

MARESFIELD PARISH COUNCIL
REPRESENTATIONS ON THE WEALDEN DRAFT LOCAL PLAN
MAY 2024

Chapter 2: Wealden District Key Characteristics

The themes and issues in Chapter 2 should, logically, follow the same order as in Chapter 3.

Chapter 3: Vision and Objectives

In broad terms, these are supported.

Chapter 4: Spatial Strategy

Policy SS1 Spatial Strategy for Wealden

The spatial strategy does not give enough consideration to the regional context within which the district sits. Wealden is one of the most rural districts in the south-east region, evidenced by the fact that over half – 53% - of the district is AONB landscape and 24% is wooded.

Figure 3 (Chapter 2, p.26) labels towns in Wealden, such as Uckfield, as ‘main towns’. However, it also labels towns outside of Wealden in the same way. The key difference is that the ‘main towns’ in Wealden are of a comparatively much reduced size in terms of population. Uckfield’s population is some 16,000. In contrast, Haywards Heath’s population is over 40,000, Burgess Hill’s is over 33,000 and Eastbourne’s population is well over six times Uckfield’s population, exceeding 100,000. Immediately upon entering Wealden in the north, for example, one leaves the urbanised centre of Tunbridge Wells with a population of over 115,000 and enters the parish of Frant, a much more rural area with a population just over a hundredth of the size. The character very obviously changes from urban to predominantly rural. This character persists deep into the district and is certainly the prevailing character in the parish of Maresfield, with its three villages and nearby Ashdown Forest.

Paragraph 4.7 in Chapter 4 summarises the key issues for the district:

“Meeting the development needs of the area is a key focus of this plan. However, we are also required to consider whether we can meet development needs without adversely impacting areas or assets of importance, such as our designated biodiversity sites and irreplaceable habitats, national landscapes such as the South Downs National Park and High Weald Area of Outstanding Natural Beauty (AONB), designated heritage assets or areas at risk from flooding. We must consider whether these factors are reasons to restrict growth in our area, or whether it can be demonstrated that adverse impacts would significantly outweigh the benefits when assessed against the NPPF as a whole.”

We consider that the very rural context of the district must be duly acknowledged and be the starting point for shaping our district during the Plan period. All attempts

to minimise urban development should be taken, recognising that surrounding districts (and toward the south of our district) are much more urbanised. This is especially important given the level of housing proposed, particularly in the north of the district, as well as the proposed level of employment space. The impact of all this new development on the people who live in the district must be given due consideration.

Policy SS2: Provision of Homes

Maresfield Parish Council is very concerned about the proposed housing target. It considers 15,279 new houses to be excessive, particularly given that Wealden is largely a rural district. We are concerned that the proposed housing number in the Draft Local Plan of 953/year could increase to 1,200/year, particularly given the proposed new call for sites. It is worth noting that this figure for building houses has never before been achieved in Wealden.

This 1,200/year figure is Wealden's local housing need over the Plan period using the standard method, based on 2014 projections. During the previous 16.5 years, there have been 10,604 completions. This is only 53% of the purported need for the next 16 years. There is clearly a mismatch between actual need and the figure of need derived from the standard method. Why, then, does the Draft Local Plan seek to accommodate an additional 28% over and above Wealden's existing housing stock in just 16 years, the vast majority being proposed on greenfield sites? This would see the housing increase by well over a quarter in the Plan period. Ironically, were government to make use of 2018 projections in the standard method calculations and not the 2014 projections, the purported need would be reduced by almost the same amount (27%) to 642 houses/year.

The intrinsic and comparatively rural character of the district, particularly in the north, is the very reason why significant allocations for housing and employment will have adverse impacts, including on the people living in those areas, which, in our view, would not be outweighed by any tangible benefit.

Table 5

Draft Distribution and Amount of Housing Growth up to 2040 on a Parish Basis

Maresfield Parish Council comments on the two allocations in Maresfield (MA1 and MA2) in its responses on Chapter 13 Site Allocations.

We note our concern that a windfall of 46 no. dwellings has been allowed for in the Draft Local Plan. However, there appears to be no coherent methodology informing this figure nor any evidence of availability of windfall sites within the development boundary. We would therefore question how and why this particular figure, which is almost as many dwellings as remain committed but as yet unbuilt (as of 1 October 2023), is being included in the Plan. If such methodology and/or evidence exists, greater transparency and clearer signposts to the evidence base should be provided.

Owlsbury - Do you have any comments at this stage in relation to the site at Land at West of Uckfield – Owlsbury

Maresfield Parish Council would not support an allocation of this scale on this site. In our view, the site has come forward with one owner and a willing promoter to deliver potentially 2000+ houses and other uses, rather than Wealden District Council having worked closely and collaboratively with all sectors in the district, notably our communities, to evaluate what is needed and where is most appropriate to deliver it.

Uckfield is a good example of where a lack of masterplanning has resulted in ad hoc and piecemeal developments with little to no joined-up thinking. Indeed, the impact on Uckfield from this development at Owlsbury would be immense, even more so when the development at Ridgewood is taken into account.

Uckfield would become unrecognisable in terms of population and the inevitable impact on the landscape and environment would be significant, including, but not limited to: on the Ashdown Forest, ancient woodland, water courses, biodiversity, priority habitat deciduous woodland, hedgerows, hedgerow trees, medieval field patterns, increased risk of flood from run off/loss of groundwater storage and the Strategic Uck Valley Green Corridor.

Owlsbury Farm is remote from Uckfield and a 20-minute neighbourhood, as promoted by the Draft Local Plan, could not be achieved. There are also significant highway capacity constraints which, as yet, remain unresolved.

A development in this location would thus be contrary to the vision and objectives of the Draft Local Plan and the NPPF and should be resisted at all costs.

Policy SS5 Provision of Employment Floorspace

Maresfield Parish Council considers that the reliance on the Past Take-up Model in the report from the *Employment and Economic Study: Eastbourne and Wealden, Icení Projects, April 2022*, is flawed in that it does not take account of the overriding rural and spatial character of the district. Essentially, the Past Take-up Model assesses historic completion rates and then extrapolates these across the Plan period. As a result, the Draft Local Plan is recommending 48.3ha (196, 687sqm gfa). If, however, it used the Labour Supply Model, also considered by the Icení report, the land required for employment would be significantly lower, at around 8.7ha (subject to adjustments).

With a potential reduction of some 39.6ha in provision between the two methodologies, it is not difficult to see how much of the impact on all aspects of this rural district would be avoided, but notably the impact on the landscape, environment and already strained highway network. With an over-supply and high provision of employment floorspace, increases in-commuting would be inevitable, contrary to the vision of the Draft Local Plan.

In our view, suggesting that future growth rates for the next 16 years will follow the same trend as previously is ill-judged (particularly as two other legitimate methods can be utilised instead) and will sentence already pressured greenfield areas into being turned over to employment space for a long time to come. If the Labour Supply

Model was used instead, Policy SS5 would already facilitate more than double the necessary provision for employment floorspace at 84,850 sqm.

The Draft Local Plan fails to justify why the Past Take-Up Model has been used and we would seek clarity around this.

We endorse the representations made by Fletching Parish Council in this regard.

Policy SS6 Strategic Employment Allocations

Please see our response to Question 7 in which we conclude that existing employment land allocations are sufficient.

The preamble to this Policy SS6 at para 4.68 should consider east-west routes, such as the A272, in addition to the A26/A22/A27 corridor. The NPPF is clear at para 87 that storage and distribution uses rely on a well-connected and robust network of major roads.

We return again to our point that Wealden district, particularly the north, is ill-equipped to accommodate additional employment land, certainly without serious harm to its inherent, rural characteristics. Again, the Draft Local Plan must consider the regional context within which Wealden sits, that the district's overriding character is rural, acknowledge the limitations of its infrastructure and its constraints (e.g. AONB) and recognise that additional employment land would be better situated near a centre like Eastbourne, with better SRN and road access and proximity to urban amenities.

We endorse the representations made by Fletching Parish Council in this regard.

Ashdown Business Park, Maresfield

Maresfield Parish Council does not support the expansion of the Ashdown Business Park, nor the proposal currently with Wealden DC for determination. Wealden DC will be aware of our representations to this proposal.

Our responses to questions 7 and 8 above conclude that there is no need for additional allocations of employment land and that the district is too constrained to accommodate such levels of employment land without excessive harm. If the proposed levels of employment land are inflated, it follows that they would, once built, be unsustainable, providing an over-provision of floorspace on out-of-town sites. In addition to an adverse impact on the already limited road network, serious harm could arise to, for example, ancient woodlands, watercourses, biodiversity, the Nature Recovery Network, the Ashdown Forest and wider landscape, our dark skies, current carbon stores and could increase the risk of flood.

In summary, Maresfield Parish Council considers that the Draft Local Plan's reliance on the Past Take-up Model to determine future employment land need grossly inflates the figures. If the Labour Supply Model is used, the figures are not only much more achievable but also have much less impact 'on the ground'. In addition, we consider the location is wholly unsuitable; notwithstanding this, we would be entirely opposed to retail provision here. Provisioning for employment land in a rural area with poor connections is not sound planning. Employment allocations would be far

better located in less rural areas and near to robust road networks, such as within proximity of the upgraded A27 and the M23.

We endorse the representations made by Fletching Parish Council in this regard.

Policy SS7 Ensuring Comprehensive Development and Housing Delivery

Maresfield Parish Council broadly supports this policy. We endorse expediting development once permission is granted. Ways in which protracted phased development can be reduced and whole sites developed, rather than ad hoc development, are welcomed.

Policy SS10 Green Infrastructure

This policy is broadly welcomed.

Chapter 6: Natural Environment

Maresfield Parish Council strongly supports para 6.1. The overriding character of Wealden as a rural district must be emphasised. The Draft Local Plan states that 61% of all woodland in the district is Ancient Woodland and the High Weald AONB contains 7% of all Ancient Woodland in England. There are many other designations of national and international significance, such as the Ashdown Forest and various SSSIs, for example.

Policy NE4 Woodland, Trees and Hedgerow

Para 6.79 refers to the use of TPOs, ‘...particularly when they are considered at risk’. The ‘risk’ is not elaborated upon but Maresfield Parish Council considers that important trees can often be caught up in disputes (e.g. between neighbours) and this can put these trees at risk from felling. Wealden DC should be proactive in applying TPOs rather than disengaging until a dispute is resolved. Policy NE3 could be reinforced in this regard.

Policy NE4 Ancient Woodland and Veteran Trees

Maresfield Parish Council broadly support this policy but recommend that the policy stipulates a *minimum* distance for buffer zones, extendable should the circumstances justify it.

Policy NE5 Ashdown Forest SPA

Maresfield Parish Council support this policy and the 400m buffer zone.

Policy NE6 Landscape Character

Maresfield Parish Council broadly accepts the thrust of Policy NE6 but considers it could be made much more robust to ensure that all development must, at the very least, conserve landscape character or it will not be supported by officers. Additionally, applicants should be required to submit bespoke, detailed and site-specific assessments rather than relying on the more broadbrush national Landscape Character Assessment (2022).

Part 1 of the policy is somewhat contradictory in that it seeks a landscape-led approach to ensure any adverse impacts are avoided, after which mitigation measures could be considered. Surely mitigation measures would not be required if adverse impacts had been avoided and harm would not result from the development?

We would recommend that part 4 of the policy is widened to include views in and around, within, and to and from areas of landscape.

Policy NE7 The High Weald National Landscape

Maresfield Parish Council supports this policy.

Policy NE9 Agricultural Land

While Maresfield Parish Council broadly supports this policy, we are concerned to ensure that agricultural land which might not be categorised as 'best and most versatile' may be lost despite having some value (ie. not necessarily just for food production). We consider that, as a baseline, the policy should seek to protect all agricultural land from the outset.

Policy NE10 Light Pollution and Dark Skies

Maresfield Parish Council supports this policy. However, we consider it should make reference at part f to the use of timer switches and make it more explicit that lights should be turned off after dark/overnight, not just when they are 'not required'. In addition, we consider that the policy should also make clear that residential development (new, extensions or conversions) is included. Lastly, the policy could incorporate a reference to the use of planning conditions being imposed on permissions given to ensure that any approved lighting regime remains in accordance with the policy into the future.

Policy NE11 Noise Pollution

This policy is generally supported but we would add that, in part 1, a recognition of a cumulative build-up of noise needs to be considered. For example, if a landscape area is already suffering from nearby road noise, a new development might not only contribute to the noise level but worsen an already unsatisfactory situation.

Chapter 7 Historic Environment

Maresfield Parish Council endorses the comments with respect to the chapter on the Historic Environment made by Frant Parish Council and reproduce them here.

The Parish Council recommends the following:

Para 7.12: The way in which the historic environment and heritage assets provide people with an 'anchoring' effect, creating a sense of belonging and well-being, should be added to the list here.

Para 7.14: Given the sensitivity to and vulnerability of the historic environment and its assets to development, this paragraph is not robust enough. The thrust of this paragraph seems to be about positively managing change and development, as

though this were a given, rather than positively and actively seeking to protect and conserve the historic environment and its assets, in accordance with national policy. The last sentence refers to not diminishing the historic environment and its assets for 'future generations'. This should read for 'current and future generations'.

Policy HE1: The Conservation, Protection and Enhancement of the Historic Environment

Part (c) should be amended to add 'This may necessarily involve removing parts of the proposal'. This is because not *all* parts of a proposal may be capable of being mitigated against.

Part (e) should be amended to read '...important views between historic settlements and within them, and across the landscape'. This acknowledges that there are sometimes key views within clusters of listed buildings (or unlisted buildings that make a positive contribution), such as historic farmsteads or 'the main house' and the workers' cottages, the gate lodge, etc, particularly when these views help the visitor to interpret the relationship between these buildings.

Part (f) should be amended to acknowledge that the impact of noise, parking, etc. can be cumulative and not just as a result of what might arise from one new development proposal. For example, there may already be the impact of nearby road noise in the setting of a listed building which is already causing harm. Exacerbating this with a cumulative impact of further noise should be actively avoided.

Part (h) should be amended to read '(including above-ground archaeology, such as buildings and structures'. This is also relevant to para 7.15, where there are two references to above-ground archaeology of only buildings and not structures as well.

Para 7.17 – we would query what is meant might by a heritage interest being 'artistic' (last sentence) and would recommend elaborating on the historic interest as often being partly due to an historic space or building being related to an historic figure or event.

Para 7.21 – we wholly support the provision of a local list and would welcome any consultation on this. We would add that, given that there are very few adopted Neighbourhood Development Plans in Wealden, Wealden DC should not rely on them in terms of identifying buildings or structures of interest for a local list.

Paras 7.23 and 7.24 – it should be acknowledged that, in some cases, the original or early systems in buildings for insulation, etc. may be one of the very reasons why it was listed in the first place and thus should be retained.

Para 7.25 – this paragraph could also include when an application reveals the significance of a building or structure that could be added to a local list which hitherto had gone unrecognised. This is important because Wealden DC may wish to add this building or structure to the local list during the lifetime of the application which might, in turn, may affect its determination of the application.

Policy HE2 Heritage Assets

Part 3 suggests that ‘as a minimum, the historic environment record should be consulted...’ when producing heritage statements to support development proposals. We would argue that this is the absolute bare minimum, given that historic records are frequently only a sentence or two and convey few, if any, of the reasons why a building or structure was originally listed or give a complete record of what is special about it.

Part 4: As above, under our comment on Policy HE1, this should make reference to views in and around and within clusters of historic buildings and their settings – see below.

‘...important views between historic settlements and within them, and across the landscape’. This acknowledges that there are sometimes key views within clusters of listed buildings (or unlisted buildings that make a positive contribution), such as historic farmsteads or ‘the main house’ and the workers cottages, gate lodge, etc, particularly when these views help the visitor to interpret the relationship between these buildings.

Part 7 should be amended to read ‘..where it can be demonstrated that proposed measures take a ‘whole building approach’ that are suitable for the asset and will not be harmful to it...’.

Part 8 (a) – ‘attempts to market the building to a new user’ should be amended to include ‘new user/owner’ and ‘should demonstrate that all reasonable offers have not been declined’. Overall, part 8 (a) could be made more robust by requiring more detail and fully evidenced reports. The policy wording, which asks for ‘evidence of redundancy’, is weak and could be exploited by an applicant.

Part 10 should be amended to include that the programme of recording and analysis and archaeological excavation should be carried out in full and to the appropriate standard and satisfaction of the East Sussex Historic Environment Record prior to any work commencing on site.

Part 13 should make clear that the financial considerations of the applicant are not a reason for allowing any harm or loss to an asset.

General comment for preamble text

The wording should include that the Council will seek to reserve the use of reclaimed materials, for example, roof and hanging tiles, for repairs to listed buildings. Extensions, etc. to listed buildings should make use of suitable alternatives and new materials, in part to distinguish the new from the original/host building but also, as above, to protect the stock of reclaimed tiles needed for repair. If one considers an historic catslide roof on which a handful of tiles need replacing, the effect of not being able to get hold of reclaimed tiles to pepper-pot around the roofscape and instead having to use new tiles, would be seriously harmful.

Chapter 9 Infrastructure

Policy INF1 Infrastructure provision, delivery and funding

Maresfield Parish Council broadly supports this policy. However, we consider that it could be made more robust, particularly at parts 3 and 4, to ensure that any infrastructure that is immediately required by a new development will be implemented prior to occupation, secured by a Grampian condition(s). In addition, we consider that the definition of 'infrastructure' should be kept under review due to technical advancements, such as full fibre provision.

Policy INF3 Parking Provisions

This policy should include a provision that where garages are provided in new residential development that contribute to the appropriate number of spaces per dwelling, applications to convert these garages to living space will be strongly resisted. This is to protect the original layout and design of the development and to avoid an increase in on-street parking which, in time, could cause congestion.

Policy INF4 Utilities

The policy should refer to the use of Grampian conditions to ensure that the necessary utility provision is implemented prior to occupation.

Chapter 10 Design

Policy DE1 Achieving well-designed and high quality

This policy is broadly supported. While it is understood, however, that much is gleaned from advice from CABI and other bodies, suggesting that 'all development must be beautiful' (part 1) is inappropriate. That is not to say that all development must not be of a high quality of design but using terms such as 'beautiful' is not helpful, particularly when in relation to large housing schemes where profit is the primary driver for developers. It is obviously also a subjective term so opens the District Council up to potential disagreement with applicants.

In our view, all design must be good enough to approve, not poor enough to refuse. The preamble text should reflect this. Developers will continue to produce 'anywhere' developments if allowed to. Thus, we consider that the policy should be elaborated upon to refer to inter alia 'Sussex-specific' design cues, not just the more generic 'high quality design and standards'. In addition, the policy should make explicit that developers are required to demonstrate due regard to the Supplementary Design Guidance and High Weald Design Guide and appropriate environmental design standards.

Part 3 j – we consider that the following should be added for clarity:

“Are design to avoid unacceptable adverse impacts of harm to the amenities of neighbouring properties, including gardens and outdoor space, ...”

Part 3 m – The text should include reference to the importance of heights of buildings responding well to the width of the road.

Para 10.22 – We consider that masterplans should be required for 15+ new houses, especially given the size of sites coming forward over the Plan period. The provision of 15 houses is a significant development, with a potential population of anywhere upwards of 40-75 people, and could greatly benefit from an holistic approach to the plan for the site.

Para 10.24 – While laudable, it would help if clarity is given to how a ‘*collaborative approach between residents, the Council, developers and other parties*’ would work in practice. Now that residents who live within proximity of development sites no longer receive letters from the Council informing them of current planning applications that may affect them (and site notices are often pulled down), we all too often hear of their surprise to find they have only a few days to respond to, or have missed altogether, the period of consultation. This was particularly apparent with current application at the Ashdown Business Park. Thus, a more collaborative approach would be very welcome, but, to avoid it merely paying lip service to this approach, the Council should convey how it thinks this will work. Bringing back neighbour letters would be a way forward to ensure inclusivity and allow residents to engage in the application process.

Policy DE3 Spaces for people, nature and the public realm

This policy is broadly supported.

Policy DE4 Shop Fronts and Advertisements

Part 1(c) – We suggest the addition of the following text: ‘...new and replacement shop fronts should take into account the traditional architectural detailing and proportions of adjacent and nearby historic shop fronts....’. This is because historic shopfronts will have particular proportions (often in relation to their period, e.g. Victorian) between their stall riser, windows, fascia, etc., in addition to the detailing of the transoms, mullions, pilasters, cornices, and so on.

Part 1(d) - We consider that the text should be extended in the last sentence to state that historic blinds that survive in situ should be retained, whether their mechanisms are restored to full functionality or not.

Part 1 (e) – The text in the last sentence needs to be made more robust and state that solid external shutters will not be permitted on listed buildings except in very exceptional circumstances and will be resisted on buildings within Conservation Areas.

Part 5 – A reference to the Dark Skies policy would be appropriate here.

Chapter 11 Economy

Policy EC4 Rural Economy

Part 1 (a) – a justification for a rural business should include a detailed report to that end.

(g) – Additional text is recommended as follows: ‘...and the site’s existing vehicular access is suitable or can be made suitable without harm for the proposed use’.

Part 3 (d) – We recommend the following amendment to the text: ‘The design, scale and location of the building and its curtilage relates well to the intended rural use...’.

Chapter 13 Site Allocations

There are two housing allocations in Maresfield, MA1 and MA2, and these are both considered below.

Reference MA1 – Land South of Maresfield, A22, Maresfield

Maresfield Parish Council notes that this is a significant housing allocation for the village of Maresfield at 210 new dwellings. While we would obviously prefer a lower number we understand the consequences of that, namely that the provision of community benefits via the development would be much less likely to be forthcoming as with less development, it becomes less viable to do so. In addition, we understand that if a smaller portion of the total land was allocated for a smaller number of houses, inevitably, over time, the other parcels of land would come forward for development. This would create an unwelcome situation of ad hoc, piecemeal development over a protracted period of time without, as above, any tangible community gain or benefit and certainly no dedicated, direct access off the highway, putting undue pressure on the local road network.

Thus, the Parish Council could support the allocation if the following requirements were assured and met, some by way of a s106 legal agreement, some via condition or by a commitment from Wealden DC:

- a new roundabout and access off the A22 to serve the site;
- community benefits, such as, but not limited to, a new village hall;
- an extension to the Maresfield Recreation Ground and the provision of suitable green space within the development;
- the whole site be developed as one, rather than in plots and/or phases;
- the use of conditions to ensure the community benefits come forward as certain numbers of houses are completed;
- that Wealden DC seek to expedite the development by requiring the works start within a period substantially less than the normal 3 years of the permission being extant.
- the community and the parish council are fully engaged at a pre-application stage and during the application itself to resolve matters as above, and also housing mix, scale and design.
- any infrastructure that is required is implemented prior to development commencing.

Reference MA2 – Land South West of Park Farm, A22, Maresfield

Maresfield Parish Council can only support this allocation if the access to the allocated site is made through the access at the indoor bowls facility and not through Wellington Gate.

Wellington Gate is already highly congested and difficult to navigate with parked cars on the street. Allowing access to an additional 25 no. households would only

seriously exacerbate this situation and Wellington Gate could not sustain this level of additional traffic.

In addition, the Parish Council would expect an appropriate pedestrian crossing to be implemented between Batts Bridge Road and the Ashdown Business Park.

Windfall allowance

We note our concern that a windfall of 46 no. dwellings has been allowed for in the Draft Local Plan. However, there appears to be no coherent methodology informing this figure nor any evidence of availability of windfall sites within the parish boundary. We would therefore question how and why this particular figure, which is almost as many dwellings as remain committed but as yet unbuilt (as of 1 October 2023), is being included in the Plan. If such methodology and/or evidence exists, greater transparency and clearer signposts to the evidence base would be helpful.