The Planning Inspectorate, Temple Quay House
2, The Square
Bristol, BS1 6PN

Wednesday 29th November 2023

Dear Sir/Madam

**Planning Inspectorate ref: APP/C1435/W/23/3330872**
**Site: Mockbeggars, Budletts Common, London Road, Uckfield**
**Appeal: By Obsidian Strategic Asset Management Ltd**

# 1. Introduction

1.1. This Representation is put forward by a local residents' steering group representing the community and refers to the above planning appeal. We are members of the Coopers Green Residents and Neighbourhood Watch Associations, and write on behalf of the 74 residents who wrote to object against the original planning application. We are against the Appeal proposals, and fully support the Planning Committee's refusal of the original application dated 22nd June 2023. We respectfully urge the Inspector to refuse the Appeal.

1.2. As residents, we believe we have a far greater knowledge of the issues and the potential harm to our community and environment that would be caused by this proposed development than the mostly desk-based, and profit-driven, submission from the developers.

1.3. Under the new legislation of the Levelling Up Bill, it specifically lays down that the Local Community should be involved in the Planning Applications affecting their Neighbourhood. Harm to the residents is acknowledged by the Developers in one of their submissions. Mockbeggars Farm is a serene and tranquil rural area. Residents on the east and north boundaries of the development will be overlooked by the top line of houses on both east and the south side, irrespective of any proposed planting, causing visual intrusion of their properties, loss of privacy and a potential loss of light for the eastern dwellings.

1.4. At the Full Council meeting on 22nd November 2023, the newly elected (May 2023) Green and Liberal Democratic alliance for Wealden confirmed, and Full Council approved, a refreshed Vision for Wealden. We feel that this is a material consideration which should justify refusal of the developer's appeal, due to the policy guidance adopted by the new District Councillors. I would like to draw the Inspector's attention to where the Mockbeggars application does not meet the council's Vision for Wealden:

- CE2: the development will harm the countryside and biodiversity
- CE3: the location of the development encourages use of cars and is therefore not sustainable

1.5. We will respectfully demonstrate that:

- This development does not fall within a sustainable location as suggested by the developer, and therefore does not represent a sustainable form of development.
- The adverse impacts of the development significantly outweigh any benefits of the development.
- The development will cause extensive and irreparable ecological damage to connected habitats and ecosystems in a biodiversity opportunity area linking an SSSI to other designated nature sites.
- This housing estate, set in open rural countryside, will result in a permanent and deleterious change to the heritage, character and landscape of the location.
- Despite the Transport Assessment and subsequent material submitted which concludes that there are no objections we, as residents, can attest to the opposite.
- There are significant heritage and non-designated heritage assets that will be affected by the development that are not included by the developer
- There are major issues surrounding flood risk to non-designated heritage assets, as well as pollution risks to protected watercourses and safety issues for London Road.

## 2. Principle of Development

2.1. Sustainable location

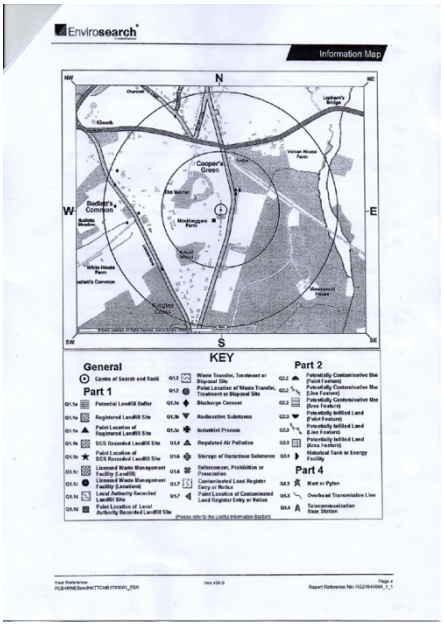
- The appeal site is located outside of the defined settlement boundary (Chapter 19 of the 2019 Wealden Plan). It is in open countryside in relation to planning policy.
- The site, which the developer claims will reduce the need to travel by car, will predominantly be car-reliant based on the community's long experience of the area. Even with a nearby bus stop, we still have to use our cars to access the nearby services such as the train station, supermarkets, High Street, or to buy a pint of milk at the Village Shop at Small Tesco (Browns Lane) Maresfield or Five Ash Down, or the Waitrose garage at Blackdown Roundabout.
- The Doctors' surgeries are a car journey away, as are the supermarkets, primary and secondary schools are a drive, work in the area is a drive which is often out-commuting, children's clubs are also a drive. Inclement weather and dark nights will exacerbate this issue.
- Given the proposed development is on a very busy and fast main route out of and into Uckfield, the volume of traffic on London Road is unpleasant and dangerous (5,000-10,000 cars per day noted in SUSTRANS, 2018), and is not conducive to regular walking especially for families with young children, and the elderly. The pavements in North Uckfield, especially from Budletts Roundabout to Ringles Cross are not adequate and not safe.
- Sustainable development now includes provision of cycling routes for which no safe routes have been offered. With any road supporting more than 5000 daily cars, SUSTRANS recommends for safety reasons the provision of a cycling route 3m wide and separate from traffic and pavements. This is not deliverable between Budletts Roundabout and Ringles Cross. The developer claims cycling to and from the site as an argument for the development to be sustainable. Given the heavy traffic and obvious safety issues for cycling on London Road, especially for children

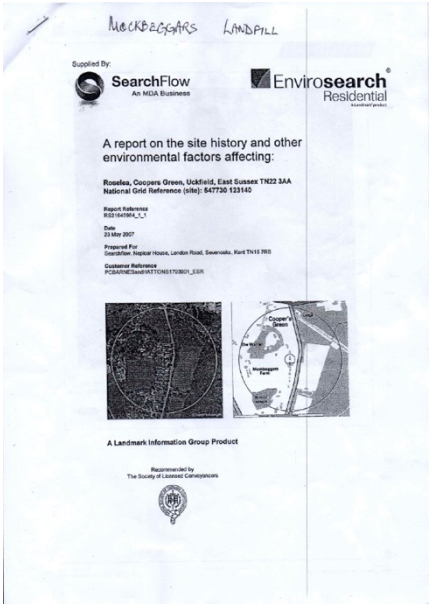
and young families, and the lack of a dedicated cycling route, we believe that this argument should be discounted.

- One of the NPPF's social objectives is to support strong, vibrant and healthy communities. This development does not integrate into the local community at all. In fact, with only an entrance on London Road, the development is completely isolated within its own bubble, with no immediate access to local communities of Coopers Green, Five Ash Down and Snatts Road.
- Examples of the adverse impacts of this development which significantly outweigh its benefits will be highlighted throughout the document.

2.2. Landfill

- Section 6.2.5 of the Statement of Case states that "…the site is acceptable in principle for residential development."
- We cannot find in any of the developer's original application documents nor in the Statement of Case any mention of the landfill site that is located on the East side of the development site (see below). Has this indeed been raised as a potential issue, or is it a further indication that the developer either ignores inconvenient evidence or simply that they have not fully researched in a professional and diligent manner the myriad issues which argue against this application?




## 3. Benefits of the Proposed Development

3.1. Claimed Economic Benefits

- The developer is contributing funds to the local SANG. However, this contribution is misplaced and we feel should not be counted as a benefit. Mockbeggars Farm is closer to the Ashdown Forest than to the next nearest Uckfield SANG at Ridgewood on the other side of Uckfield, which is already heavily used and will soon have to accommodate crowds from a total of 1,000 houses. The crowded local SANG, combined with the distance required to access it, mean that residents of the Mockbeggars development will gravitate to Ashdown Forest where Forest Rangers have recently stated that visitor numbers were increasing and had already

done so by 100,000. Residents will also gravitate to the Buxted Park SSSI, which is also under immense pressure from an increase in visitors.

- This, we believe, is another reason why the Mockbeggar site is in the wrong place, and why it will further promote use of the car.
- Therefore, a contribution to the local SANG does not in this instance qualify Mockbeggar as a sustainable development. Other developments which are also nearer to Ashdown Forest than the local SANGs are further increasing visitor pressure on the habitats of the Forest and we can find no yearly cumulative assessment in writing of this impact. With an ever increasing number of developments in and around Uckfield, we believe that it is imperative for planning decisions to be made on the cumulative effect of development not simply on a case by case basis.

3.2. Claimed Social Benefits

- There appears little social benefit in pursuing this Planning Application other than the so-called need for more houses. With a stretched infrastructure for the Town and the further building of 750 houses on the Ridgewood Estate in Uckfield (we understand that the developer is attempting to sell on this Phase due to lack of demand), one deeply questions the need for more to be built in the present economic climate where existing and new build houses are struggling to sell.
- It is deeply ironic that the developer claims in 5.3.11 that "the Council has only managed to deliver 176 dwellings in the last monitoring year 2021/2022" as a justification for this unwanted and unnecessary development. We understand that around 8,500 homes have already been approved and are awaiting construction in Wealden. We, as members of the public, simply do not understand the developer's claim that the housing target has not already been met. Surely it is now incumbent on the developers to deliver on the housing that Wealden has approved which will hit the government's targets, before attempting to build more inappropriate housing in the wrong location, and lose one of the character gaps providing a unique old character landscape between Uckfield, Buxted and Maresfield settlements?
- We believe the scheme to be in direct conflict with our understanding of a major Wealden Planning principle, namely that of avoiding Coalescence. A principle, we believe, designed to prevent communities simply being swallowed up into Uckfield as ribbon development continues apparently unchecked and with no regard to either development restrictions outlined in the North Uckfield Development Boundaries as specified in 2019, or to placing ancient landscapes, such as Budletts Common, and the rural nature of North Uckfield, at great risk.
- We do not believe that the nominal contribution of the Development's 60 houses to Wealden's target of 7,272 new homes over five years outweighs the harm that the development will cause.
- A development which removes parking outside the houses of existing residents (see Traffic section), only to provide two parking bays per new house at the new development cannot be claimed to be a social benefit to the community.
- There is insufficient commercial business in the Town of Uckfield to attract workers to the area with the consequence that much of the populace travels further afield by car. Changes such as a new runway at Gatwick and associated

development will only increase car usage with the inevitable increase in carbon emissions.

- Thus the site cannot to be said to be Sustainable.

## 4. Inefficient Use of Land

4.1. The Mockbeggars site is being developed at only 16 dwellings per ha (60/3.62), which we accept is the result of recommendations by Wealden Planning officers. However this is an unsustainable and highly wasteful use of greenfield land. Yet by the same token, to develop more densely would b

4.2. e wholly inappropriate given the countryside location. This demonstrates precisely why higher density development in existing urban areas is inherently more sustainable than green field sites, especially in terms of land use and reduction in harm to the countryside and biodiversity.

4.3. There are already multiple applications in and around Uckfield that have received outline planning permission: the development of the next phase of Ridgewood has 750 houses on-stream, another 20 at Streatfeild House, 35 at Durrants Field, 40 at Five Ash Down, and 25 more at Maresfield, 90 at Eastbourne Road, 119 just finished at Mallards Drive, 50 at Blackboys and 58 at Framfield, 203 and 50 at East Hoathly all being advertised as accessible to the services of Uckfield. To lose another green field site in the face of losing so many already we believe is not warranted given the broad range of harm involved.

## 5. Ecology




5.1. Mockbeggars Farm forms a key part of the vibrant wildlife corridor linking the Grade II listed Buxted Park (with its Site of Special Scientific Interest) to the Downlands area and beyond.

5.2. It borders Ancient Woodland to the South and mature woodland to the North, and the wildlife is richly diverse, especially given the significant bat population, which has been acknowledged by the applicant. Fallow and Muntjac deer use the Mockbeggars fields as a corridor. There are at least two breeding pairs of Tawny Owls (Amber listed Bird of Conservation Concern) in the Ancient and mature woodland abutting the site; Starlings (Red listed Bird of Conservation Concern) feed amongst the sheep on Mockbeggars; Sparrowhawks (Amber listed Bird of Conservation Concern) hunt in the woodland on either side of the proposed site and use Mockbeggars to move between the two; Bullfinches (Amber listed Bird of Conservation Concern) use the wildlife corridor, especially in the Spring; Red Kites (Amber listed Bird of Conservation Concern) hunt over the area.

5.3. The WDC Biodiversity Officer no longer objects to the application, even though Mockbeggar is clearly in a Biodiversity Opportunity Area. The graphic shows how important Mockbeggars is providing the stepping stone maintaining links between Buxted Ancient Woodland and SSSI through Budletts LWS and across to Lake Wood LWS and LGS. Consequently we would like to bring a variety of issues to the Inspector's attention that have not been assessed, or not assessed correctly by the parties involved.




5.4. Further, a Shadow Habitats Regulation Assessment on Ashdown Forest prepared by Aspect Ecology (September 2023) claims that the development will not result in an adverse impact on the integrity of any protected sites, in combination with other plans and projects.

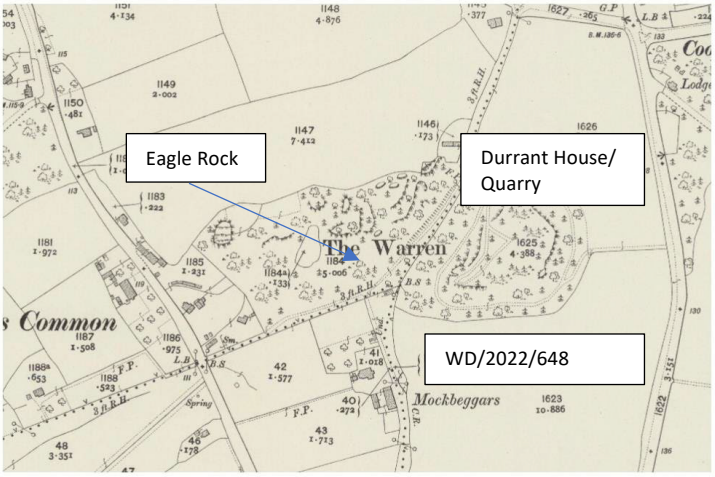
5.5. The developers plan for ground and surface water to flow into Shortbridge Stream, a migration path for the UN Critically Endangered European eel.

5.6. Ground and surface water run-off will affect the water quality, and it represents the danger of a major pollution event if the system fails, severely endangering downstream freshwater ecosystems including a migration path for the European eel and multiple other protected species. Please see Sewerage section below for further details of why a major pollution event is likely if not inevitable.

5.7. The developer has advised that they have achieved a Biodiversity Net Gain in habitat units and hedgerow units. The biodiversity net gain claimed is 0.98%, which is a risible increase and should be discounted completely as a rounding error, or as an attempt by the developer to massage the figures to show a positive result, however small. The hedgerow units net gain is claimed to be 68.85%. This claim must be examined closely. The removal of a very old hedgerow, which is a rich habitat for multiple species, to facilitate the entrance to the development and the visual splays required, is destruction of a valued biodiversity resource – see NPPF 15,174(a). The removal of this hedgerow is required by Highways to overcome the visibility and safety issues surrounding the entrance. The developers plan to replant but, as required by Highways to ensure visibility standards, the new hedge will have to kept permanently to a height of approximately 60cms. This will never represent a viable habitat. The developer might gain in "hedgerow units", but this is a meaningless figure and cannot the outweigh the permanent damage done to the environment, in direct contravention to the NPPF.

5.8. In response to the initial planning application, it was pointed out by Vivienne Blandford, a prominent local Landscape Archaeologist, that the developer had not taken into account the heritage, bio- and geodiversity impact at properties adjacent to the development site, such as Durrant House (formerly The Warren), the Quarry and Eagle Rocks (LWS), Budletts Common, and Budletts Common Rocks. Their environmental needs are of material significance.

5.9. According to Vivienne Blandford "Adjacent to the development site are substantial Ardingly sandstone outcrops. Best visualised in the early Ordnance survey map of 1908 (below), these are massive sandstone outcrops with overhangs and splits in the rocks which are not dissimilar to those found locally at Rocks Nature Reserve in Uckfield and slightly further afield at Eridge Rocks. No archaeological investigations have taken place here, and the possibility of pre-historic, and more specifically Mesolithic, activity is high."




*1908 map showing Durrant House (formerly the Warren) and the extent of rock outcrops adjacent to planning site.*

5.10. Specifically, this development would make an environmental island of Durrant House and The Quarry, which will effectively destroy the wildlife corridor, between Lake Wood, Budletts Common, Mockbeggar Farm, Durrant House and the Buxted Park SSSI, especially given the 35 unit housing development that is already approved on Durrants Field.

5.11. The developer has made no attempt to assess the damage that will be caused to this and other adjoining areas, which are of biodiversity, geodiversity and historical importance (see Heritage and Archaeology section below). We respectfully request that the Inspector before or during the enquiry carries out an accompanied or unaccompanied visit of Durrant House and the Quarry, Budletts Common, Budletts Common Rocks, and Eagle Rock.

5.12. The Council's Biodiversity officer has accepted plans for a "bat corridor" linking existing woodland parcels on either side of the development. We strongly dispute this opinion. There has been no bat assessment of the Eagle Rock LWS nor of Durrant House and The Quarry, and we are deeply concerned about the methodology applied, as we feel that there are significant unassessed bat habitats which will be fragmented and isolated. Whilst it is the wrong time of year to make assessments, we are in conversation with the Sussex Bat Conservation Society for assistance. Given the timing, we will endeavour to submit additional information nearer the Appeal date if that is acceptable to the Inspector.

## 6. Heritage and Archaeology

6.1. Whilst the developer commissioned a Heritage Statement by Savills and the WDC Conservation Officer raised no objection to the development, we maintain that there has been an inadequate assessment and a lack of understanding of the surrounding heritage, both of landscape and built form.

6.2. Uckfield Town Council stated in their objection they felt that Mockbeggars and its surrounds should form a Conservation Area. The community agrees with the Council that this should occur in view of the unique character of Budletts Common, the heritage of Uckfield, Buxted and Maresfield medieval landscape, the archaeology, biodiversity, ecological stepping stones, geodiversity and Local Wildlife Sites.

6.3. According to NPPF 16, applications are supposed to conserve and enhance the historic environment, and this application does not deliver an enhancement of heritage assets (quite the opposite), nor does it provide a strategy for the conservation and enjoyment of our historic environment.

6.4. The following are designated and non-designated assets that the Developer has not recognised nor assessed. These heritage assets demonstrate that there is a pocket of buildings of great historic interest between Lake Wood and Buxted Park, and the Redline Boundary has not reflected on the heritage impact in this corridor. We respectfully request that the Inspector carefully examines the heritage assets that we believe are being ignored by the developer.

- **Spring Cottage**





A known heritage asset recognised by Historic England, Spring Cottage is the ‘moated’ property overlooking the development site, which was visited by the Queen when Prince Charles (Now King) attended Nursery there while the Royal family visited Sussex. It is directly opposite the entrance to development site. Historically Spring Cottage was the last cottage as you left Uckfield before the Maresfield Parish marker. It is “moated” to stop groundwater flooding the property.

**Mockbeggars Farm**





A former coaching inn and barn of Grade II* Buxted Park estate (which is also a SSSI and a National Monument for its medieval landscape), Mockbeggars Farm shares a boundary to the West of the development.

**Durrant House and The Quarry**





View from Durrant House of the development site.

Durrant House lies directly North, above the fields at Mockbeggars. The development will be clearly visible and will severely disrupt the area's tranquillity and amenity, adversely affecting the rich ecology which is to be found in such rare sandstone landscapes. Formerly known as The Warren, Durrant House is a highly unusual Arts and Crafts country house built by local master builder Stanley Durrant, in sandstone on the site of a sandstone quarry (The Quarry). On completion in 1939, the house was immediately requisitioned by the MoD and the large, flat roof was reinforced to support a Bofors anti-aircraft gun to fire on German bombers on their way to London for the duration of WWII.

- **Eagle Rock**






Located to the west of Mockbeggars is an RIBA Award winning house. Eagle Rock has twice been proposed for listing, and the architect has requested it be listed on his death. It is featured on the cover of the Architects Journal, illustrated in Pevsner's "Buildings of England" and picked as one of the top 100 houses of the 20th century. Eagle Rock is part of the University degree architectural syllabus. Ian Ritchie CBE RA designed the house amongst the rocks, to have the least impact on nature. The client Ursula Colohan commissioned the head gardener from Wakehust Place to design a garden attracting wildlife, planting exotic trees and shrubs. Francis Rose discovered rare mosses on the rocks in 1952 and recommended to Wealden Council in 1995 that the site and rocks should have SNCI status.

- **Budletts Common**





Left: taken from outside the development site.

Budletts Common, taken from opposite the development site, was previously called Malling Budletts as far back as 1585, The land has a Historical Medieval background with records we believe going back to the 9th century. Mockbeggar Farm is historically part of Budletts, which is classed as Common Land, on the East Sussex County maps. Whilst the land is not officially registered as such with the County Council, traditionally Common Land cannot be built upon, and certainly not without permission from DEFRA. We do not believe that the developer has taken this into account.

- **Whitehouse Farm**

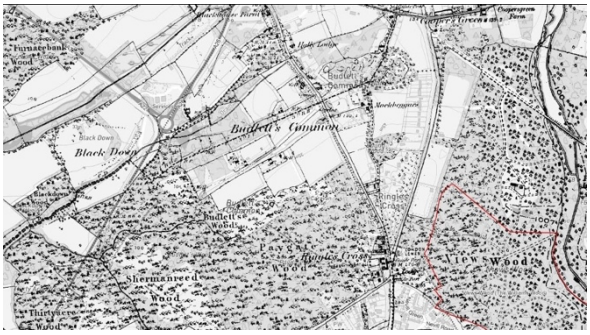


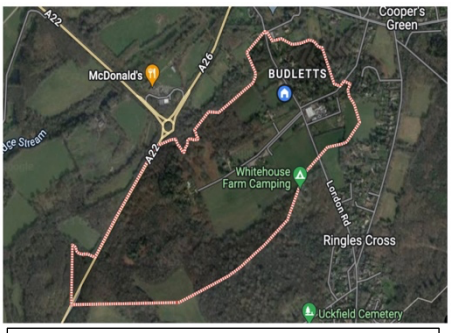
Taken from proposed entrance to the development site across London Road.

Whitehouse is a 19th century farmstead, bearing a remarkable resemblance to Budletts House, which is Grade II listed. Being elevated, the development will dominate the non-designated heritage asset, which forms an integral part of the rural open countryside outside of Uckfield Development boundary and an important countryside gap between Uckfield, Maresfield and Buxted. Whitehouse's Common setting, shared by Spring Cottage, has been conserved and protected for centuries and we firmly believe that the development harms this quiet ancient landscape, much valued by the community.

## 7. Landscape Visual Impact

7.1. Mockbeggars is part of Budletts Common, (see below) an important well-preserved Medieval Heritage Landscape, which in turn historically formed part of Buxted Park, a Grade II* listed and a Medieval National Monument. Budletts Common also adjoined the Streatfeilds Estate along London Road.




Map showing the borders of Budletts Common, which includes Mockbeggars. Google 11/2023.

7.2. Mockbeggars is also within the High Weald NCA122 character landscape. See map below where the black dotted line clearly shows this (in the area of the word "Uckfield" below the junction of the A272 with the A26).

7.3. The visual landscape in this area is unspoilt and beautiful. Immediately beyond the development boundary at Ringles Cross and Snatts Road, the Paygate Wood and hedgerow provide an attractive transition of mature ancient woodland, and you find yourself wholly in the countryside between Uckfield and Maresfield with attractive ancient landscape on either side of London Road. The eye is drawn to Spring Cottage, a known non-heritage asset which is recognised by Historic England, and White House Farm, before approaching Grade II listed Budletts House (Blue Asia). Budletts House overlooks the Mockbeggars fields. The development would seriously affect this visual landscape setting.

7.4. The top end of the Mockbeggars development will be elevated, and therefore it will dominate the landscape and directly affect the wider landscape character and visual setting. We therefore fundamentally disagree with the developer's assessment that the site will do no visual harm.

7.5. The original parish stone which marks the historic settlement boundary of Maresfield, is situated close to Spring Cottage.

7.6. The removal of a very old hedgerow to facilitate the entrance to the development and visual splays required will damage this intrinsic character enjoyed by the community entering and leaving Uckfield. The prominent development will be out of keeping in the interests of visual amenity. Other parts of Uckfield have lost this character and therefore the need to preserve the North is felt keenly. The development intrudes on the established hedgerow and the ancient woodland. The intrinsic character and beauty of Budletts we believe is covered in the NPPF to be protected and conserved, and the development would overwhelm the local character and is not sympathetic to the history of Budletts.

7.7. Further we believe that the setting of the hedgerow to the area is a material consideration, and the harm by removing and replacing it with new growth, then keeping it to a height of 600mm as required by Highways will not screen the development as offered by the scheme, thus causing permanent harm to the landscape.

7.8. After leaving ancient woodland Paygate Wood, the attractive footpath Uck 1/1 winds though meadows and hedgerows, which are seasonally enjoyed by many residents with buttercup hay meadows prior to hay baling, and sheep grazing in winter. To witness an estate in this environment on the rising topography of Mockbeggars will be detrimental to this countryside setting between Uckfield and Maresfield and will be harmful to the character and appearance of the footpath. The Mockbeggars Hedgerow being reduced in height will not mask the development in summer and will be even more pronounced in winter. Chichester Caravans and Leslie Cars are not seen from the footpath, which travels through countryside with a working rural country farmstead. Therefore the distinctive character of this Budletts Common footpath will be lost. The scheme proposal is at odds with the character of Budletts Common noted throughout history from the 9th Century.

## 8. Sewerage and Drainage

8.1. The proposed development at Mockbeggars will double the population of this small parcel of land. Most of the properties surrounding the field, again a semi-rural area with little infrastructure, do not have mains gas, nor mains sewage, instead relying on septic tanks and expensive oil storage systems.

8.2. To solve the problem of sewage disposal, Obsidian propose that the Mockbeggars development will have a sewage pumping station to serve the minimum of 60 new homes. The average household discharges approximately 250 litres of effluent per day. Therefore the sewage system will have to cope with an extra 21,000 litres of untreated waste *every* day. This would fill six standard sewage vacuum tankers amounting to approximately 168 tons of sewage. Obsidian also needs to install electric submersible pumps to push all this waste uphill to Coopers Green Road to link up with the main sewer.

8.3. The Sewage Treatment Plant appears to have been placed on the sources of both ground and surface water above ponds, Spring Cottage, a non-designated heritage asset) and Budletts Common watercourses which lead to Shortbridge Stream, a spawning ground for the UN Critically Endangered European eel.

8.4. On paper this all sounds fine, but the reality is starkly different. The sewers in Wealden, and I quote Southern Water "are between 50 to 100 years old" and the aging, almost antique, pipework is incapable of handling such an increase in volume and pressure. Sewer collapses in Wealden are the highest in the country, and the recent ongoing events in Heathfield have brought this into sharp focus.

8.5. Dr Stephen Hall, who has recently given evidence about sewerage to the Downlands Farm appeal, has been in communication with us and has given a devastating appraisal on the developer's proposed sewerage solution. Apart from damaging the rest of the sewerage system and the very real prospect of collapses to the ageing sewers, the proposed pumping system will almost certainly fail from time to time due to mechanical and electrical issues. The reserve capacity of the system is only for 24 hours. The pumps are submersible and have to be raised out of the sewerage plant to effect repairs or replace. This can take time and resources. As a stop gap measure, tankers would need to take away the waste sewage which could build up and overflow into the surrounding land, a habitat for rare species.

8.6. Unfortunately, as we are now witnessing, extreme weather conditions are common and may impede the use of emergency tankers. Should the problem not be fixed within 24 hours, the sewage will spill out and pollute Shortbridge Stream, and the adjacent land and water courses. Any pollution or contamination of the aquifer, surface water and groundwater will flow directly to the Stream – one of the most important in the area for a migration path UN Critically Endangered European eel and spawning grounds for endangered sea trout.

8.7. Examination of Southern Water's laptop study for the Mockbeggars development reveals some additional worrying facts. It will only be possible to connect a few residences pending the "necessary reinforcements" to the sewerage pipes and this will take a period of time to "align". According to Southern Water, it will take them two years to "align" the system with a caveat for a longer period for the almost certain additional work to be completed. This brings into question the very viability of the proposed development.

## 9. Flood Risk and Hydrology

9.1. The name Budletts means “plenty of Springs”, and as Mockbeggar is part of Budletts Common we believe the building of houses will have severe consequences on the flow of water, and that the developers have completely ignored the many potential issues that flow from it.

9.2. We are deeply concerned that groundwater at the proposed site is far closer to the surface than 10 meters as claimed in the developer’s original application. This is evidenced by:

- Standing water (right) at the development site, which we believe also marks the position of the landfill (see section 2.2).



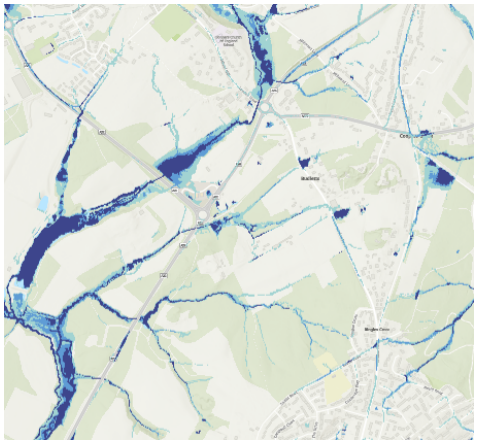
- At Mockbeggars Farm, which is adjacent to the development site, the water table is only one meter from the surface, and in winter and during periods of heavy rain it rises to ground level. This is clearly discernible, and Charlotte Wales, the owner, can attest to the fact that neither the developer nor consultees have assessed the situation.
- There is a well in the basement of Mockbeggars Farmhouse which never runs dry, and is approximately one metre below ground level. We are extremely concerned that changes brought about by the proposed SUDS would dry out the cellar construction, which has been damp since the house was built, and cause serious subsidence to the house.
- The stream at Budletts already floods to areas of UK BAP priority habitats wet woodlands and Shortbridge Stream, and did not dry up in the drought of 2022. We believe that the effects of changing the watercourses at the development site have not been adequately assessed and might have disastrous consequences on the surrounding habitats.



9.3. There are other issues:

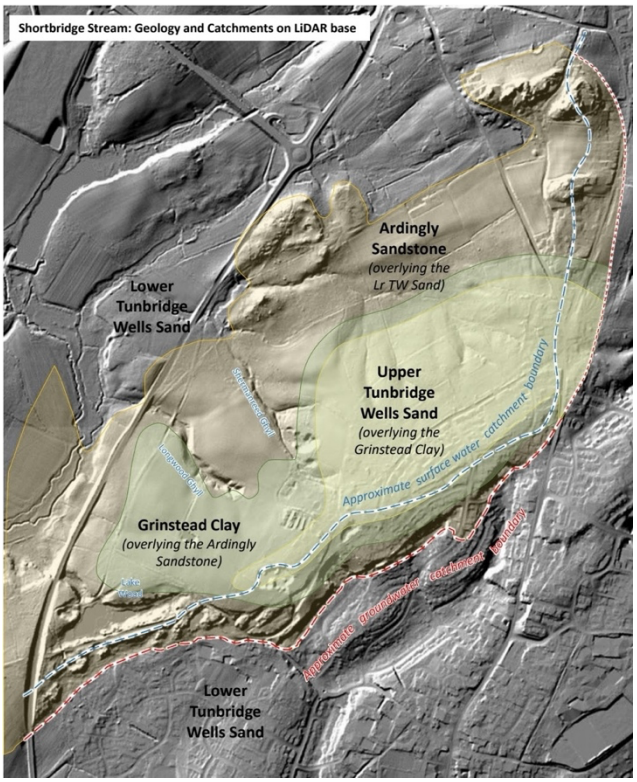
- Rainwater would normally be absorbed by the ground, but the construction of 60 houses will direct this flood to the bottom of the hill and then into the surrounding watercourses. Unfortunately, the watercourses, a source of rare species, are well known in this area for flooding. One property, the non-designated heritage asset Spring Cottage, the clue is in the name, has a ‘moat’ surrounding it to deflect the rainwater.
- We are concerned that contaminated water that diffuses over the site would diffuse over surrounding woodland.

- Engineering during the course of development might fragment ancient water courses and will harm “stepping stones” of the environment. NPPF 15 & 16, para 179a states plans should a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.*
- The map shows the water courses that emanate from Mockbeggars make up part of a wildlife corridor/stepping stone that connects downstream to Budletts Common and Shortbridge Stream and upstream to Ashdown Forest, providing a sensitive route to support links between the Ashdown SSSI via a water corridor to Shortbridge Stream. Ashdown Forest have applied for grants from the Landscape Nature Recovery Strategy of which local habitats will play a pivotal role for Nature.



9.4. The Water Framework Directive requires that groundwater and surface water conditions are conserved and maintained. We note that the Bird-in-Eye development (Appeal ref. APP/C1435/W/22/3307820) was refused in part because of question marks about sequential testing. Is there a similar concern regarding the Mockbeggars watercourses?

9.5. In addition, the water flows from Mockbeggars springs and groundwater to Budletts Common cross the wet ancient woodlands to Shortbridge Stream. We are deeply concerned that contaminated groundwater will impact residents’ property such as Spring Cottage and Mockbeggars Farm, as well as the agricultural barn proposed for conversion. See right for the Shortbridge Stream Geology and Catchment areas.



9.6. There is a pond with documented existence of great crested newts on the perimeter of the development site (close to Mockbeggars Farm). In addition, there is at least one pond close by (owned by Chris Hughes whose house shares a boundary with the development site). To our knowledge, neither site has been assessed nor acknowledged by Aspect Ecology or the developer.

9.7. We are deeply concerned that changing the water courses at Mockbeggars will have the unintended consequence of impacting priority habitats, and we do not believe that anyone has assessed the Mockbeggars site in this context. Water courses are so important that to fracture them would be of material harm and a reason to refuse the Appeal.

This picture is of London Road, at the entrance to the proposed site, in November 2023. The drains had previously been cleared twice by the Council in swift succession. We believe that this water is the result of groundwater rising from Mockbeggars, not blocked drains, and as such we believe that this should be a material Highways issue that has not been addressed. According the Arcqis map, flooding such as this might be expected once in 30 years. As residents, we can attest to the fact that this happens every time it rains heavily.



https://www.arcgis.com/apps/mapviewer/index.html?layers=befb443e57404e9b8707cddf28c56eca

## 10. Impact on Mockbeggars Farm Smallholding

10.1. Mockbeggars Farm smallholding is situated immediately to the West of the proposed housing estate.

10.2. The proposed residential development will cause undue harm to this smallholding in terms of noise, pollution, animal welfare, and farming amenity, and will have a deleterious effect on the surface water and the groundwater quality used for livestock, feed, and vegetation by the owner.

10.3. The impact on the smallholding will be significant, with anticipated complaints regarding noise, smell, pollution, and outlook from both parties, affecting living conditions both for humans and for livestock, with new residents making complaints against an existing smallholder who is continuing a documented tradition dating back to at least the 1600's, for keeping farmyards animals such as pigs, geese, ducks, hens and cockerels.

10.4. The future impact to animal welfare and amenity from a perspective of space, grazing, suitable lighting, noise levels, water quality, arable and grazing land and interference from humans is of substantial concern.

10.5. The proposed estate would dominate a rural farmstead, which was the former coach inn and the waggon barn from the Buxted Park Grade II* estate, and the high density housing estate will eradicate the important setting, skyline, and

landscape within the site contributing to the heritage setting of the farm. Creating a suburban character and appearance would contrast starkly with the farmyard and agriculture barns , and would be unacceptable and incongruous.

10.6. Current screening and SANGS propositions for the proposed site would cause significant harm to the smallholding in terms of land drainage, and parchment of grazing land used for livestock, further impacting animal welfare, and causing a substantial increase in operating costs for the current landowner.

10.7. This proposal causes undue harm to the operation of an existing smallholding, it further reduces our green spaces and sustainable farming operations locally, and severely impacts the character and appearance of both Mockbeggars Farm and the adjacent Agricultural Stagecoach barn.

10.8. We are concerned that contaminated water from the site would diffuse over surrounding woodland.

10.9. The oppressive and overshadowing effects of the scheme's housing estate, proposed drainage solutions, boundary treatments, from an open field setting, would leave the current owner at a permanent disadvantage, in a historic property built facing the proposed site.

10.10. Of the 18 windows of Mockbeggars Farm, 14 look out towards the proposed fields. The scheme provides no mitigation for this loss of privacy and seclusion, and indeed it would be impossible to do so.

10.11. We consider the harm to the living conditions of the current owner of Mockbeggars Farm have not been considered, surveyed, nor accommodated, and would also not be satisfactory to the environment or future occupants of the proposed housing estate.

10.12. The effect that the proposed development would have on the character and appearance of Mockbeggars Farm, which is of heritage importance former coach inn of the Buxted Park Grade II* estate, we feel should be one of the reasons to dismiss the appeal.

## 11. Highways

11.1. The Transport Assessment concludes that the proposed development should not have any adverse transport impacts, and therefore there is no sound transport based objections to the proposals. However we, as residents, would like to draw the Inspector's attention to a variety of safety and other issues which already impact our daily lives (which presumably the developer and Highways are unaware of) and which would be materially exacerbated by the development. Taken together, we believe that there is a strong argument to withhold planning consent on highway grounds.

11.2. The SUSTRANS report indicates in excess of 2.5 million vehicular movements per year with an average speed of 53 mph. Please note the word "average". Having crawled through a frequently traffic-clogged Uckfield, drivers are released into a long and straight road and they accelerate to high speeds, ignoring speed limits, to Budletts Roundabout.

11.3. Wealden Highways believe that the site presents no increased risk given that they are recommending an extension of the 40 mph zone further down towards

Budletts, putting double yellow lines outside Ringles Cross Cottages to prohibit parking. We believe, as a community, that the loss of parking facilities outside the residences of Ringles Cross Cottages, a practice that in itself proved to be a very useful deterrent to speeding, is an unfair balance against the two parking spaces per house at the new developent being proposed by developers. This belief is hardened on learning that one of the cottages contains an older lady with mobility problems, for which the increased distance to be covered in moving from the proposed new parking area – always assuming that space can be found there – to her home (approx 60 metres) would prove difficult especially in the dark winter months. This new parking arrangement would also require the developers to cut into the Ancient Woodlands of Paygate Woods. Given that conforming with double yellow parking restrictions appears to be almost optional in Uckfield and that policing of speeding, by an overstretched police force, is probably low on their priorities, we believe that impact on driver behaviour on this stretch will be negligible.

11.4. The Coopers Green/Snatts Road Junctions are similarly dangerous. We have watched large lorries attempting to turn left into Coopers Green Road, having to reverse back onto London Road, and learnt, from conversations with inhabitants of Ringles Cross Cottages, of numerous parked vehicles being damaged or written off. We feel that a major exit/entry point into the proposed development at Mockbeggars will simply exacerbate the dangers of entering and exiting this section of road from Ringles Cross to Budletts Roundabout.

11.5. We are concerned about the safety of crossing London Road, even more so at night, with speeding cars down the hill, often overtaking, or overtaking cars slowing down to turn in to their drives.

11.6. The suggested Coopers Green road changes would have lorries reversing back onto London Road.

11.7. In addition, Snatts Road changes means cars will swing out and across the central line into the path of oncoming traffic.

11.8. Moving the safe bus stop from the current lay-by to the side of the busy London road will introduce visibility problems for cars overtaking the bus as it stops.

11.9. Pavements in North Uckfield are not adequate for wheelchair users travelling to town. There are multiple unsafe areas to cross and cars parked across the pavements. It is also not safe for the visibility impaired and people with other impairments.

## 12. In Conclusion

12.1. It is essential that development and management of change across Wealden is carefully assessed and integrated if true sustainable development fit for 21st century is to be achieved.

12.2. Ad hoc and opportunistic developments in the wrong locations fundamentally conflict with this overriding and urgent strategic objective. Mockbeggars Farm is the wrong development in the wrong place.

12.3. This objective is at the heart of the international government action including the British planning system. The objective goes well beyond the meeting of inherently short-term 5 year housing land requirements. Central government

has already indicated the intention of moving away from slavish housing targets that distort the outcomes of the planning system.

12.4. In this case the proposal quite simply does not represent sustainable development. If this is permitted, then in effect the pursuit of true sustainable development is rendered meaningless. The site is inherently unsuitable for residential use:

- Location – in practice the site is not integrated into existing urban areas; services are not walkable; the site is outside development boundaries; the site will be served principally by the car given the location and the lack of comprehensive and attractive public transport infrastructure. Travel plans do not break the car habit in practice for countryside locations such as this.
- Agricultural use – there is increasing emphasis on the importance of agricultural land and the need for its protection; substantial loss of carbon storage in the greenfield land will result from development.
- Unsustainable and wasteful use of land – the site is being developed at only 16 dwellings per ha (60/3.62) which is a highly wasteful use of greenfield land. Yet to develop more densely would be wholly inappropriate given the countryside location. This demonstrates precisely why higher density development in existing urban areas is inherently more sustainable especially in terms of use of land and harm to the countryside and biodiversity.
- Countryside and Landscape – the site serves as a gap between hamlets and settlements forming an important part of the historic medieval High Weald / Low Weald landscape and Budletts Common, a valued Medieval landscape. The ridge is prominent in the landscape; its development would lead to disjointed urban sprawl merging Uckfield Town with Buxted Parish and with Maresfield Parish. It would also materially impact a significant number of non-designated heritage assets that the developer has persistently ignored.
- Biodiversity – inadequate surveys have been undertaken and, in any event, the adverse impact on identified species will be substantial including on feeding and movement corridors. The fragmentation and isolation of habitats is widely acknowledged to be a continuing existential threat to biodiversity. Further cumulative adverse impacts on Ashdown Forest would arise without realistic and adequate mitigation. Irreplaceable ancient woodland adjoining and nearby will be harmed and deteriorated.
- Infrastructure – there are already major problems with foul water and surface water runoff in the area and there is no evidence that this can be remedied adequately.

12.5. The proposals are contrary to Policies SPO1, SPO7, SPO9, SPO10, SPO13, SPO14, SPO15, GD2, DC17, EN1, EN8, EN12, EN13, EN15, EN17, WCS7, WCS12, WCS14, TR3, TR13.

12.6. The proposal is contrary to the NPPF paragraphs 11, 49, 105, 110, 119, 120, 126, 130, 132, 135, 152, 174, 180.

12.7. In conclusion, the extensive and widespread social, economic and environmental harm which would be caused by the development more than

outweighs the benefit of 60 unsustainable homes. The planning balance lies firmly in favour of refusal of the developer's Appeal. We respectfully request that the Inspector does so.

Yours faithfully

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