



Land at Bird in Eye Farm, Uckfield

Sequential Test Update

For Croudace Homes (South)

Our Experience

With a highly experienced team of chartered engineers, modellers and consultants, RPS has the technical expertise to support clients across all aspects of the flood risk, hydrology and sustainable drainage disciplines. We provide commercial, practical, cost-effective advice and solutions, working closely with clients to meet their objectives.

We have international experience spanning a diverse range of projects, from planning applications for residential, industrial and mixed-use developments, to strategic scale assessments in support of airports, large-scale housing developments, energy facilities and infrastructure projects.

Our clients include developers, investors, architects, planning consultants, Local Authorities and Water Authorities. We also advise and support numerous government agencies with statutory responsibilities for flood risk management.

Services provided include Flood Risk Assessments and sustainable drainage strategies, hydraulic modelling (local and catchment scale), Environmental Statement chapters, drainage modelling, Flood Risk Management Plans and Sequential Test assessments.

On behalf of RPS,

**Chris Patmore,
Technical Director
Hydrology/SuDS
CEnv, MEnvSci, MCIWEM, MCIHT**



1 OVERVIEW OF PROJECT AND SITE BACKGROUND

1.1 Introduction

- 1.1.1 Further to our recent discussions, RPS have been appointed by Croudace Homes (South) Limited (the Client) to review and update GIS analysis carried out as part of the APP/C1435/W/24/3356658 - WD/2024/1799/MAO – Bird in Eye – Planning Application.
- 1.1.2 This technical note aims to serve as an addendum to the RPS Bird in Eye - Sequential Test 2024 draft v3 final document to incorporate changes to the Environment Agency flood mapping in 2025 and the updates to the NPPF in December 2024.
- 1.1.3 This note will provide suitable additional information for assessing the NPPF Sequential Test (ST) to support the outline planning application. It will be carried out in accordance with the approach contained in Section 14 and Annex 3 of the NPPF, as well as the guidance contained in the PPG section title “flood risk and coastal change” and the specific guidance set out in the DEFRA guidance “Flood risk assessment: the sequential test for applicants’
- 1.1.4 In addition, the assessment will have regard to the High Court decision Mead & Redrow v SoS LHC, North Somerset Council and Hertsmere Borough Council and the more recent Appeal decision, Appeal Ref: APP/D0121/W/24/3343144. Land at Rectory Farm (North), Chescombe Road, Yatton BS49 4BZ dated 18th March 2025 which explore further the requirements when undertaking a sequential test.

1.2 Background

- 1.2.1 The sequential test process is based on the National Planning Policy Framework (NPPF). The NPPF was updated December 2024 with the introduction of the ST requirements within paragraphs 174 and 175 (as described below) and supported by the NPPF Planning Practice Guidance [updated August 2022].
- 1.2.2 In January 2025 the Environment Agency (EA) published new mapping for fluvial and surface water flood risk. This new mapping includes an allowance for climate change.
- 1.2.2 On May 25, 2025, the EA also published new national risk information for flooding and coastal erosion including updated “Flood Map for Planning” Flood Zone data.¹
- 1.2.3 Consequently, the Flood Zone data utilised to inform the Sequential Test in 2024 is reviewed within this technical note against the new flood mapping. Because of these updates, the rankings provided by the Sequential Test has also been reviewed.

¹ [Defra Data Services Platform - May 2025 Announcement](#)

2 NPPF Update

- 2.1 The National Planning Policy Framework (NPPF) update modifies the text relating to flood risk and the ST and introduces Paragraph 175 (as described below):

NPPF:

172. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

a) applying the sequential test and then, if necessary, the exception test as set out below;

b) safeguarding land from development that is required, or likely to be required, for current or future flood management;

c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and

d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

174. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.

175. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).

- 2.2 With reference to the Land at Bird in Eye Farm site, the submitted documentation and drawings (including the masterplan as shown below in **Figure 1**), shows that the new mapping does not indicate any significant flood risk to the site (**Figure 2** shows the impact of climate change on the flood risk).
- 2.3 As a result, the masterplan produced is in accordance with Paragraph 175.
- 2.4 The areas within the site are small isolated “low” areas of surface water flood risk.
- 2.5 The new “Flood Map for Planning” is shown in **Figure 3** for fluvial and tidal flood risk and the Flood Zone classification. This mapping shows the site to continue to be outside Flood Zones 2 and 3.

Figure 3: EA Flood Map for Planning – Fluvial (2025 update)

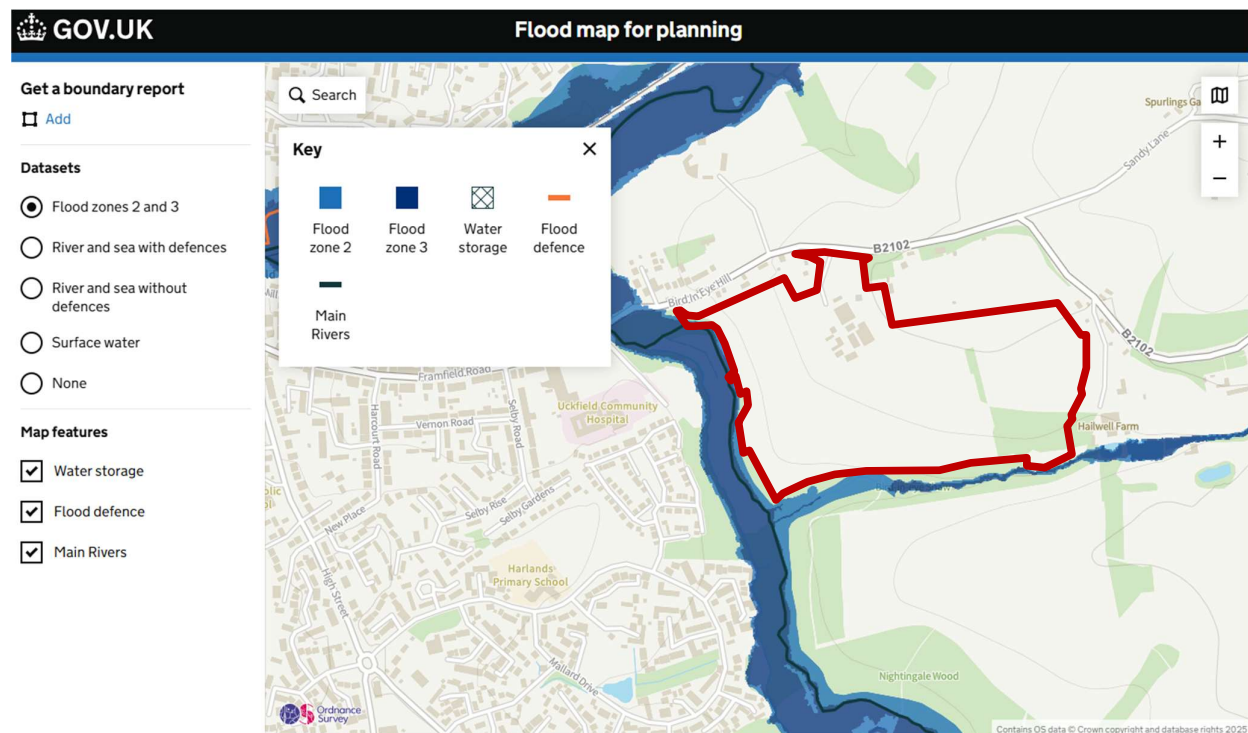
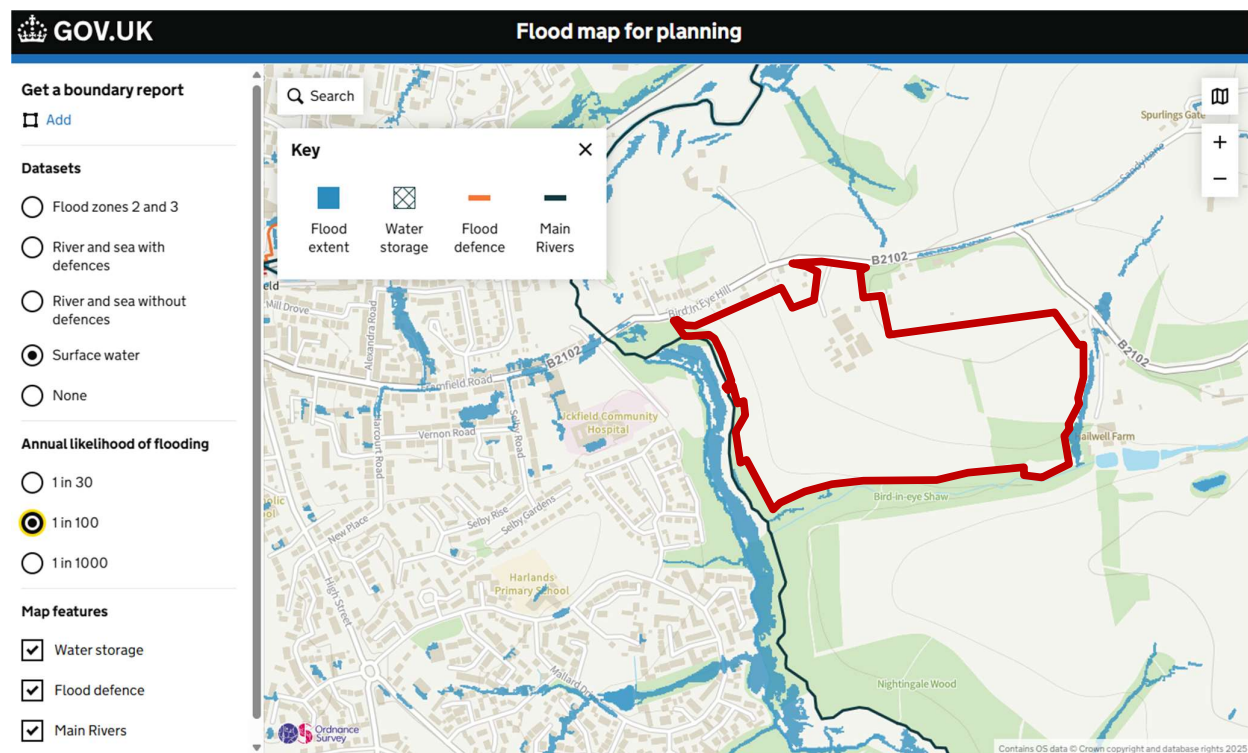


Figure 4: EA Flood Map for Planning – Surface Water (2025 update)



3 ST Updated Results

- 3.1 The site along with all the sites previously tested in 2024, has been compared to the new mapping to assess the hydrological impact on each site and rank them accordingly against flood risk only.
- 3.2 The results of this updated assessment are contained in **Appendix A** referencing the ranking of the sites which overlap with the May 2025 Flood Zones.
- 3.3 Comparing **Appendix A** to the same table provided in the original submitted “*RPS Bird in Eye - Sequential Test 2024 draft v3 final document*” there are insignificant differences in the extents of the Flood Zones meaning that the ranking of the overall list is generally unchanged.
- 3.4 An exception to this pattern is the addition of Sites ID: 10 and 35, these sites were previously identified as being in Flood Zone 1 but are now identified as within Flood Zones 2 or 3.
- 3.5 Because of the minimal changes in Flood Zone extents at the Land at Bird in Eye Farm site and two sites becoming less viable due to significant increases in Flood Zone 2 and 3 extents, the site has improved and is now hydrologically ranked higher without considering any other planning aspects.
- 3.6 The other sites considered within the final shortlist do change flood risk percentages and relative to each other change position in the ranking (see **Table 1** below).
- 3.7 Based on hydrological impacts only, and the site capacity (as described within the original ST report), the Land at Bird in Eye Farm site remains ranked 5th in “*Table 3: Sequential Test sifting – Stage 3 Site flood risk analysis – Percentage of Site within Flood Zone 3 and at Surface Water 1 in 30 year risk*” as shown in the 2024 report prior to the consideration of other planning aspects. The table is reproduced below for reference with the new percentage flood risk.
- 3.8 The four sites with the highest rankings based on hydrological impacts alone remain the same as those identified in the 2024 report. The Land at Bird in Eye Farm site has maintained its 5th rank, and no additional sites have been identified with a higher ranking following the updated assessment.
- 3.9 Appendix D of the original submitted “*RPS Bird in Eye - Sequential Test 2024 draft v3 final document*” has also been reviewed and updated by Woolf Bond Planning in light of the updates to NPPF in December 2024.
- 3.10 **Appendix B** contains the Woolf Bond Planning update documents that concludes:

“It is clear from the above analysis that the four sites identified as being hydrologically sequentially preferable to the Appeal Site (Table 1 of the RPS Sequential Test Update refer) are not sequentially preferable as they are not reasonably available in accordance with the definition of such in the PPG (Paragraph: 028 Reference ID: 7-028-20220825).

The above also evidences that, since the publication of the original ST in July 2024 (CD1.36) there has been no progress on three of the four identified sites.

As we conclude, there are no sequentially preferable sites that have been demonstrated to be reasonably available.”

Table 1: Updated Sequential Test sifting – Stage 3

Site flood risk analysis – Percentage of Site within Flood Zone 3 and at Surface Water 1 in 30 year risk

Sifting Rank (based on FZ3%)	Site ID (see table in Appx A)	Address and SHELAA reference	Indicative Residential Capacity	Gross Area (ha)	% of Site in FZ3	% of Site in SWFR 3.3%
1	2	Land south of Maresfield, A22, Maresfield (212/3120)	150	13.9	0	0.3
2	19	Harrison's, south of London Road, East Hoathly (985/1950)	150	6.7	0	0.4
3	23	Land at White House Farm, London Road, Uckfield (1007/1410)	240	11.3	0	1.2
3	17	Land at Hesmonds Stud, East Hoathly (773/1950)	375	16.5	0	5.2
5	43	Bird in Eye (Application Site)	190	20.1	0.05	0
6	20	Cysleys Farm, Eastbourne Road, Uckfield (028/1410)	145	16.7	0.66	1.3
7	26	Land at Horstedpond Farm, Lewes Road, Uckfield (205/1410)	350	28.8	12.12	2.1

For more information, contact:

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APPENDIX A

Updated RPS ST Table 2025

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APPENDIX B

Woolf Bond Planning - LAND AT BIRD IN EYE FARM, UCKFIELD
SEQUENTIAL TEST: ASSESSMENT UPDATE OF SITES AT LOWER FLOOD RISK
June 2025



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Chartered Town Planning Consultants

APPENDIX B

LAND AT BIRD IN EYE FARM, UCKFILED

SEQUENTIAL TEST: ASSESSMENT UPDATE OF SITES AT LOWER FLOOD RISK

June 2025

1.0. Assessment

Context

- 1.1. This Assessment updates the findings at Appendix D to the original Sequential Test ("ST") prepared by RPS in support of the Appeal Scheme, the content of which is included at **CD1.36**.
- 1.2. Table 3 within **CD1.36** identified four sites with a combined supply of 915 dwellings as being sequentially preferable in hydrological terms only compared to the Appeal Site. The four identified sites are as follows:
 - Harrison's, south of London Road, East Hoathly: 150 Dwellings
 - Land south of Maresfield, A22, Maresfield: 150 Dwellings
 - Land at Hesmonds Stud, East Hoathly: 375 Dwellings
 - Land at White House Farm, London Road, Uckfield: 240 Dwellings
- 1.3. Table 4 within **CD1.36** went on to conclude that these four identified sites aren't deliverable. This conclusion was informed by an assessment of these sites undertaken by Woolf Bond Planning (Appendix D to **CD1.36**).
- 1.4. Since that original assessment was undertaken, a new version of the NPPF was published in December 2024. The Environment Agency also released updated flood risk mapping.
- 1.5. This 'Assessment Update of Sites at Lower Flood Risk' has been prepared against the background of the changes to national planning policy, in particular paragraphs 174 and 175 of the NPPF, the updated Environment Agency flood risk mapping, and the PPG guidance on what is a reasonably available site¹.

¹ Paragraph: 028 Reference ID: 7-028-20220825

- 1.6. Table 1 in the main ST Update prepared by RPS is an update of Table 3 of **CD1.36**. It concludes that the same four sites are sequentially preferable in hydrological terms only.
- 1.7. This 'Assessment Update of Sites at Lower Flood Risk' provides an updated analysis of other matters such as delivery timeframes and planning constraints to determine whether the four identified sites are truly sequentially preferable compared to the Appeal Site.

Site Delivery

- 1.8. Delivery times are calculated using statistics published in Litchfield's Start to Finish Third Edition (2024). Time from validation to first completion is calculated using Figure 3.1 whilst completion of all remaining dwellings is calculated using Table 4.2 therein.
- 1.9. Using Start to Finish has been found to be an acceptable approach to calculating, and sense checking, housing delivery rates on numerous occasions including the Land at Firstwood Lodge², Land at Little Bushey Lane³, Land at Lady Grove⁴, and the Inspector's Report on the Examination of the Mid Sussex Site Allocations Development Plan Document (2022)⁵.

Site Assessments

- 1.10. We have reviewed whether the availability of the 4 x sites listed at paragraph 1.2 above has changed since the original ST at **CD1.36** was prepared. Our analysis is set out below.

Harrison's, south of London Road, East Hoathly: 150 Dwellings (SHELAA Ref: 985/1950)

Live or Permitted Planning Application? – No

Subject to Restrictive Planning Policy Constraints? – No

The Council's SHELAA assessment of this site anticipates the delivery of 75 dwellings within the 1-5 year period, and a further 75 within the 6-10 year timeframe. No reasoning has been given to support the Council's envisioned delivery timeframe.

Applying the findings within Start to Finish, we calculate the following delivery timeframe (if an application were validated today):

- 9 years:
 - o 6 years between validation and completion of 1st dwelling
 - o 3 years to construct remaining 149 dwellings at a rate of 49dpa

We agree with the Council's overall delivery timeframe for this site (should an application be validated today) but question the delivery of the first 75 dwellings within the 1-5 year period.

² PINS Ref: APP/U2235/W/22/3305441 - Paragraph 129 (vi) (Decision Date: 10/03/2023)

³ PINS Ref: APP/N1920/W/23/3314268 - Paragraph 89 (Decision Date: 19/06/2023)

⁴ PINS Ref: APP/Q3115/W/21/3272377 - Footnote 3 to Paragraph 14 (Decision Date: 15/09/2021)

⁵ PINS Ref: PINS/D3830/429/6 - Paragraph 51 (30/05/2022)

In addition, we are not aware of any evidence that a planning application is being prepared for this site.

The site is not deliverable in the timeframe envisioned here (within the next 5 years). As such, it cannot be considered sequentially preferable on this basis.

Land south of Maresfield, A22, Maresfield: 150 Dwellings (SHELAA Ref: 212/3120)

Live or Permitted Planning Application? – No

Subject to Restrictive Planning Policy Constraints?:

- Partially within the Maresfield Conservation Area
- Grade II listed Park Farmhouse, Barn to the West of Park Farmhouse and Oast House to the north west of Park Farmhouse abut the site's northwestern boundary

The Council's assessment in the SHELAA of the site's housing delivery potential indicates that it can facilitate 100 dwellings in the 1-5 year period, with a further 50 delivered in the 6-10 year period. No detailed analysis of how this delivery rate was calculated is included in the site assessment.

If the findings within Start to Finish are applied, we calculate the following delivery timeframe (if an application were validated today):

- 9 years:
 - o 6 years between validation and completion of 1st dwelling
 - o 3 years to construct remaining 149 dwellings at a rate of 49dpa

Whilst our calculated overall delivery timeframe is akin to that of the Council, we question the Council's assertion that this site is capable of delivering 100 dwellings in the 1-5 year period. In addition, we are not aware of any evidence that a planning application is being prepared for this site.

The site is more heavily constrained by the historic environment than the application site and is not deliverable in the timeframe envisioned here (within the next 5 years). As such, **it cannot be considered sequentially preferable on this basis.**

Land at Hesmonds Stud, East Hoathly: 375 Dwellings (SHELAA Ref: 773/1950)

Live or Permitted Planning Application? – Yes: Application WD/2022/0341/MAJ was granted permission on the 18th October 2022 for 205 dwellings. Given the application was granted prior to the monitoring year, this housing is already be catered for in the Council's latest housing land supply position statement⁶ and its delivery does not reduce housing needs in the area.

It is clearly not practical for this site to be re-planned to account for a further 190 dwellings. This is on the basis that some of the dwellings on this site are currently occupied.

⁶ [Wealden District Council Five Year Housing Land Supply Statement as 1st April 2023](#)

For these reasons **it is not considered that this site is sequentially preferable to the Appeal Site.**

Land at White House Farm, London Road, Uckfield: 240 Dwellings (SHELAA Ref: 1007/1410)

Live or Permitted Planning Application? – No

Subject to Restrictive Planning Policy Constraints?:

- Heavily constrained by TPO covered Ancient Woodland

The Council's anticipated delivery within the SHELAA expects to see 100 dwellings delivered within 1-5 years with a further 140 following in the 6-10 year period. Again, no reasoning behind this delivery timeframe has been stated in the SHELAA.

Using Start to Finish as a guide, we calculated the delivery timeframe (if an application were validated today) to be:

- 10.9 years:
 - o 6 years between validation and completion of 1st dwelling
 - o 4.9 years to construct remaining 239 dwellings at a rate of 49dpa

Other matters:

- The title deed for this site confirms that there is no promoter/option agreement in place indicating that there is no short term prospect of an application being brought forward on the land. Thus, the delivery timeframe indicated above is a best-case scenario.

There is no evidence to suggest that this site is being actively promoted for development and is not deliverable in the timeframe envisioned here (within the next 5 years). As such, **it cannot be considered sequentially preferable on this basis.**

Conclusion

- 1.11. It is clear from the above analysis that the four sites identified as being hydrologically sequentially preferable to the Appeal Site (Table 1 of the RPS Sequential Test Update refer) are not sequentially preferable as they are not reasonably available in accordance with the definition of such in the PPG (Paragraph: 028 Reference ID: 7-028-20220825).
- 1.12. The above also evidences that, since the publication of the original ST in July 2024 (**CD1.36**) there has been no progress on three of the four identified sites.
- 1.13. As we conclude, there are no sequentially preferable sites that have been demonstrated to be reasonably available.

Woolf Bond Planning Ltd

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