 10% on foot, 3% bus, 6% train, 1% powered 2 wheeled vehicles, 2% cycle, 1% taxi, 3% passenger in car/van.

6 junctions have been tested for the proposal, using base flows from 2018 forming the Saturn model developed for testing development scenarios in Uckfield for 4 major sites (Horstedpond Farm, Bird In Eye North and South, Downland Farm). These are:

1) Site access roundabout junction with the A22;
2) A22 roundabout junction with Bell Farm Road (Copwood roundabout);
3) A22 roundabout junction with A26 (Black Down roundabout);
4) A26 roundabout junction with A272 (Budletts roundabout);
5) A22 roundabout junction with A272 (Batts Bridge roundabout);
6) A22 roundabout junction with A26 (Little Horsted roundabout); and
7) A22 Ridgewood Farm access

The impact from the development, using ARCADY software, considers the ratio of flow to capacity during the busiest periods (peak hours 0800-0900 and 1700-1800hrs) .

1) **Site access roundabout junction with the A22** – operates within theoretical capacity with A22 north arm reaching close to practical capacity (0.82) in the PM when forecast to 2039.

2) **A22 roundabout junction with Bell Farm Road (Copwood roundabout)** – this is proposed to have 4 arms, with the GRIDSERVE committed development which has commenced on site. The testing only considers 3 arms which happen to operate within capacity in 2039 with the development. As the GRIDSERVE development has not been included, this is an incomplete test. This roundabout is expected to have capacity improvement works as part of the secured package of works for Ridgewood Farm committed development. It is not clear if these improvements have been included in the modelling.

3) **A22 roundabout junction with A26 (Black Down roundabout)** – this junction has capacity constraints on A26 arm and A22 west arm in AM; and A22 west arm in the PM without the development in 2039. When adding the development traffic,

although there is very little difference in term of the queue lengths on all arms, the analysis indicates that this junction has capacity problem on the A22 west looking forward to 2039 with and without the development. 4) **A26 roundabout junction with A272 (Budletts roundabout)** – without development the London road west (Maresfield) arm is expected to reach above practical capacity with queues of 10 PCUs in 2039 in the PM peak. With the development the same arm sees the queues increase to 14 PCUs. This arm would reach close to theoretical capacity. 5) **A22 roundabout junction with A272 (Batts Bridge roundabout) –** in both scenarios with and without development 2039, this roundabout operates without any capacity stress. 6) **A22 roundabout junction with A26 (Little Horsted roundabout) –** in both scenarios with and without development 2039, this roundabout operates without any capacity stress. This roundabout is expected to have capacity improvement works as part of the secured package of works for Ridgewood Farm committed development. It is not clear if these improvements have been included in the modelling. 7) **A22 Ridgewood Farm Access -** in both scenarios with and without development 2039, this roundabout operates without any capacity stress. Town centre modelling has not been carried out to understand the High Street operation with and without the development proposal. In particular, the routes to the town centre to include the Bell Lane roundabout and signalised junctions Bell Lane/High Street and Church Street/High Street currently experience high volumes of traffic resulting in significant queuing and delays. In terms of scope to improve flows in town centre roads, there is little scope to do this and as such it is critical that development sites have ease of accessibility by other modes than the private car. Strategic modelling has been initiated using SATURN software to account for other major sites that had been promoted last year, of which 2 of these have now been submitted as planning applications, yet undetermined. Although the modelling work has to an extent been carried out, the modelling has not been validated, nor have any mitigation solutions been presented to address capacity issues that would arise as a result. Wealden District Council are due to release their Regulation 18 document for the first stage publication of the Local Plan consultation process. It is anticipated that the release of identified sites will firm the strategic modelling for Uckfield and highlight areas requiring mitigation and junction improvements to accommodate anticipated future growth. At this stage, as the strategic modelling is incomplete, this application is effectively premature to the current position of the local plan. However, from the initial data that has been released to the major sites' proponents, the application site has been modelled, though it is understood that there have been problems identified within it and so requiring further review. Comments of the proposed mitigation for the strategic modelling using all 4 of the major sites has highlighted 2 roundabouts that will require mitigation – Blackdown and Budletts. Blackdown roundabout has a known highway safety record which required the hatched lane on the north arm due to a camber posing hazards to HGVs. It is noted that the mitigation proposed by the applicant removes this hatching to open up two approach lanes to improve capacity. This is not accepted as a viable mitigation measure. At this stage, the modelling work to date accounting for this site only and committed up to 2039 does not consider the level of traffic that would enter the highway network within the town centre that is already at capacity. As these roads (High Street, Bell Lane, Newtown) already see significant delays, it is most likely that site related traffic will add more activity onto these routes, further exacerbating delays on the network. Multi user trips have not been provided, nor are

any demand flow diagrams to demonstrate the impact of the proposal (housing element) and how it affects the town centre.

SUMMARY OF TRAFFIC IMPACT Without a doubt there would be traffic demands associated with this site which would be required to access the town and town centre along roads currently experiencing long queues and congestion. The sustainable mitigation measures (for active travel) have been identified with highway safety problems and the deliverability of these are not certain, which puts further pressure onto the road network for journeys to and from Uckfield town centre. Furthermore, the A22 roundabouts mitigation identified have constraints. In light of the modelling to date, this has not been completed to a stage that has been finalised/validated, nor have mitigation schemes to overcome the future local plan sites impact been considered in full. **5 Parking and servicing** As the outline element of the application seeks consent for access only, parking and servicing for the housing element of the application is not necessary but would be part of a future reserved matters application, should outline consent succeed. Swept path plans have been shown for the access which shows a 16.5m long articulated vehicle traversing the proposed roundabout. Car and cycle parking is required to meet the County parking standards as set out in the car parking demand calculator and cycle parking standards. **6 Travel Plan** A framework travel plan has been provided as required by NPPF and County Council policy guidance. **6.1 Public transport – Buses** The closest bus stops are at The Drive for services 248 and 249. These are community services running only on Mondays, Wednesdays and Fridays and do not cover standard commuting times. The more regular services 29, 31/31A are more frequent and cover commuting periods but are available further away, close to the junction Snatts Road/London Road. It is understood that as a result of distant existing bus stop provision and access to them having constraints, that the applicant has proposed a site-specific bus solution. Comments from the County Passenger Transport Team are as follows: ***General Points****• There is a significant concern that the site would generate a very high proportion of car based journeys. Car drivers will have easy access to the A22. • The site location is very poor in terms of sustainable public transport access, with no service provision in the area. Pedestrian connectivity appears to be proposed in an easterly direction to Uckfield High Street, a distance of some 900 metres to the site boundary and in excess of 1300 metres to the north west part of the site. The pedestrian route that appears to be proposed, using sections of Right of Way south of Snatts Road, also has sections with steps. Not only do these walking routes need to accessible and safe (including for the needs of school pupils – see below) they should be attractive so to encourage active travel. • In the absence of a bus gate being provided off Snatts Road and/or Rocks Road, the only bus access between Uckfield town centre and the development would be via the Uckfield A22 bypass and Bellfarm Road. This would require the establishment of a new bus route. • The consultant's suggestion that as much as one third of peak time journey movements and one quarter at other times, between the development and Uckfield town centre will be transferred to the community bus service, is not credible.* ***School Transport*** *• It should be noted that school pupils would be unlikely to be entitled to free school transport, the pre-requisite being the nearest available school for pupils under 11s is 2 miles and the nearest school for pupils over 11s is 3 miles. This assumes the off-site works proposed are put in place to ensure safe pedestrian routes between the site and the schools, noting in particular the current unsuitability of Rocks Road as a walking route. • With up to 424 homes there will be significant*

home to transport travel movements which, unless the pedestrian/cycling routes are extremely attractive, will need to be provided for by public transport to avoid high car trip generation. This bus travel demand would completely overwhelm the school transport solution envisaged by the consultant, with a route intended to serve two primary schools and the secondary school, which relies on the use of two community bus vehicles with only 16 seats each. A further obstacle is that the morning start times of the three schools all fall within the time range of 08:45 to 0900, and the afternoon finishing times between 15:05 and 15:35. This means that there is little or no scope to alleviate peak loadings by 'double running' the minibuses as, particularly in the morning peak, all pupils would have travel at the same period to arrive at school on time. In any event, this would leave no space on the minibuses for other peak time service users. • It should be noted that access to Holy Cross School is particularly difficult to access by vehicle, the proposal for the community minibus to set down and pick up in the nearby Wealden District Council car park would be subject to the agreement of the District Council and dedicated safe dropping off/picking up space being provided. 1) The consultant should be asked to estimate the number of school pupils from the new development, split by school. In addition, they should demonstrate the modal split of journeys, including the numbers to be catered for on each minibus journey. The consultant should also be asked to confirm the number of journeys by bus users, excluding school pupils, in the morning peak period, afternoon peak period and inter-peak. • Subject to the consultant's response to (1), it is unlikely that the size of vehicles proposed, nor the frequency, will be able to meet the likely level of school bus transport demand. Providing larger capacity buses would incur significant expense. The cost of providing a full size bus, for a stand-alone Uckfield College school journey both morning and afternoon (noting that a full size bus would struggle, is currently in the region of £49,400. This would be for a bus with approximately 38 seats, and room for approximately 22 standing passengers. Assuming 50 pupils paying £2 each for a return trip per day (children are charged half fare) this would generate fares income of only £19,000 per annum, leaving a shortfall of £30,400 per annum. • Providing a larger bus (or buses) to cater for demand for school travel would also require the route, turning arrangements and bus stops within the new development that is suitable for such vehicles (see below). • Likely Outcome – It will not be feasible to provide additional transport provision to meet the needs of all school pupils. This though would result in a very serious operational risk that any bus route serving the development, provided for other purposes such as access to employment, would be swamped by school pupils. Only providing partially for school transport demand, ie. risking leaving some pupils unable to board the service, would be untenable. 2) The school access issues might be significantly reduced if a new primary school provision was part of the development proposal. Has the view of our Childrens Services Department been sought, or are they content with existing primary school provision in the area and access to them? ***Public Transport Provision*** *• Foremost, the County Council would expect an outcomes based solution which maximises sustainable travel modes, including bus use, over car use. There is a need to integrate service provision with the wider public transport network, which is an expectation in the Government's National Bus Strategy. This is important for onwards bus journeys, including to Eastbourne, Brighton, Lewes, Haywards Heath and Tunbridge Wells, in terms of information provision, timetable coordination and ticketing. • The East Sussex Bus Service Improvement Plan (BSIP) was submitted to Government in October 2021 as part of the National Bus Strategy process. Bus Service Improvement Plan for East*

Sussex County Council | East Sussex County Council . Jointly developed by East Sussex County Council and the bus operators in East Sussex, the BSIP proposes that bus services in the Uckfield are provided by way of Digital Demand Responsive Transport (DDRT), using minibuses. This is not specified in detail, but could range from a semi-flexible bus service (with only some route sections timetabled) to a fully flexible service (where all journeys would only run if pre-booked by passengers). Bookings would be made either on-line through an app or by telephone. This approach would not preclude the provision of wholly timetabled journeys, say at busier times of the day. Importantly, the service provision would also be available evenings and weekends. The DDRT service would be integrated with other longer distance bus routes serving Uckfield, as well as the Uckfield rail service, in line with the principles of the National Bus Strategy. The DDRT service would be dependent upon third party funding from development contributions though, subject to passenger use, we would expect over time the service to be nearing commercial viability. • Additionally, with other new developments in the Uckfield area (eg. Horstedpond Farm and Bird in Eye North and South), there is the need for a common approach to establishing new bus service provision by making the most effective use of vehicle resources and bus routing. Such an approach is vital to maximise the prospect of longer term bus service viability and to ensure public transport connectivity. • The above does not preclude the potential for developing and improving existing 'fixed route' bus services. In this context a potential solution, or possibly in tandem with DDRT, would be to revise current bus service 31. This runs between Uckfield bus station, Maresfield, Ashdown Business Park and Haywards Heath, and could instead run via Downlands Farm and Bellfarm Road instead of via Ringles Cross. Its current frequency is hourly, Monday to Saturday only, so this would need to be augmented. ***Consultant's Proposal for a Community Bus Service*** *• The consultant has put forward community bus based solution. There are significant concerns in relation to their proposal, not least that it appears not to take into consideration many of the requirements identified above. If a community bus based solution were established, it would need to be available to the public under a Section 22 Permit arrangement, not Section 19. The operational costings provided appear to underestimate the funding required. • The proposal's quoted contract hire estimate of £5,000 per annum per vehicle, plus £5,000 per vehicle for insurance, does not appear to sufficiently allow for contract hire and maintenance costs. There would also need to be robust spare vehicle back-up arrangements in place to cover for breakdowns and accident repairs. ESCC's experience is the cost of a 5 year contract hire of a coach built fully accessible 15 seat community minibus with tail lift, 10 week safety inspections, all maintenance, MOT, insurance will be around £18,000 per annum, so £36,000 for 2 vehicles.*

• Overheads relating to secure parking of vehicles when not in service, including overnight, have not been included. Note that there would not be space at Uckfield bus station for such parking.

• The consultant envisages that an agreement will be reach 'to use a local private hire firm' to provide qualified paid drivers for the service. ESCC has concerns that such an arrangement is not compatible with the terms Community Bus Permits. Whilst the use of paid drivers is not precluded in terms of Community Bus operation, specialised legal advice would need to be obtained to ensure that a commercial agreement to use paid drivers from a separate local private hire firm allowable.

• The management and governance of a Community Bus operation should not be under-estimated, particularly for a new start-up arrangement. If the service provision was to be provided by way of Community Bus arrangement, then existing community transport operators are likely to be interested in taking this on. Community Transport for the Lewes Area already operate services in the Uckfield area, including Section 22 public routes 248 and 249 under contract to ESCC. East Surrey Rural Community Transport Partnership may also be interested, as they have a base in Uckfield running 4 school services under contract to ESCC.

• The consultant has budgeted £30,000 per annum for 'operator/staff' costs without providing further detail. This seems wholly inadequate. Based on the proposed weekday operating hours spanning 06:30 to 19:30 Mondays to Fridays (13 hours) plus say a further 5 hours for the second vehicle's peak time and school route operation, this indicates a very minimum of 18 paid drivers' hours on weekdays. An hourly service on Saturdays between say 07:30 and 18:30 would be a minimum of 11 paid hours. Assuming a cost of £13 per hour, including an allowance for on-costs, the cost per annum would be in the region of the following: Weekdays: (18 hours x 253 days x £14 = £63,756) + Saturdays: (11 hours x 52 days x £14 = £8,008). Total: £71,764 per annum.

• ESCC's requirement for an evening and Sunday/Bank Holiday service (see below) would further add the following staff costs: Weekdays: (3.5 hours x 253 days x £14 = £12,397) + Saturdays (4.5 hours x 52 days x £14 = £3,276) + Sundays and Bank Holidays (14 hours x 58 days £14 = £11,368). Total: £27,041 per annum.
• The indicative routes of the core bus service suggested by the consultant would appear to meet the majority of local travel demand, with the notable exception being that they do not appear to directly serve the bus station. There is also some demand to Uckfield Community Hospital, which would not be served by the proposed community bus service. There is no bus stop provision in Uckfield railway station forecourt so this would need to be secured if the minibus service is to call there.

• ESCC estimates the off-peak core bus service routing would take approximately 16 minutes to complete, without including the deviation to/from Uckfield railway station. It would be clearly very poor user of driver and vehicle resources if they were only being used for this period of time in each hour. Whilst it would be desirable to use this available time to increase the off peak service frequency to half-hourly, this would still result in the minibus standing at Downlands Farm for 2 periods of 14 minutes each hour at off-peak times. This lends further to the need to provide a more

holistic approach to the travel access needs of Uckfield, rather than stand-alone provision for Downlands Farm.

• It is not clear, however, how the consultant envisages there will be sufficient time in the timetable schedules to provide both the school service and achieve a half-hourly service at peak times It would have been helpful to have provided with the indication bus timetable schedule.

• In line with National Bus Strategy and the East Sussex Bus Service Improvement Plan, it would also be a requirement to provide an evening and Sunday/Bank Holiday service, which the consultant currently does not propose to offer.

On-Site Highways and Estate Design

• The statement that bus stops on the site would be within 400 metres of all dwellings is welcome.

• In terms of estate design, our preference will be influenced by whether there is any likelihood of future development to the north of the site. If so, it is imperative that provision for a future inter-connection between estates be preserved at design stage, suitable for the use of standard buses (this could be by way of a bus gate). This is necessary for the bus service provided for the development area(s) to stand the best chance of financial sustainability in future years.

• The type of bus routing proposed within the estate is not one we would normally favour, as the bus would run on the same route in and out of the estate which is not the best way of maximising service coverage whilst minimising bus journey time.

• We would strongly prefer an option that allowed buses to use the emergency access road (at least in an interim period before any future development to the north). In doing southbound buses on the A27 would enter Downlands Farm by way of the emergency access road and exit via the main access road. Subject to future bus routing, buses arriving from the direction of Bellfarm Road would enter via the main access road. They would exit left via the emergency access road and then potentially continue north by turning at the new roundabout. This arrangement would allow, for example, for the re-routed bus service 31 proposal (see above section on Public Transport Provision). It should be noted that to accommodate Downlands Farm within the route 31 bus schedule, without incurring the cost of another all day vehicle and drivers, it would be absolutely necessary to minimise the time needed to serve the development.

• Any estate roads that might form part of the bus route must be designed to accommodate standard sized buses, with any traffic calming suitable for the operation of buses and minibuses.

• High quality bus waiting facilities will be required at each on sit bus stop location, including a raised kerb, bus stop clearway, shelter, seating and real time bus information provision.

Off-Site Highways Works (all drawings)

• *Figure 1.1 in the consultant's Community Bus Service note shows the position of bus stops on the existing nearest bus route serving The Drive (northbound) and Manor Way.*

(southbound). The most westerly bus stop on each of these roads are adjacent to the off-site highways works (which are proposed to include drop kerbs and tactile paving) in relation to the pedestrian route improvements (drawing 2001062-104). We ask that a raised bus stop kerb and bus stop clearway markings are provided for each of these two bus stops.

• *With the proposed new pedestrian crossing in London Road, it is noted that the existing bus stop is retained. A raised bus stop kerb should be incorporated as part of the associated work.*

• *At the entrance to Uckfield bus station, off Bell Lane, the developer proposes a block raised pedestrian crossing. The bus station is subject to a programme of improvements in 2022, led by East Sussex Highways . The suitability of the developer's proposal, including its suitability in terms of height, will need to be confirmed by the scheme designer at East Sussex Highways, when this is finalised*

• *In relation to the works in Church Street drawing, we ask that a raised kerb for a new bus stop be provided in the layby immediately south of the junction with The Drive (in drawing 2001061-133). This to include a raised kerb and bus stop clearway markings. We also ask that a new bus stop be provided in the northbound direction of Church Street in this vicinity. Church Street is on a current bus route and bus stops have previously been requested by residents in this area.*

It would appear that the County Council's view of the applicant's community bus proposal for the site is that it would be unrealistic to support the site in terms of public transport, and to add further concern relating to traffic concerns on the town approach roads, there would be delays from the site into the town centre due to the heavy traffic, and so during peak times the journeys are unlikely to be efficient or attractive. There may be scope, however, to enhance the existing service 31 which runs between Cuckfield and Uckfield which could divert into the site and although there would be no other option than to route into Uckfield on an already heavily trafficked route (Bellfarm Road) though service 31 has wider destinations on its route and has scope to reduce traffic on the network should this existing service be enhanced. Further discussions would need to be made with the Passenger Transport Team and bus service provider to explore this option as well as further support to the Community Bus solution which would have greater benefit if a holistic and more integrated approach to encompass the future local plan sites in Uckfield was tabled, to support local growth.

6.2 Travel Plan Framework/Residents Information Pack

The content of the Travel Plan as set out in paragraph 8.7 (Travel Information Pack) is broadly accepted as this lists the incentives and promotional provision of the travel plan. Several comments are provided:
1) Car club – this is proposed and there would be expectation that at least 2 EV cars are provided with charging points within the site along with membership for at least 2

years for 1 member of each household with an initial 50 miles of drivetime. Car club designated spaces should ideally be on adopted roads and have good accessibility to Snatts Road so that there is a wider customer base available.
2) £200 of flexible travel vouchers for use on public transport, cycle equipment, shopping delivery charges per household would be required, managed via the Travel Plan Coordinator.
3) With regard to Easit membership, this is usually through an employment site for which there is not one on the site. How Easit would benefit the site would largely depend on how many employers sign up to Easit where Downlands residents would be employed. This is an unrealistic placement in this framework document as it cannot be influenced by a Travel Plan.

Monitoring is stated to commence at 75% occupancy. This is too late and established travel habits would have been developed without the recognition of the measured being successful or if in fact they aren't. It is expected that the initial monitoring to reveal baseline trips should be 20% (85 dwellings) and then staged over each phase so that monitoring continues for 5 years after the initial survey of the final phase. This is so that the travel plan targets can be measured against and reviewed, with the developer actively applying further or alternative measure if required, tailoring these to suit the travel behaviour over time. The travel plan would also need to rely on the public transport element of the proposal being viable and reliably available to all residents for free for a limited period before being available at an affordable cost and convenience which would be more attractive than using private motor vehicles. The travel plan auditing fee for this site is £6000 and a bond to secure failure to meet the objectives (to be agreed) within the timeframes of the phased Travel Plans (to be agreed) to the count of £100 per dwelling.

7 Full application – SANGS with access and car park

This application seeks consent for a sustainable green open space to support the application for housing growth as submitted in outline. This proposal is made on land to the north/northeast and west of the housing proposal with a new access onto Snatts Road. Car parking provision is shown in two positions, one being from the proposed access onto Snatts Road and a further area for parking is on the western side of the site, accessed through a proposed estate road, south of Longwood Gill.

7.1 Access Snatts Road

Opposite properties 'Padstow' and 'Dean Bank'. This is a standard construction design used for general access points, allowing two-way flows of vehicles and short section of footway on the north side to connect to the existing footway network on the south side of Snatts Road. Maintenance vehicles will likely need to access this element of the proposal and it is usual to see a wider bellmouth and a height barrier. This proposal indicates 43m x 2.4m driver sightlines which accords with the 30mph speed limit. However, for a new access to land currently undeveloped that would attract new vehicle trips, of quantum unknown, requires an indication of the expected traffic likely to be generated. It is understood that the applicant is providing a survey of the Horsted Green SANG to obtain the traffic generation and popularity, to consider the impact it would have on Snatts Road.

7.2 Parking

The parking provision is shown to be 19 spaces, which is similar to the Horsted Green SANG. It is known that this SANG experiences peak periods where the car park is full and results in overspill parking in the bell mouth area. Snatts Road has had complaints reported regarding parking on street causing obstructions, and it is imperative that there is sufficient parking provision made for this element of the proposal. I note that the additional parking area within the housing proposal provides additional spaces. However, if visitors arrive to a full car park at Snatts Road, it is unlikely that they would drive around Uckfield to reach the alternative car park from the A22 access and instead would park on street in Snatts Road. For this reason, a trip and parking demand survey is necessary to be able to verify the impact on Snatts Road that would result from the proposed SANG. The applicant should confirm if the access to the SANG was included in the Road Safety Audit, on basis that the position of the crossing point is close to the proposed access and vehicles turning left and looking right for oncoming traffic may not be focussed on pedestrians that may be crossing the road.

SUMMARY of FULL APPLICATION
Further review of this submission is required to ascertain the suitability of the access and parking provision and what the anticipated impact is likely to be on Snatts Road. The applicant is aware of the concerns of this and it currently undertaking survey work.

Overall Summary
There are areas of this planning application that require further investigation. I have listed the areas where a highway view cannot fully be provided due to insufficient information or incomplete assessment with the series of section summaries.

It is considered that even with the mitigation proposed being able to success, the site is standalone and detached from the town and does not form linkage or any cohesive continuity to the urban form to relate in transport terms. The quoted distances for walking are not measured to the illustrated dwellings located furthest away which would be expected to walk a further 500m+. When considered against the ease of access in terms of reaching the major road network by car, this is likely to be the favoured option. The provision of pedestrian/cycle access from the position of Chicory Cottage requires prominence of the access in the largely rural setting, speed limit reduction and character change to raise awareness to drivers that there is frontage and active movement on carriageway edges and pedestrians crossing the road, though even with this point of access, the continuation of the route towards the town centre via Church street has narrow footways with an elevated section, areas of narrow carriageway and limited places to cross. That is not to say that some sections are unsuitable, but that the route does not offer a consistent good standard, for what is likely to be a 30-minute walk.

As submitted, the application for both the outline and full consent cannot be supported for reasons relating to:

1) All 3 accesses and accessibility measures for active travel cannot be accepted as being deliverable from both a design and highway safety perspective.
2) PRoW routes are inappropriate for everyday use as surfaces and gradients are unsuited to vulnerable users, prams/buggies, and require solid footwear.

3) The community transport option has received objection from the Passenger Transport Team, though there is a further option to explore and discuss.
4) Highway impact on the town centre roads has not been assessed
5) The scheme is detached from the urban fabric of the town, and this prevents any efficient connectivity to the local amenities

ESCC Archaeology

Recommend for approval in principle subject to the imposition of conditions	The information provided is satisfactory and identifies that there is a risk that archaeological remains will be damaged. Nonetheless it is acceptable that the risk of damage to archaeology is mitigated by the application of planning conditions which are outlined in this response.	**YES**

If the Local Planning Authority is minded to grant planning permission, we consider that consideration should be made to preserve in-situ archaeological remains through a sympathetic design, and we ask that the following conditions be applied:

[ARCH 1] No development shall take place until the applicant has secured the implementation of a programme of archaeological works in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority.
[ARCH 3] No phase of the development hereby permitted shall be brought into use until the archaeological site investigation and post - investigation assessment (including provision for analysis, publication and dissemination of results and archive deposition) for that phase has been completed and approved in writing by the Local Planning Authority. The archaeological site investigation and post - investigation assessment will be undertaken in accordance with the programme set out in the written scheme of investigation approved under condition [ARCH 1]
[ARCH 4] Prior to the commencement of development and subsequent to an approved archaeological site investigation [ARCH 1 and ARCH 3] a construction method statement to show the preservation in-situ of significant archaeological remains shall be submitted to and approved in writing by the Local Planning Authority
Reason: To ensure that the archaeological and historical interest of the site is safeguarded and recorded to comply with the National Planning Policy Framework
Relevant National Planning Policy
195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of

whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Detailed Comments:
The proposed development is of archaeological interest due to its location in a landscape with ample evidence for activity from the prehistoric period onwards. Evidence for earlier prehistoric activity in the wider environs of the proposal site include a Mesolithic rock shelter site., whilst evidence for later prehistoric and Romano-British activity in the area includes possible Bronze and Iron Age field systems, and Late Iron Age and/or Romano-British settlement. There is extensive evidence for medieval settlement and agricultural activity in the wider environs of the site, including a potential moated site and a number of medieval farmsteads (including Downlands Farm itself), along with some evidence for iron working in the form of bloomeries and forges. This pattern of an essentially agricultural landscape of fields, interspersed with farmsteads continued into the post-medieval period, albeit accompanied by an intensification in settlement during the course of the period.

To date, the only archaeological investigation within the proposal site itself consists of a geophysical survey, the results of which were submitted as part of this current application. This identified a number of anomalies across the site, although with the exception of several former field boundaries, the archaeological origin of the majority remains uncertain and would require testing through archaeological excavation to categorically determine their date and form.

Unfortunately, although this current application is accompanied by a comprehensive archaeological desk-based assessment, we do not necessarily concur with its conclusions - that the site generally has a low potential, or may only contain features of low importance, for all archaeological periods. Rather, it is our view that this perceived low potential reflects a lack of prior archaeological investigation, and the actual potential of the site to contain buried archaeological remains might be better described as unknown or undetermined.

In the light of the potential for impacts to heritage assets with archaeological interest resulting from the proposed development, the area affected by the proposals should be the subject to further archaeological assessment defined by a ***programme of archaeological works*** and the results used to inform a sympathetic design enabling the retention in-situ of the archaeological remains within the development.
In furtherance of this recommendation, we shall be available to advise the applicant on how they can best fulfill any archaeological condition that is applied to their planning permission and to provide a brief setting out the scope of the programme of works.

The ***written scheme of investigation***, referred to in the recommended condition wording above, will set out the contracted archaeologist's detailed approach to undertake the programme of works and accord with the relevant sections of the Sussex Archaeological Standards (2019).

Local Ward Member (Peter Waldock)

Unless you are minded to refuse the able application please can I call in the application on the below grounds
1) Impact of the application on Lake woods which is a SCNI managed by the Woodland Trust. The impact would include, domestic pets predating the recognised lake woods species inc dormice and birds. Ornithologists have recorded 73 bird species in Lake wood and on sur-rounding farmland, and 99 (SxBRC -Sussex biodiversity Record centre) counted species within 1km, and over 100 bird species of both woodland and farmland including 1 category 4 species which is nationally significant

2) The landscape includes 3 primeval Ghyll valleys formed during and after the last ice age, and those gone before. These features confer unique conditions of humidity and landscape relief allowing scarce and rare organisms to thrive, especially mosses, ferns and liverworts on the plant side and many species of tiny invertebrates such as flies, spiders and millipedes among the animals.

3) The applicant has valued the open land on site as low grade arable land, in reality it is high quality pasture that has been managed organically with just an annual hay cut. The fields and the biodiversity that they contain is an integral part of the environmental support of the wild-life in the vicinity including the ancient woodland. Hay meadows are considered Nationally important, 97% of flower-rich hay meadows have been lost between the 1930s and the mid 1980s." and are a UK BAP Priority Habitat with up to 12 species of Bats recorded in the area including Barbastelle recorded at Downlands Farm.

4) No assessment as to the impact of the development of the open field land on the present species or the ancient woodland has been included.

5) The application includes 13 SUDS which will considerably change the drainage on site and risk impacting on the wet woodland which currently receives drainage water from the pas-tureland

6) The area is the current headwater of Shortbridge Stream, with the volume of potential devel-opment posing a risk to the local watercourse populations of Rare European Eels and Fresh-water Salmon, as considered in Wealden DC's Adopted Local Plan 1998 EN1.

European Eels are UN Critically Endangered, IUCN Red List and UK BAP Protected species - recorded at ponds Budletts Common, and Lake Wood - migration to Sargasso sea believed via culverts to Shortbridge Stream. Shortbridge Stream which is an EU designated salmonid stream with sea trout spawning during the winter and the applicant has not noted the close proximity of this species on their 'within 25 km' mapping

7) Throughout the area are pockets of ancient woodland which are key habitats interlinked to the areas of open grassland – within the application submitted, there are root protection zones of 15m. Based on the House of Lords and Natural England reports, this is not sufficient. It should be a minimum of 50 m to ensure that no

impact is made to the woodland by soil compaction, pollution and to reduce the impact of changes in water drainage and soil exca-vation.

8) The applicant sugest that Sewage will be collected at the bottom of the site (which is the headwater of Shortbridge stream and risks a critical water pollution incident) and then pumped to the top of the site. This suggests that they expect to discharge onto Snatts road but the system here has limited capacity and is quite aged.

9) Part of the development at Downlands can be seen from Friends Clump on Ashdown Forest and thus would have a long-term impact on the views to and from the SSSI of Ashdown Forest. It would also reduce the 'Dark Sky' aspect of this landscape The unusually dark skies over the High Weald have been identified as worthy of conservation by the International Dark Sky As-sociation, any further street lighting even if low impact in this area would potentially impact on this current status.

10) The Absorption of Maresfield into Uckfield is a risk with applications and other applications proposed and discussed by the Bypass in Maresfield. Developing the land between the ham-lets and villages would breach Wealden DC's Environment Policy EN17 Chapter 4 and risk the protection of countryside gaps between existing settlements, creating a continuation of ur-ban creep between Uckfield into Five Ash Down and Maresfield.

11) The roundabout as shown on the application would have a considerable impact on dormice corridors (dormice bridges are not proven), does not take into account that the woodland to be removed contains ancient woodland indicator species and does not mention the loss of the ancient (and overgrown) hedgerow within the more recently planted woodland. The roundabout is also directly below Lake woods and for the prerequisite visibility splays would
impact far more greatly than the application suggests plus is on the crossing point of an initial tributary of Shortbridge Stream.

12) The sustainable transport link by demolishing the cottage and taking a pathway through an-cient woodland drops to the junction of Rocks Road and Snatts road. Even with the amount of spoil and rock (including sandstone rock outcrops) that the applicant sugest removing, the visibility when crossing the road will be poor and the pavement on the opposite side of the road is only just a prams width and tapers quickly to nothing. The impact on the woodland being crossed (Fir Tree Grove) and the historic property to be demolished is far greater than the applicant sugest

13) An access road and 25 space car park is included on Snatts road. No traffic movements and their impact on the road junctions at either end of Snatts road has been included and limited impact on the removal of the many self seeded sapling oaks of up to 15 years old which are present under the mature oaks has been included.

14) Development on this site would severely impact on the important green wildlife corridor link-ing Buxted Park SSSI, Budletts Common, Paygate Wood, Downlands, Lake Wood, Butchers Wood and West Park Local Nature Reserve – therefore contrary to NPPF 180.

This would impact the local ecology which incorporates habitats of County importance, criti-cal natural capital, and BAP Priority, therefore conflicting with NPPF 15, Regulation 63 of The Conservation of Habitats and Species Regulations 2017 and Wealden DC's Adopted Local Plan 1998 EN15 and 16.

Further detailed assessments and mapping should be independently completed to under-stand the potential harm to the various species of wildlife including bat, reptile and amphibian species, rare acid grassland, Sussex rare wet grassland, and ancient wet woodland in this area; there is a risk to the biodiversity of the Ashdown Forest, due to its close proximity and po-tential increased use by householders and High Weald Characteristics (NCA 122), as refer-enced in Wealden DC's Adopted Local Plan 1998 EN6 and EN15 and Core Strategy 2013 Policy WCS12 Biodiversity as a lot of the applicants paperwork is based on desktop studies.
When the application on site was previously turned down on judicial review in 2009 the in-spector stated that this site due to its biodiversity should not be developed. The Campaign for the Protection of Rural England (CPRE) also came out strongly against development on historical and landscape criteria at the 2009 public enquiry. This review occurred only 13 years ago and there has been no new activity or material change to the site or to any of the land from the status it was in at the time of that enquiry.

Rother Pollution Control

Air Quality
As this is a major application, an air quality assessment and mitigation cost calculation, as per Sussex Air (2021) guidance is required. This should be undertaken at this stage, to show that a development of this size (cumulatively with other developments in the area) would not result in a significant impact on local air quality.
Additionally, the cost calculation will provide an indication of the air quality mitigation costs that should be introduced into the scheme.

Potentially Contaminated Land
The Phase I Geo-Environmental Desk Study by BRD, dated April 2022, ref BRD200653-OR2-C has been considered.
This report is considered satisfactory.
The report has made several recommendations, including:
- The area of infilling on site needs to be investigated to confirm that it is shallow in thickness and to establish
if there is any contamination present within the fill materials
- The area around the former chicken sheds need to be investigated to confirm the presence or not of contamination
- Some cursory testing will be required to confirm that the various former farm buildings don't offer any significant risks
- Some cursory testing will be required to confirm an absence of migrating contaminants from the off-site petrol stations and fuel tank.

Therefore, contaminated land conditions can be recommended for this application.

Noise

A. Traffic
At this stage, it seems that some properties will be located approximately 80m away from the busy A22. Therefore,
an environmental noise survey is required. An acoustic design statement should be produced in line with ProPG
(PPG-Noise). The applicants need to show that a good acoustic design process has been incorporated into the
scheme.

B. Consideration of Overheating: Approved Document O
This is advisable at this stage and could be incorporated into the noise assessment. This is because noise levels at night need to be considered for ADO.
Incorporating this into the noise assessment would help determine the type of overheating strategy that might be applicable for the future properties on site, especially considering that summer temperatures are increasing in level and frequency. The overheating strategies may vary across site depending on location and proximity to the A22. Hopefully, provided a good acoustic design process as per ProPG above is followed, most (potentially all) future properties might be able to use simple methods to remove excess heat during overheating events.

C. Noise from Air Source Heat Pumps
The design and access statement outlines that there is an ambition is to use air source heat pumps for the properties on site. While Environmental Health is absolutely in favour of sustainable heating methods this does mean that there will be over 400 air source heat pumps spread across this location. Additionally, some parts of the
site, away from – or shielded from the A22 could be quiet at night. Noise from ASHPs should be considered at this stage and consideration of this noise could also be included in the noise assessment.

While in theory, each ASHP could be installed under PD, this may not be advisable. Simply because (depending on location and proximity to the A22) sound levels will vary across the site and in some locations, ASHPs may be highly discernible against background noise levels, particularly in the evenings and night-time periods.

Consequently, there is the potential that some ASHP noise could cause nuisance and amenity issues, resulting in complaints made to the WDC. Such complaints would need to be investigated under Statutory Nuisance legislation, irrespective of any installation under PD. If a Statutory Nuisance is found to exist, caused by an ASHP then Environmental Health are legally obliged to serve on the person responsible for the ASHP a S80 Abatement notice under the Environmental Protection Act 1990. Alternatively, action may be undertaken under the Anti-Social behaviour Crime and Policing Act 2014.

Therefore ideally, the locations of future ASHPs and any noise mitigation required to ensure there isn’t a detriment to the quality of life of those in the locality of the ASHP(s) or a likely occurrence of Statutory Nuisances should be considered at the planning stage.

Recommendation

Insufficient information: Noise and air quality assessments are required.