

Buxted Parish Council – formal response to Wealden District Council Local Plan phase of consultation (“Regulation 18”)

Policy SA1: Housing and Mixed-Use Site Allocations

Suitability of sites in Buxted:

BU4 – Lower Totease Farm, Framfield Road, Buxted

Local concern is raised regarding the suitability of this site including, loss of employment opportunities; unsuitable access onto Framfield Road as the visibility is restricted, so ten more houses would exacerbate this problem; increased traffic; ten houses is too many.

However, should this site be deemed to be suitable for development, the Parish Council would suggest that development should be extended to Land South of Lower Totease Farm (SHELAA ref 042/1840). The reason given for this being an unsuitable site is due to the existing vehicular access to the site having inadequate visibility onto Framfield Road, yet BU4 uses the same access and is considered acceptable.

The Land South of Lower Totease Farm also includes a border with ancient woodland. The land could be developed but cut off prior to the ancient woodland preserving a nature reserve, or the land closest to the ancient woodland be used as a green burial site (as there are none allocated within the local plan).

The Parish Council owns half of the access track which is the principal issue for both development sites. The Council would be open to dialogue with WDC to opening the access track to a double width (removing the centre line of hedgerow and some trees) to widen the access for both new development and the existing recreation ground. See additional information/comments A1.

BU6 – Land east of Great Totease Farm, Church Road, Buxted

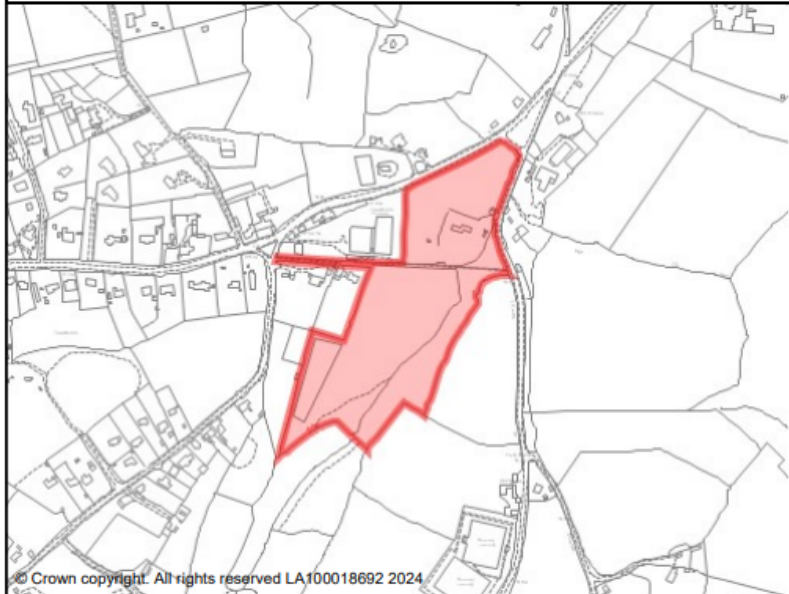
This site could be extended further to the north if the land is available. The Parish Council agree that the site must only be accessed via Iron Plat Lane and not via Church Road which is in poor condition and often congested with parked cars.

BU7 – Land at Holly Farm, Station Road, Buxted

The Parish Council deem this site **unsuitable** for development due to its visibility from Buxted Park. Part of the site is higher than Buxted Park and thus the sites would be intervisible.

Why does the SHELAA (ref744/1840) shows both fields from the railway site down to Binky’s Farm and consider they are both suitable for development but site BU7 only includes the field closest to Binkys Farm. Why? This creates a disjointed stand-alone development outside of Buxted. Why is this site considered suitable when another in Pound Green considered too far into the countryside (191/1840 unsuitable site summary). However, some development maybe possible if the following were to be taken into consideration: See comment/information A2.

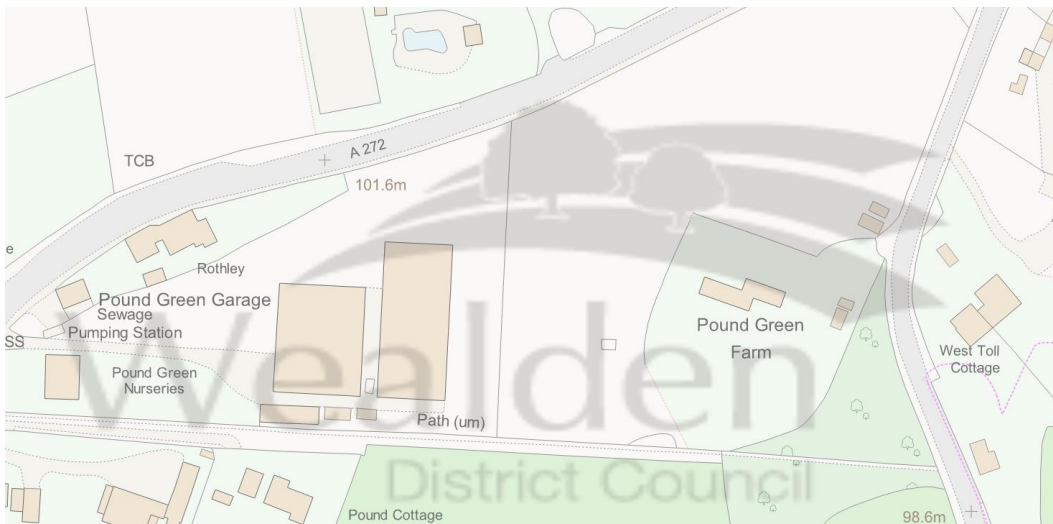
Wealden SHELAA Unsuitable Sites Summary

Plan showing whole extent of submitted site	Site Reference: 191/1840
	Settlement: Buxted
	Parish: Buxted
	Address: Land to east of Buxted, Pound Green, Buxted
	Suitable for housing?: No Suitable for employment: No Site available: Yes Site achievable: Yes Site Conclusion: Not suitable
	Site area (ha) Gross: 4.40 Site area (ha) Net: 0

Reasons: The site consists of a dwelling, garden and woodland located on the eastern fringe of Buxted. The site is in a relatively rural location and is therefore remote from services, amenities and public transport that are provided on the other side of Buxted village. Ancient woodland is present within the eastern portion of the site and would reduce the developable area considerably. The 2023 Landscape Sensitivity Assessment states that the site landscape is moderately sensitive to new development due to the assart fieldscape and the priority habitats (ancient woodland) including in the southeast boundary of the site. In order to access this site, a significantly improved vehicular access and pedestrian access would be required, which is also likely to involve a remodelled Limes Lane/A272 junction. The southern part of the site is rural and unrelated to existing development in the area and development would significantly intrude into the countryside. There are small pylons on the site that may need to be re-routed or put underground. A public right of way crosses the centre of the site from east to west connecting to Pounds Green Lane.

Why is this land not considered suitable when BU7 is considered acceptable further outside of any other development and a stand-alone piece of land? Why is this considered more remote from services and more in the countryside. The western boundary abuts the development at the former site of Pound Green Nurseries WD2023-2534 and cancels out WDC’s arguments in the above paragraph.

The parish council would also query the location of the development boundary along the west side of the village at Pound Green. It would seem odd as there are a number of houses outside of the boundary without any obviously logical reason. This in contrast to the east side of the village where the development boundary has been stretched past the obvious line to include a development site (land at Holly Farm) that is isolated with no coalescence to the village.



Suitability of sites in Five Ashdown and Ringles Cross:

BU1, BU2 and BU3 – all three sites are considered **unsuitable** for development. Approval of the Mockbeggars site on appeal should be considered enough development for Coopers Green. These sites should be considered for a green burial site. With the possible exception of BU1 due to flooding issues

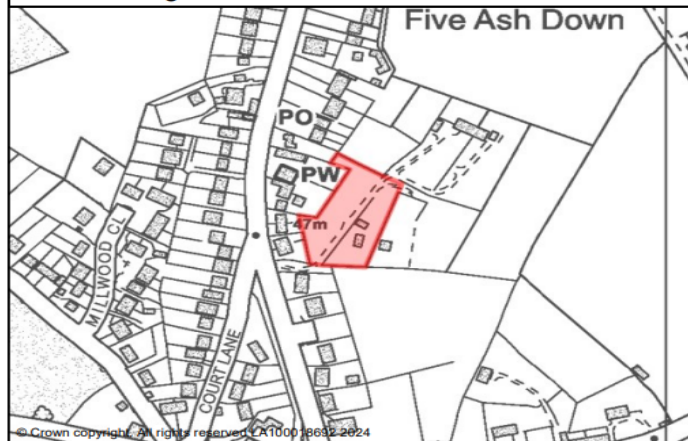
BU1 – Land east of Coopers Green Road, Ringles Cross – unsuitable for development. Sewage site is located on this land, and it floods. Why is there an allocated for twenty dwellings in a much smaller site when the adjoining BU2 has been allocated fifteen dwellings. The site also abuts Buxted Park and Gardens and ancient woodland.

BU2 – Land opposite the Croft, Coopers Green Road, Ringles Cross – unsuitable for development – too much development for Coopers Green given Mockbeggars approval. The site also abuts Buxted Park and Gardens and ancient woodland.

BU3 – Land opposite Roundwood, Coopers Green Road, Ringles Cross – unsuitable for development. Too much development given Mockbeggars approval. The site abuts Buxted Park and Gardens and ancient woodland.

BU5 – Land at Walled Garden, Five Ash Down – The Parish Council are not opposed to a sympathetically designed development on this site, but twenty dwellings are considered an overdevelopment adjacent to a listed building. Any new development should be low density matching existing fronting the site. The Council does question why this site has now been included as suitable following the refusal for housing and dismissal at appeal.

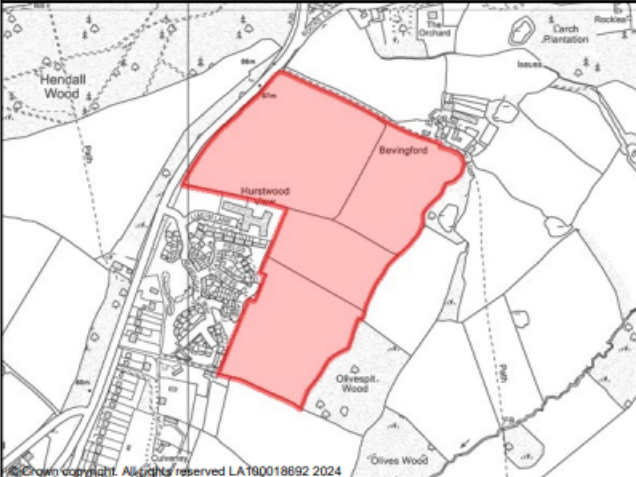
Wealden SHELAA Unsuitable Sites Summary

<p>Plan showing whole extent of submitted site</p> 	<p>Site Reference: 045/1990</p> <p>Settlement: Five Ash Down</p> <p>Parish: Buxted</p> <p>Address: Land at Belfort House, Five Ash Down</p> <p>Suitable for housing?: No Suitable for employment: No Site available: Yes Site achievable: Yes Site Conclusion: Not suitable</p> <p>Site area (ha) Gross: 0.49 Site area (ha) Net: 0</p>
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Reasons: The site comprises of a residential dwelling, garden and paddock located to the east of Five Ash Down (road). The 2023 Landscape Sensitivity Assessment has indicated that the site is of low to moderate sensitivity owing to the existing development on site and modern residential development to the west of the site along Five Ash Down, which detracts from the rural character of the immediate area. The site is well enclosed, and development should not have an adverse effect on the wider landscape from which it is well screened. However, the current vehicular access from Five Ash Down (road) is not considered suitable to serve further residential development of this nature. A new vehicular access would need to be established from the submitted SHELAA site (reference 058/1990) to the south, if this was to come for with new development. The site as submitted does not have appropriate vehicular and pedestrian access without the use of third-party land. The site is therefore considered unsuitable, as the existing vehicular access could not serve residential development of this nature.

Why has this site not been included? It is stated as a low impact site with no adverse effect on the wider landscape. It states the that the existing vehicular access is unsuitable, however the adjacent Walled Garden is allocated for development, therefore can the access not be arranged through this site?

Wealden SHELAA Unsuitable Sites Summary

Plan showing whole extent of submitted site	Site Reference: 1199/1990
	Settlement: Five Ash Down
	Parish: Buxted
	Address: Land east of Five Ash Down Road, Five Ash Down
	Suitable for housing?: No Suitable for employment: No Site available: Yes Site achievable: Yes Site Conclusion: Not suitable
	Site area (ha) Gross: 17.36 Site area (ha) Net: 0

Reasons: The site is comprised of four large agricultural fields located on the northern outskirts of Five Ash Down and to the east of the A26. There is a recently completed, modern residential development to the north of Five Ash Down (under planning reference WD/2007/1075) on the former Grampian Country Food Group Factory site (a brownfield site) to the east of the A26, which this site wraps round to the east and north of. The site is situated within a prominent location within the wider landscape and panoramic views are provided across the surrounding countryside to the north and east. The site would also be of a significant scale (particularly when coupled with the recently completed residential site to the west) and would be at odds with the largely linear settlement pattern of Five Ash Down. It is considered that housing development would be unsuitable and out of keeping with the semi-rural character and appearance of the countryside in this location. In addition, the site may have difficulty in terms of achieving a suitable vehicular access, given the speed of the road (50 mph speed limit), the bend of the A26 and the undulating topography as it moves northwards, which may also affect visibility splays. Ancient woodland bounds the south-eastern and north-eastern boundaries of the site. A public right of way runs east to west along the site's northern boundary. Two Grade II listed buildings (Bevingford and barn to west of Bevingford) lie adjacent the sites northeastern boundary, which would be a limiting factor in terms of development on that part of the site.

This site could be made smaller to consist of the square of land to the north of the Ashdown Place development. Access could be through the north of the Ashdown Place site to avoid a new access onto the A26.

Suitability of sites, north Uckfield, and Ashdown Business Park

UCK11 – Land at White House Farm, London Road, Uckfield – This site is outside of any development boundary isolated and would create a ghetto, self-contained nowhere near another settlement. The land is sensitive due to its location near Budletts and will have a negative ecological impact and be an overdevelopment if the land. This is close to the sensitive site of Budletts Common which was described in a document 'Land North of Uckfield,' pages 4-7 attached. WDC are aware of this document.

Policy SS1: Spatial Strategy for Wealden

Development boundaries

2. Subject to other policies in the plan, new development will be permitted within those settlements with an identified development boundary as shown on the Policies Map. This includes the following settlements:

Crowborough, Uckfield, Hailsham, Heathfield, Polegate, Willingdon, Stone Cross, Westham, Pevensey, Pevensey Bay, Forest Row, Horam, Mayfield, Wadhurst, Bells Yew Green, Berwick Station, Blackboys, Buxted, Cross in Hand, East Hoathly, Five Ash Down, Framfield, Frant, Groombridge, Hartfield, Herstmonceux, Isfield, Lower Horsebridge, Maresfield, Ninfield and Rotherfield.

a. Do you agree - no

b. This strategy will destroy north Wealden, there is little or no empathy with this historic landscape. Development should be focussed in those areas that already have the infrastructure and, in the past, targeted for development and possibly that landscape has already been destroyed. Wealden should look again at small infill development within the High Weald area.

c. Over reliance on past assessment has taken place, with North Uckfield not being correctly assessed and the transition between two areas, the High Weald and Low Weald are not necessarily correct and are subtle. If such importance is to be placed on the HW AONB, at its southern boundaries with Uckfield and Buxted it should be redrawn, or at the very least, a 'transition buffer' be considered with future development.

d. In Buxted the development boundary to the east does not make much sense, sometimes infilling adjacent to the A272 is allowed then across in another area disallowed. Sporadic 'standalone' settlements have been put forward in the SHELLA process which makes no sense of development boundaries. Whatever happened to the principle of not allowing coalescence? Ringles Cross and Five Ash Down are in danger of becoming a strip development, joining up south to Uckfield and finally east to Buxted. The development boundary in the north of Uckfield could be drawn at Snatts Road to protect those settlements to the north. Budletts should be a protected landscape.

Policy SS6 Strategic Employment Allocations

Question 9 Do you have any comments at this stage in relation to the site at Ashdown Business Park, Maresfield?

Buxted Parish Council object to an extension of Ashdown Business Park to the equivalent of 96 football pitches. It is understood that this would provide a lot of employment opportunities, but an extension of this site in this location is unwarranted.

It is situated 3km from Ashdown Forest surrounded by protected habitats and ancient woodland. An expansion of this size would have a detrimental impact on the sensitive landscape and natural environment.

Of great concern to Buxted Parish Council is the inevitable impact such a development would have on the road system specifically the poorly maintained A272. It cannot be expected that visitors to the site would only use the A26. This will add an increased burden on the substandard road system creating thousands more traffic movements through the village of Buxted to access the A267.

Whilst we do not wish to repeat, ad verbatim, we fully endorse those concerns voiced by Fletching Parish Council and SABRE.

The site would be better placed in the south of the district where vast investment has taken place to improve the road links from Eastbourne to Polegate via the A27.

Policy INF1: Infrastructure provision, delivery, and funding

1. New development will be required to consider the capacity of existing infrastructure and consider whether new or improved infrastructure will be required to support development. All types of infrastructure should be considered including whether the scale and location of existing infrastructure, services and facilities would be able to support the development proposal. Early engagement with infrastructure providers is expected – **STRONGLY AGREE**
2. Planning permission will only be granted where it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all necessary infrastructure requirements arising from the proposal – **STRONGLY AGREE**
3. The timing of infrastructure provision will need to be considered and agreed with the Council in liaison with infrastructure providers to ensure that infrastructure is delivered and is operational prior to, or alongside the development it is required to serve. For larger applications, the phasing of development may be appropriate. Where this is the case, the Council will use conditions or planning obligations to secure the phasing arrangement to ensure that infrastructure is delivered at the right phase/time – **AGREE.**
4. The delivery of relevant infrastructure will be secured either through direct provision by the developer or financial contributions, such as CIL and / or S106. Contributions towards infrastructure maintenance will also be secured as relevant – **STRONGLY AGREE.**
5. The provision of infrastructure facilities such as those relating to healthcare and education should be provided in locations that relate well to both existing and new development. They should also be in areas well served by existing or new/enhanced public transport services and walking, wheeling, and cycling routes. Infrastructure must be designed in a way to ensure accessibility for all - **AGREE.**

Viability

6. Where relevant, a clawback mechanism will be incorporated into any legal agreement to ensure that infrastructure can be provided should viability as set out in viability assessments be better than originally anticipated – **AGREE.**
7. If full mitigation measures and contributions are not able to be delivered due to viability, the development will only be permitted where the benefits of the development outweigh the lack of full mitigation for its impacts, having regard to other material considerations – **DISAGREE - IF FULL MITIGATION MEASURES AND CONTRUBUTIONS ARE NOT ABLE TO BE DELIVERED THE SITE SHOULD THEREFORE BE EXCLUDED FROM BEING CONSIDERED SUITABLE FOR DEVELOPMENT. Why have the policies laid out in the Local Plan if they are then disregarded, also, more weight should be given to the LUC Wealden Landscape Character Assessment May2023.**
8. In considering the importance of infrastructure and its role in creating and supporting sustainable communities, viability reasons for non-delivery will only be considered in exceptional circumstances. To demonstrate viability constraints the developer must provide a satisfactory viability assessment (open book) prior to the validation of the planning application in accordance with the terms agreed by the local planning authority. All costs associated with the development will be required to be clearly set out by the developer including any costs that were not anticipated. The assessment will be required to demonstrate how the value of planning obligations have been maximised alongside likely viability. The Council will use an independent consultant to verify the assessment and the costs associated with this will be funded by the developer. All viability assessments will be made publicly available – **SEE ANSWER ABOVE.**

Policy INF4: Utilities

Utilities

1. All development proposals should demonstrate that the infrastructure capacity for surface water disposal, water supply, wastewater treatment, gas, electricity, and oil will be sufficient to meet the forecast demands arising from the development over its lifetime and that appropriate connections can be made to the development created – **STRONGLY AGREE**
2. All development proposals should ensure that the layout of the utilities is planned to allow future access to existing water supply, wastewater, gas, electricity and other utilities infrastructure for maintenance and upsizing/upgrading purposes – **STRONGLY AGREE**
3. The utility network should be protected and development proposals that would compromise existing utilities infrastructure, or encroach on future connections for utilities, will be refused. Opportunities should be sought to safeguard the provision of utilities wherever possible – **STRONGLY AGREE**
4. The Council will work with its utilities partners to ensure the necessary physical and environmental infrastructure is provided to support communities. Development that supports or provides carbon neutral utilities schemes that contributes to helping the Council meet its carbon neutral target will be particularly supported - **AGREE**.
5. Lastly, new development proposals must take into account the impact of overhead power lines on site and should wherever feasible, aim to provide power cables underground in order to protect residential amenity – **AGREE**.

Policy INF5: Safeguarding of Infrastructure

As defined on the Policies Map, development will not be permitted which would prejudice the reinstatement of the following railway lines:

- a) Lewes to Uckfield; - **STRONGLY AGREE**

Policy INF7: Local services and Community Facilities

New and Additional Provision

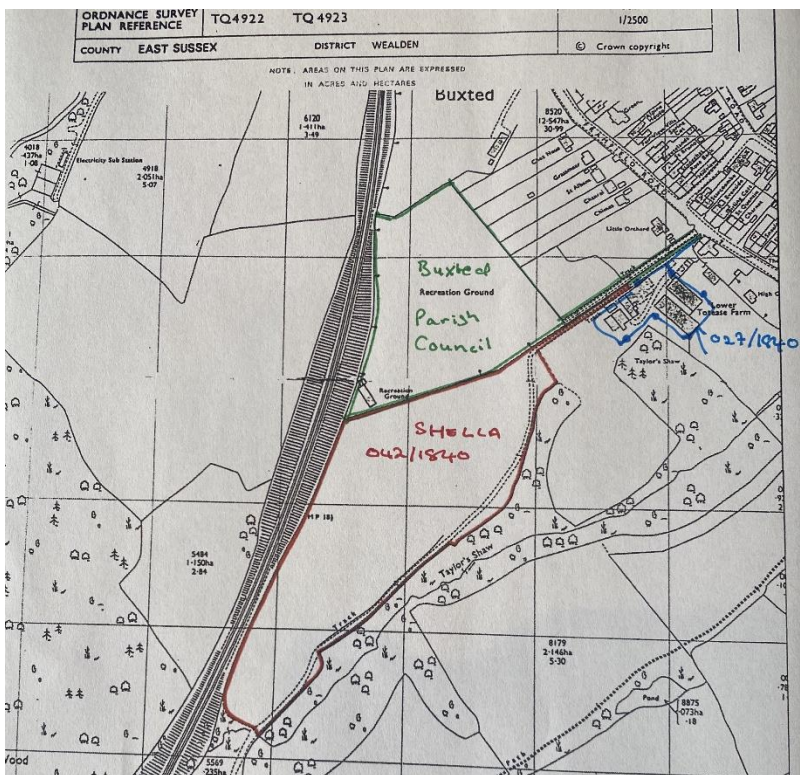
1. Development proposals for the provision of new or improved local services and community facilities will be supported - **STRONGLY AGREE**
2. The Council will work with developers and relevant organisations to ensure that appropriate local services and community facilities, including new provision and enhancements to existing facilities, or shared provision of facilities are provided in the most appropriate locations to facilitate the needs of development as well as those of existing communities – **STRONGLY AGREE**
3. Development of new community facilities should:
 - a) Be located within development boundaries, unless it can be demonstrated that the proposed location is the only suitable option and is well-related to the community it will serve - **AGREE**
 - b) Be of an appropriate scale and intensity of use, without negatively impacting upon adjoining or nearby uses or the vitality or viability of existing facilities in the area; - **AGREE**
 - c) Be accessible to the community it serves by public transport, walking, wheeling, or cycling – **AGREE**.

In addition, these following points are being raised by Buxted Parish Council which have not been addressed in the proposed Local Plan:

In the previous local plan, the need for a new village hall in Buxted was considered necessary. This was taken forward by the local community and Buxted Parish Council. However, an increased size to that of the then current Reading Rooms was refused by Wealden as they were just beginning to implement the 7km Ashdown Forest policy. This was the beginning of a lack of interest from local people. Today, with increasing local population, Buxted not only needs a new hall, with sufficient parking (not possible of current site which has planning permission). One proposal might be to combine the site of the recreation land in Buxted with sites put forward in the SHELAA process, one accepted, one turned down, but both with the same access.

See A1 at start of this document for further information:

However, should this site be deemed to be suitable for development, the Parish Council would suggest that development should be extended to Land South of Lower Totease Farm (SHELAA ref 042/1840).



However, we wish to see the need for a new village hall within the environs of Buxted included in the local plan.

In addition, we note that there appears to be no provision for a Green Burial Site in the local plan. The current burial site at Little London is small and subject to water ingress and may not be deemed viable for long term use. In this document we have suggested that site put forward for development, within Buxted, might be suitable candidates for burial sites, BU2 & 3 (page 3).

We strongly feel that Wealden should address this issue of the lack of alternative to the Wealden Crematorium, coupled with an overall lack of space in conventional burial grounds and an alternative to that of associated religious beliefs. Not to mention a greener policy than using a crematorium.

Question 24 draft policy NE3 Woodland trees and Hedgerows

Carefully check trees on neighbouring properties that the developer has omitted on their plans, because 'he could not gain access'. Even though they may be clearly visible from a distance. Provide a minimum buffer and prevent destruction of trees prior to planning applications being submitted or refusing them for 'wilful damage'. Same would go for hedgerows.

Question 25 draft policy NE4 Ancient Woodlands.

- a. Agree
- b. Yes, but can depend on quality of ancient woodland.
- c. Yes, because the ancient woodland did extend beyond the now boundary, perhaps greater reliance on map regression should be used? Some ground flora may be still present.
- d. Agree, there are some very small pockets of ancient woodland, where benefits of development outweigh the harm and it does depend on size of development and possible harm done by greater footfall or proximity of development.

Question 26 draft policy Ashdown Forest SPA

- a. Agree
- b. No mention has been made of dualling the A22 across the Forest does WDC have an opinion on this? Any buffer zone proposed would we made null and void by pursuing this upgrade.

Question 27 draft policy NE6 Landscape Character

- a. Agree so long as it is adhered to, recent decisions have said benefit outweighs harm.
- b. Also beware that where a development falls within, or near to two different Character areas the policy often fails. Past studies have failed to map certain areas, often through ignorance, so new studies are need in: Geology, Hydrology, Biodiversity, possible Nature Reserves etc. LUC Wealden Landscape Character Assessment May 2022 should be taken into account and studied for any shortfall. ***Perhaps Landscape Character Assessment is one of the most important aspects to be taken into account when planning developments in North Wealden.***
- c. As above the boundaries between different character areas often need more intensive consideration.
- d. Yes, redefining the boundary of the High Weald ANOB with its boundaries in and around North Uckfield and parts of Buxted.

Question 28 draft policy NE7 The High Weald National Landscape

- a. Agree
- b. Carefully consider where infill development might be appropriate with the settlements of the landscape.

Question 36 draft policy HE1 Historic Environment

- a. Agree
- b. Agree broadly but sometimes, if buildings are inserted into a Heritage setting, they could be made to look very different to make clear the distinction between 'modern pastiche of an older style' and something obviously contemporary. We cannot be set in the past and build something that could be celebrated in the future.
- c. What is missed? That which has been previously unrecorded just because it is 'not know. Does not mean it does not need conserving. Perhaps the policy could reflect that. It does not mean it has not been recorded in the Heritage Environment Records, it is of no value. It must be borne in mind that the HER are not foolproof.

Question 37 draft policy HE2 Heritage Assets

- a. Agree broadly.
- b. Setting is extremely and should be given high priority, as often an area in which a development may be proposed is unremarkable but the effect on setting is tantamount to whether a development should go forward, something that seems to be little understood.
- c. After the last local plan an excel document was circulated which listed non-designated assets parish by parish/town. So as long ago as 2009/10 this document was in existence. It could be re-circulated and ask each local authority to fill it in. Local knowledge is very important on consultation.

Question 40 draft policy HE5 Historic Parks and Gardens

- a. Agree broadly.
- b. Setting is extremely and should be given high priority, as often an area in which a development may be proposed is unremarkable but the effect on setting is tantamount to whether a development should go forward, something that seems to be little understood. Same as above, policy do repeat themselves.
- c. Set up a buffer zone which could be applied to these if there is no substantial development close to them.

Question 39 draft policy HE6 Archaeology

Question 37 draft policy HE2 Heritage Assets

Agree broadly.