

CPRE Sussex

Objection to Planning Application Ref. WD/2025/0922/MEA, Land West of Uckfield - Owlsbury Farm for 1,700 dwellings.

This objection is being made on behalf of CPRE Sussex, the countryside charity.

The planning application was submitted in outline with all matters of detail reserved for future consideration save for the access into the site.

PLANNING POLICY CONTEXT

Wealden's Strategic Housing and Economic Land Availability Assessment (SHELAA) (February 2024) included a 'call for sites'.

The land in question, Land at West of Uckfield 4.49 A large strategic site has been submitted to the Council's SHELAA at land at West of Uckfield (SHELAA reference 1061/1410). This site has not been included within the Regulation 18 Draft Local Plan as further detailed testing is required to understand whether this site is suitable for development.

Wealden District Council is preparing a new Local Plan. The emerging Local Plan, which reached regulation 18, does not allocate the proposal site.

The Council supports maintaining the sustainable but productive pastoral landscape of the Low Weald, while expanding and connecting semi-natural habitats to benefit biodiversity, regulating soil and water quality by promoting good agricultural practice, and maintaining the extent and quality of unimproved permanent grassland and meadows.

Wealden District is situated within a diverse and distinctive landscape, including some of the most attractive countryside in the country. The District has one of the greatest concentrations of ancient woodland in the country. Ancient woodlands are home to many rare and threatened species, and they are often described as an irreplaceable resource or considered as 'critical natural capital'. UK BAP priority species are most prevalent in district's designated sites, however, many live outside the boundaries of designated sites.

Paragraph 4.13 of the draft spatial strategy seeks to restrict development in the open countryside to ensure that the character and identity of settlements are maintained and that valued landscapes, countryside and open spaces can continue to provide essential ecosystem and agricultural services. Development boundaries are provided to ensure that development comes forward in the most sustainable locations. Outside of the defined development boundaries, this land will be considered countryside where countryside policies will apply. Proposed development would be contrary to the above.

Policy SS8: Responding to the Climate Crisis Climate change mitigation

j) Support well-connected communities in relation to their location to services, facilities, education, public transport and jobs, supporting a reduction in vehicle use (number and length of journeys) and avoiding car dependent behaviours;

k) Support and deliver the improvement of walking, wheeling and cycling routes, and access to public transport and transport sharing schemes;

o) Achieve improvements in local air quality;

Within the consultation period of the Local Plan, public comments asked the Council to be ambitious in their approach to protecting and enhancing the natural environment and that policies should be supported by a strong evidence base to understand opportunities to support delivery of policies.

Paragraph 6.31 emphasises that protected, priority and notable species including European protected species (bats, hazel dormouse, and great crested newt – with Wealden being within a known stronghold for the latter); species protected under the Wildlife and Countryside Act; Section 41 species; notable birds and other rare species.

Paragraph 6.32 points out that the NPPF makes clear that development resulting in the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional reasons. (Please see objection of the Sussex Ornithological Society).

Paragraph 6.33 reminds us that whilst designated nature conservation sites and priority habitats / species are of significant value, the overall ecological network of habitats and species is important for biodiversity and nature recovery. The fragmentation of habitats and deterioration of the wider ecological network is a threat to biodiversity and nature recovery, particularly in the context of climate change.

Paragraph 6.34 Soil is also a valuable natural resource and is under threat from loss and degradation. The structure and health of soil is important for food production, biodiversity and carbon storage and development should protect and enhance soils from design through to construction. Ancient woodland has undisturbed soils that are a particularly valuable natural asset. Their soil contains much of their ecological value and has many complex ecological interactions. They are susceptible to direct and indirect impacts with potentially long-lasting effects, having taken hundreds of years to develop.

Policy NE9 advises that where development of agricultural land is required, applicants should seek to use areas of poorer quality agricultural land.

Paragraph 6.37 emphasize that compensation should always be a last resort. Following the hierarchy is crucial for all development projects in order to achieve no overall negative impact on biodiversity.

ASHDOWN FOREST Special Protection Area (SPA) and Sp. Conservation Area (SAC)

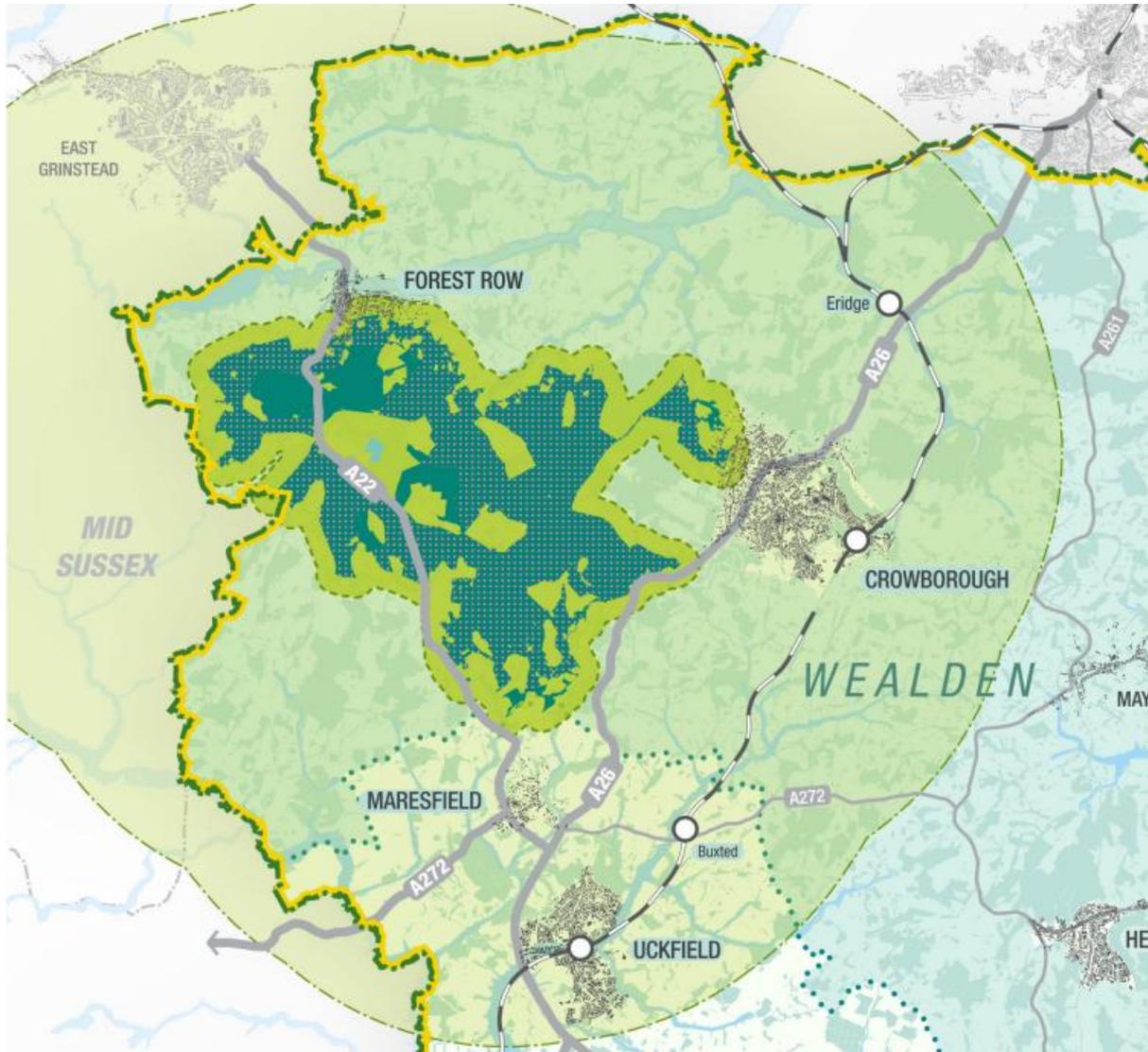


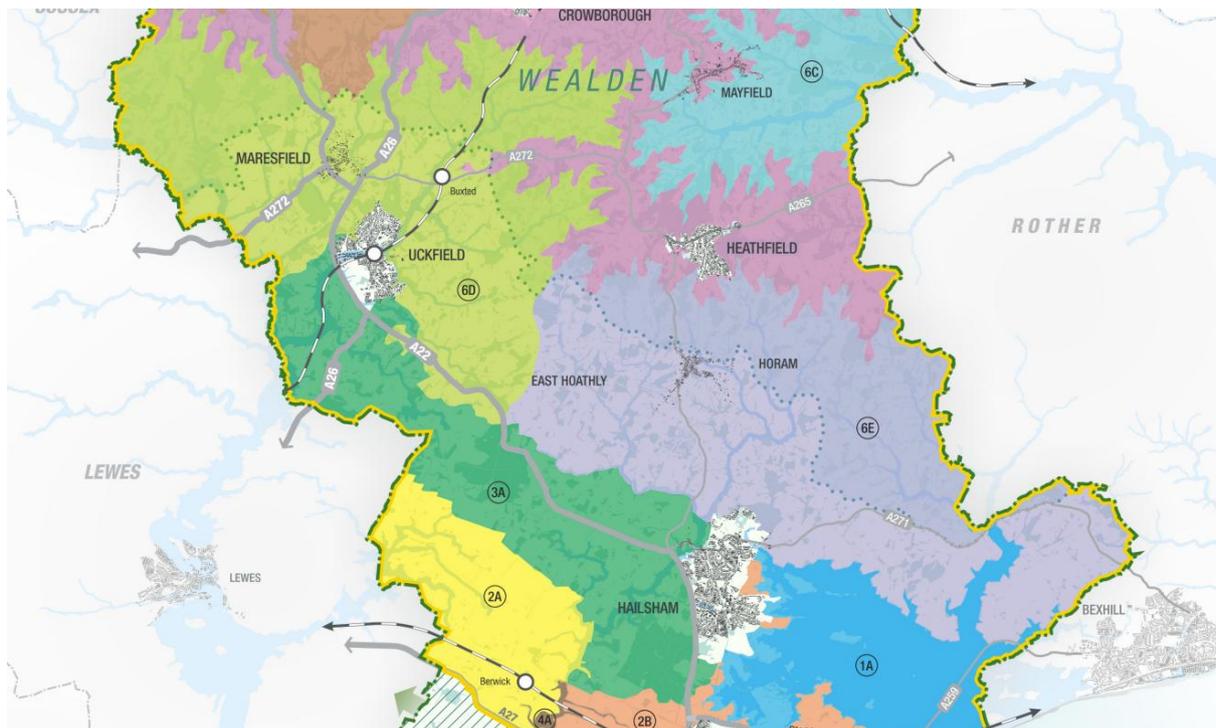
Figure 20 Wealden District Ashdown Forest Zone

Ashdown Forest (SPA and SAC) is one of the largest single continuous blocks of lowland heath, semi-natural woodland, and valley bog in south-east England, and it supports several uncommon plants, a rich invertebrate fauna, and **important populations of heathland and woodland birds**. Ashdown Forest is designated due to the extensive example of European Northern Atlantic wet heaths and dry heath. **Ashdown Forest SPA is designated due its ground nesting breeding bird populations of Dartford warbler and nightjar.**

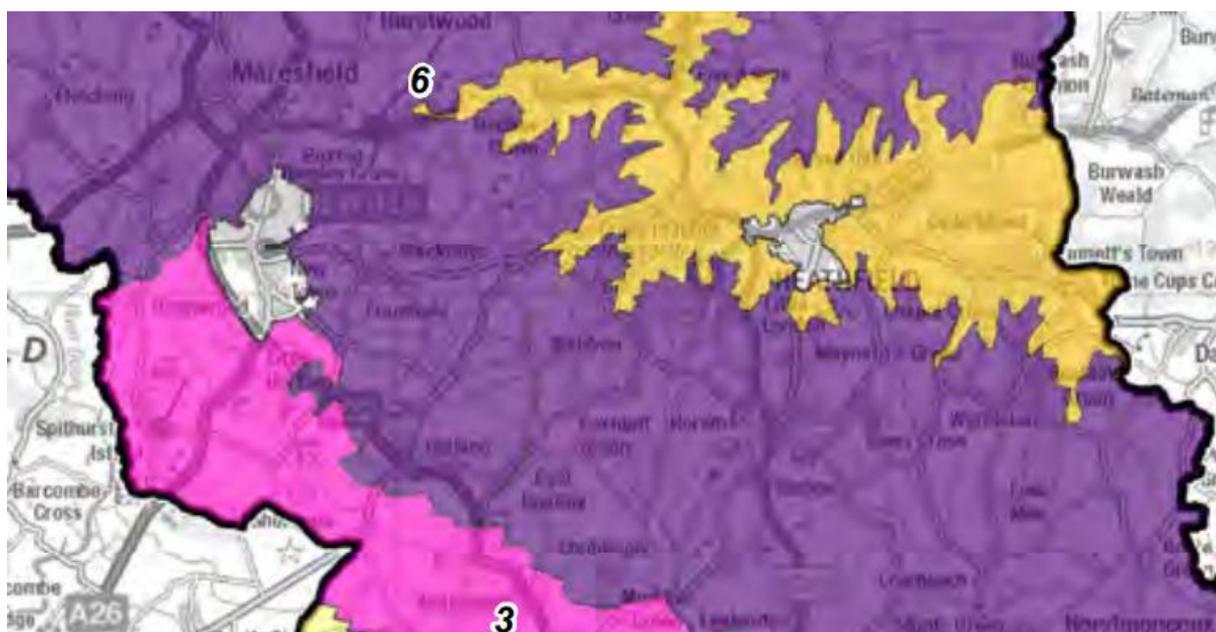
LOW WEALD - National Character Area (NCA)

6.116 The national Landscape Character Assessment (2022) shows that Wealden District falls within three distinct National Landscape Character Areas, including the High Weald, the Low Weald and the Pevensey Levels.

Figure 21 Wealden District Landscape Character Areas



3A Uckfield to Halisham Wooded Clay Vale



National character area NCA 121 Low Weald: a broad, low-lying clay vale which is predominantly agricultural, supporting mainly pastoral farming owing to heavy clay soils, with horticulture and some arable on lighter soils, and has many densely wooded areas with a high proportion of ancient forest.

Landscape Character Type

-  1. Alluvial levels
-  2. Open clay vale (Low Weald)
-  3. Wooded clay vale (Low Weald)

6.165 The effects of poor air quality on ecosystems and their function have been well documented within the scientific literature. The planning system has a role in seeking to improve air quality through actively managing patterns of growth and focusing development on locations which are, or can be made, sustainable through limiting the need to travel and offering a genuine choice of transport modes i.e. walking, cycling and public transport. It also has a role in contributing to and enhancing the natural and local environment by seeking to prevent new and existing development from being put at unacceptable risk from, being adversely affected by or contributing to unacceptable levels of air pollution, and wherever possible, helping to improve local air quality.

THE ADOPTED WEALDEN LOCAL PLAN

The Council has adopted a number of documents that form part of the statutory development plan and this currently consists of the adopted Wealden District Core Strategy Local Plan (February 2013), the ‘saved’ policies of the adopted Wealden Local Plan (1998) and the Affordable Housing Delivery Local Plan (May 2016).

Paragraph 17.4 of the adopted Wealden Local Plan points out at the significant environmental constraints in terms of the outward expansion, particularly intrusive in the open landscape to the south west.

Paragraph 17.6 reminds the objectives to protect the landscape setting of the town and the important countryside gaps between the town and surrounding villages.

Local policy UC1 stresses that within the Uckfield development boundary, as defined on the Proposals Map, new housing development will be permitted on undeveloped land, by infilling, by redevelopment and by conversion of a building to residential use, providing that the proposals conform with all other relevant policies in the Plan.

Paragraph 17.16 (The development boundary for Uckfield) seeks to conserve the rural setting of the town and prevent outward encroachment of development into the attractive surrounding countryside which would be intrusive on the landscape and detrimental to its character. This is what proposal would result in!

Local policy EN2 seeks to maintain the existing settlement pattern and ensure that major new developments generating significant travel movements are located efficiently in relation to existing development and to public transport. Proposal as a major development would be contrary to this policy.

In paragraph 4.48 the Low Weald is described as a very attractive countryside which contains a number of unspoilt villages, historic buildings including moated houses together with a preponderance of vernacular buildings. Away from the main towns and the A22 and A267, it is crossed by a lattice of narrow country lanes which has contributed to a general lack of intrusive or extensive development. Overall, the area retains a strong rural character. This character is evident in the many views across the Low Weald from the higher land to the north and south.

The proposal is against local policy EN8 which assures that development within the Low Weald will only be permitted if it conserves the low rolling agricultural character of the landscape. In considering any proposal, particular regard will be had to:- (1) areas of unspoilt and remote countryside; (2) the setting of settlements; (3) areas on the fringe of adjacent statutorily designated landscapes; (4) the retention of woods, boundary trees and hedges; (5) attractive vernacular buildings and groups of buildings.

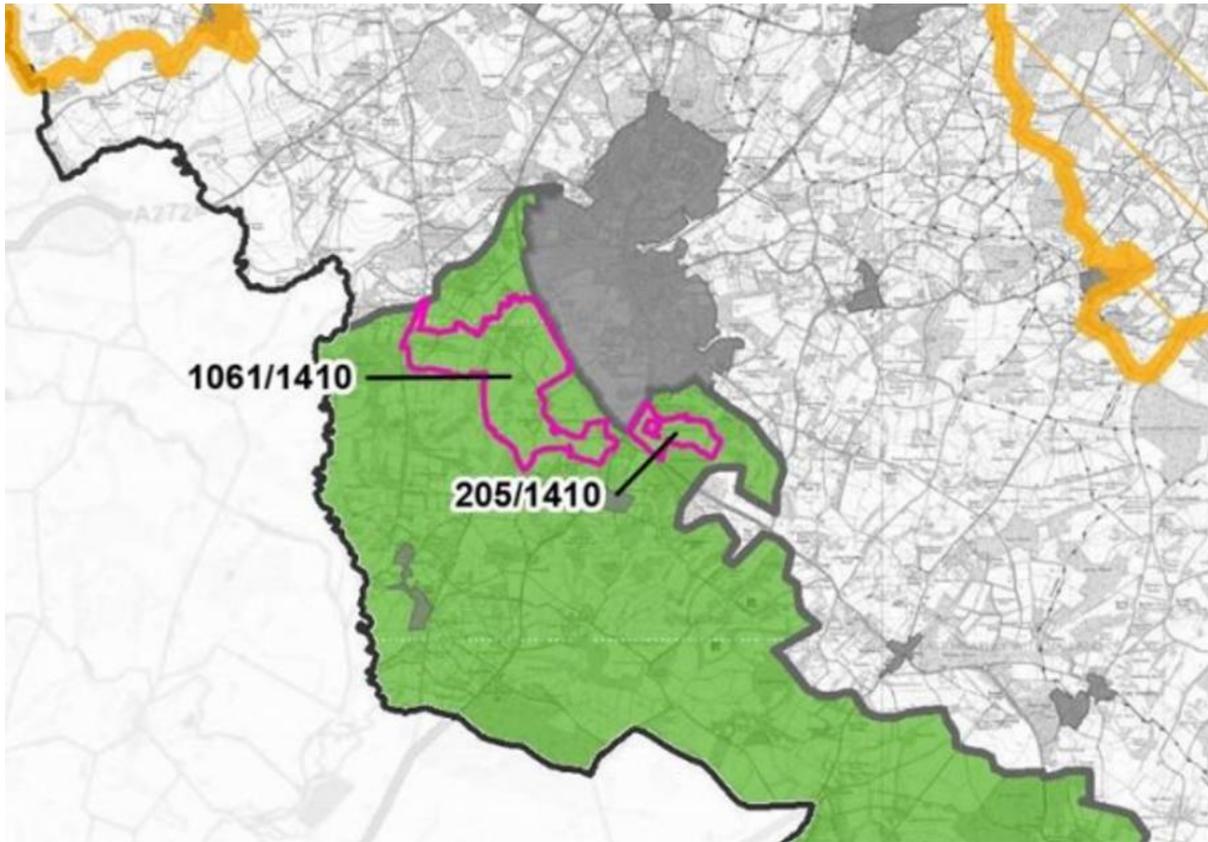
Local policy EN12 seeks to retain and enhance the contribution of trees and woodland areas to the landscape character of the District. The proposed development would fail to satisfy the requirement of this policy.

THE COUNCIL'S Strategic Housing and Economic Land Availability Assessment

Eleven potential development sites (submitted in the SHELAA call for sites process), located on the fringes of 6 settlements, were assessed by LUC, a British environmental consultancy.

Site Assessment: West of Uckfield, Wealden District Council Landscape and Visual Appraisal, New Settlements and Large Urban Extensions. Final report Prepared by LUC November 2023.

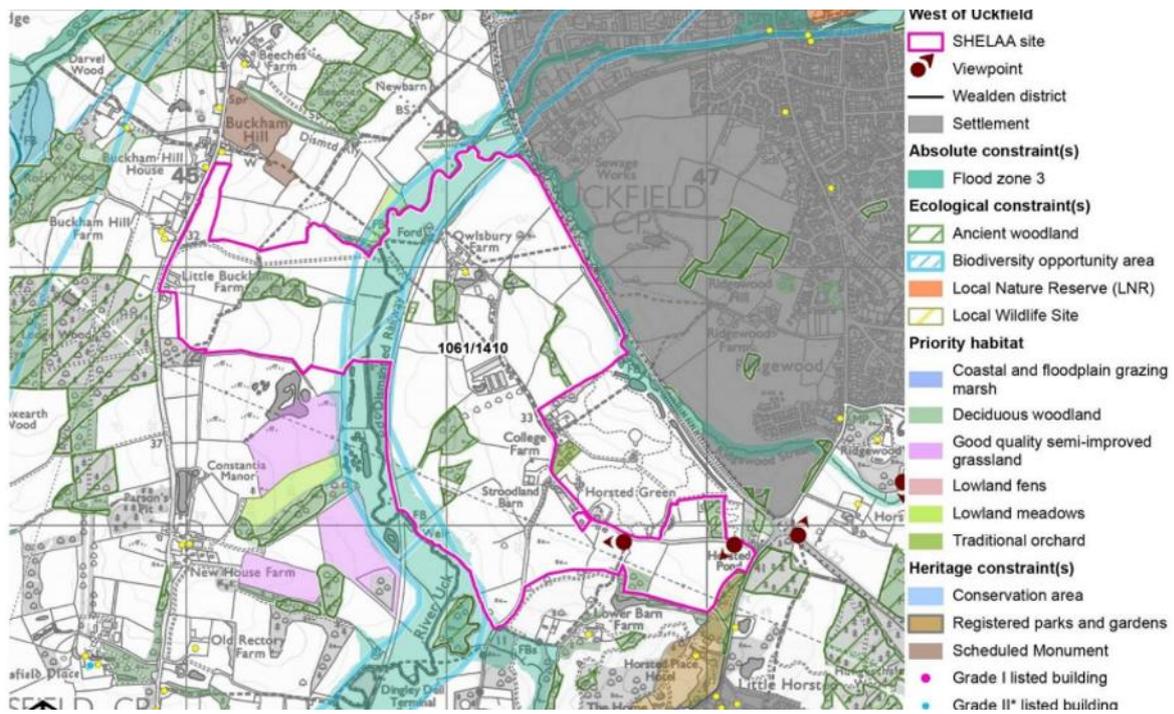
LCA 3A: Uckfield to Hailsham Wooded Clay Vale is a low-lying landscape crossed by the narrow river valleys of the Uck and its tributaries in the west and the Cuckmere in the east. The landscape supports a patchwork of arable and pastoral fields, interspersed with areas of woodland, much of ancient origin, and more extensive mixed plantations. Scattered linear settlements and farmsteads are strung along the rural road network



- SHELAA Site
- Wealden district
- Settlement
- High Weald Area of Outstanding Natural Beauty

- Landscape Character Area**
- 3A. Uckfield to Hailsham Wooded Clay Vale

Land at West of Uckfield 4.49 (SHELAA reference 1061/1410)



The proposal site comprises a patchwork of arable and pastoral fields defined predominantly by mature hedgerows, interspersed with areas of woodland, much of which is ancient. The woodland and hedgerow boundaries provide landscape structure and habitat connectivity to support biodiversity and are a key characteristic of the wider assessment unit.

There are no recorded historic features within the site, apart from a Grade II listed building at Owlsbury Farmhouse. The Horsted Place Registered Park and Garden (Grade II Registered Park and Garden (RPG) is located directly south of the site boundary and the medieval farmstead at Buckham Hill Scheduled Monument is located to the north of the site. The landscape has a more rural character with a sense of tranquillity and dark skies, which is typical of the wider assessment unit, particularly along the Uck Valley and among the numerous woodlands and to the west. There are several blocks of ancient woodland within the site. A number of ancient woodlands also border the site, including The Eyes Plantation to the south-west and Walk Shaw and Round Wood to the south-east. The 'River Uck and its headwaters' Biodiversity Opportunity Area follows the course of the river through the site.

The A22 and riparian woodland along Ridgewood Stream together provide a strong boundary feature between the site and the new settlement edge. The boundary feature formed by the A22 and the rural scenic backdrop to the town formed by the valley sides of the River Uck are key characteristics of the wider assessment unit. The site itself is sparsely settled, with development limited to scattered farmsteads within and immediately adjacent to the site, as well as scattered agricultural cattle barns.

The LSA indicates that the stream corridors and associated riparian woodlands, numerous ancient woodlands, strong network of hedgerows, intact historic field patterns including assarts, rural setting provided to Uckfield, network of public rights of way, rural character and occasional long-distance views to the High Weald AONB increase sensitivity.

Development on the site could affect: ■ The undulating valley landform along the River Uck and Ridgewood Stream, and associated floodplains. ■ The areas of semi-natural ancient woodlands within and immediately adjacent to the site. ■ The network of mature, intact hedgerows. ■ Intact historic field patterns, including assarts and piecemeal enclosure in the north-west of the site. ■ Riparian woodland along the River Uck and Ridgewood Stream. ■ The undeveloped valley sides of the River Uck, which provide a rural setting to the west of Uckfield. ■ The network of public rights of way that traverse the site. ■ Heightened areas of tranquillity and dark skies in western parts of the site, along the Uck Valley and among the numerous woodlands. ■ The Registered Park and Garden at Horsted Place to the south, the Scheduled Monument at Buckham Hill to the north-west and the Grade II listed Owlsbury Farmhouse to the north.

Development on the site would extend the edge of Uckfield further into the countryside and could adversely impact their historic character and rural setting.

Development on the site could affect: ■ The robust boundary provided by the A22 and the wooded course of the Ridgewood Stream. ■ The wider rural setting of Uckfield; expanding development into the open and rural character of the Uck Valley. ■ The historic village at Little Horsted, narrowing the gap between settlements.

Development on the site could affect the visual amenity of: ■ Users of public rights of way within and adjacent to the site. ■ Visitors to Horsted Green Park to the east of the site. ■ Local residents adjacent to the site at Buckham Hill to the north-west and Horsted Green to the south. ■ Residents within the site at Little Buckham Farm, Owlsbury Farm, Dick's Barn and Stroodland Barn. ■ People travelling on roads within and adjacent to the site, including Horsted Pond Lane, the A22 to the east, Station Road to the north-west and the A26 to the south-east.

This site lies in relatively close proximity to strategic site 205/1410 and in combination would result in a general expansion in the size of Uckfield to the west and south-west. There would also be potential for cumulative sequential visual effects experienced by people travelling along public rights of way and the A22, the A26 and Lewes Road. Development of both sites would also cumulatively affect the potential for coalescence between the historic village at Little Horsted and Uckfield.

The summary of assessment: Development of this site would extend development onto the open and steep valley sides of the River Uck to the west of Uckfield, and beyond the distinctive settlement boundary feature formed by the A22 and the wooded course of Framfield Stream.

NPPF

Paragraph 11d)j of the NPPF ensures that the application of policies in this Framework that protect areas or assets of particular importance (footnote 7) provides a strong reason for refusing the development proposed.

Bearing in mind that proposed development is situated outside of the built-up area beyond the Uckfield Bypass, the proposal would be contrary paragraph 84 of the NPPF which requires planning policies and decisions to avoid the development of isolated homes in the countryside.

The proposed development is contrary to paragraph 110 of the NPPF which expects significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

Paragraph 125(b) insists that planning policies and decisions should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.

The proposal is contrary to paragraph 187 of the NPPF which suggests that planning decisions should contribute to and enhance the natural and local environment, protecting and enhancing valued landscapes, sites of biodiversity, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

Paragraph 189 stresses that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. The proposal would not satisfy the requirements of this paragraph.

Paragraph 210 of the NPPF expects local planning authorities to take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) **the desirability of new development making a positive contribution to local character and distinctiveness.**

FINAL THOUGHTS

The proposed development would represent the uncontrolled expansion of Uckfield into the surrounding countryside (urban sprawl), presenting a significant challenge to environmental sustainability and climate goals. The lack of walkable spaces, amenities and public transport system would lead to an increased reliance on personal vehicles which will lead to increased greenhouse gas emissions due to longer commutes and higher vehicle miles travelled. It would also result in habitat loss and fragmentation, impacting biodiversity and ecosystem services.

As mentioned in paragraph 6.107 of the Emerging Local Plan in relation to Ashdown Forest SAC, the European Heaths are sensitive to air pollutants, in particular nitrogen deposition, from an increase in traffic associated with additional development. Therefore, the proposed development would have adverse effects on the integrity of the Ashdown Forest SAC.

This development would sprawl beyond the Uckfield Bypass like an 'appendix' of settlement' whilst a bypass is a road that avoids or "bypasses" a built-up area to let through traffic flow without interference from local traffic. The proposed development would convert the bypass into an ordinary town road, and the bypass may eventually become as congested as the local streets it was intended to avoid. Prospective residents would be imposed to noise and pollution.

It's clear that as the population continues to grow, more housing and development will become a reality. However, understanding the environmental and social consequences of urban sprawl can bring this issue into the spotlight. For many years, urban sprawl was thought to be an exclusively American problem; however, this phenomenon is occurring in the UK despite of the fact that the USA is 40 times bigger than the UK.

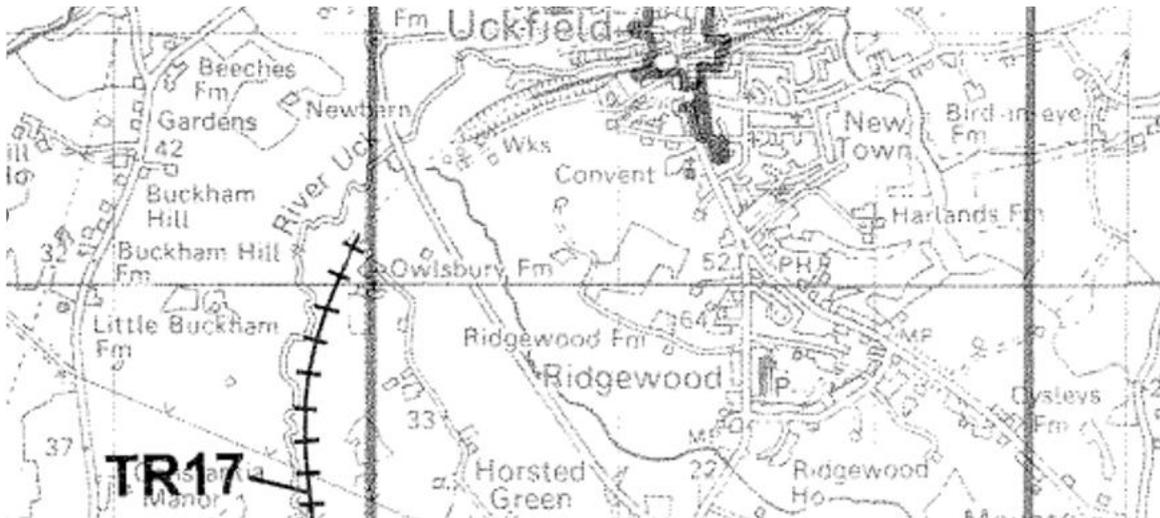
The site is located within the Uck Valley Green Corridor and in a close proximity to Ashdown Forest and proposal would lead to permanent loss of agricultural land.

Proposed development would result in the destruction of wildlife habitat. To make way for human dwellings and their associated infrastructure, natural land would be ploughed under, graded, and paved. Although small areas of wildlife habitat would remain, they may be too small to support all the native species that lived there before or may be widely separated from one another.

Vast areas of impermeable surfaces in built-up areas would replace water-absorbing vegetation and permeable soils. Residential and commercial roofs, roads, and parking spaces greatly impede the absorption of water into the soil. Rainwater run off these surfaces and may quickly pool in areas of low elevation, increasing the risk of local flooding. Chemicals present on the pavement and roadway at the time of rain would be carried with runoff as water pollution, reducing water quality and threatening aquatic ecosystems downstream.

RE-ESTABLISHMENT OF RAIL LINE BETWEEN LEWES AND UCKFIELD

The Council would support any future opportunities to electrify the rail line, and longer-term plans to re-establish a rail line between Lewes and Uckfield and build a new rail link between Uckfield and Brighton via Falmer (the Emerging Local Plan), however, the proposed development would cross the former railway line.



Adopted Wealden Local Plan: Proposal Map

+++++ Safeguarded route of former Uckfield
to Lewes railway

RESPONSE OF THE SUSSEX ORNITHOLOGICAL SOCIETY

The Sussex Ornithological Society (SOS) opposes this development stating that by virtue of its bird life alone, the site easily meets the criteria for a Local Wildlife Site. If approved, bird species certain to be targeted for recovery by the East Sussex Local Nature Recovery Strategy would be adversely affected. They recommend that local authorities collaborate to safeguard the rural landscape west of the A22 in the Uckfield area as far as Burgess Hill.

As demonstrated by the documents supplied with the application, the site is ecologically rich in birds and other fauna and flora. The bird distribution maps in the Ecological Assessment documents are, unfortunately, not clear in the public versions, but the document as a whole is sufficient to confirm that there are high numbers present in a significantly high diversity of species which will be adversely affected by the proposed development. This is supported by the Society's own field work and records. The Assessment summarises the breeding species as:

11 Red-listed species of Conservation Concern

16 Amber listed species of Conservation Concern

11 listed under Section 41 of the Natural Environment and Rural Communities Act (protected species) listed under Schedule 1 of the Wildlife and Countryside Act (as amended).

If birds recorded in all the surveys are included (breeding and winter), then 14 species are Red-listed and 24 Amber-listed.

The effect of the proposed development on farmland birds is of great concern, due to their declining numbers nationally. Numbers have declined in Sussex over the past 30 years and it is unacceptable that further habitat should be destroyed.

Paragraph 1.10 stresses the purpose of the planning system to contribute to sustainable development. This can be summarised as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'.

Climate change and biodiversity are interdependent; climate change can contribute to biodiversity loss, and biodiversity loss can make climate change and its effects worse. Our aim is to ensure that future generations will meet their own need whilst enjoying the ancient woodlands and an intricate rolling landscape of Low Weald.

The proposed development due to its location is entirely against adopted Local Plan as a whole, the Emerging Local Plan and relevant paragraphs of the NPPF.

CONCLUSION

CPRE Sussex objects to the planning application for the above reasons. This application should be withdrawn or planning permission should be refused.