

WIVELSFIELD PARISH COUNCIL

Taylor Wimpey planning application for 150 houses on Land South of Green Road, Wivelsfield Green, ref LW/24/0820

Wivelsfield Parish Council objects to the additional materials submitted by Taylor Wimpey in support of their planning application LW/24/0820, and objects to the decision by the Highways department of East Sussex County Council to remove their objection to the planning application. This document outlines the rationale for these objections.

1. Overview and Grounds of Objection to Taylor Wimpey additional materials

The Parish Council objects to the additional materials submitted in support of application LW/24/0820 on the following grounds:

- Flood risk and drainage
- Landscape and visual impact
- Heritage impact
- Procedural and evidential inadequacy

Taken together, the application fails to demonstrate that the development would be safe, policy-compliant, or acceptable in principle. Critical technical matters are deferred, based on un-validated modelling and outdated assessments, contrary to national and local planning policy.

2. Flood Risk, Drainage, Culverts and Infiltration

The submitted Flood Risk Assessment relies on:-

- Conceptual mitigation
- raised land platforms
- culverts and piped systems to manage flood risk.

It does not demonstrate that the development will be safe for its lifetime, nor that flood risk will not be increased elsewhere.

2.1 Raised land platforms

(NPPF §§159–161, 167; PPG Flood Risk)

The general drainage rule is that ground levels should not be raised to disperse the water elsewhere. Flood risk mitigation is then relied on to justify the principle of development, yet is explicitly stated to be subject to future refinement. This conflicts with national guidance and LLFA practice, which require flood pathways and safety to be resolved at outline stage.

2.2 Un-validated and Unreliable Modelling

(PPG Flood Risk; EA FRA Guidance)

The hydraulic model is not calibrated or validated against observed flood events, despite known winter flooding, waterlogging and high flows across the site. Only two site visits are referenced (one summer, one winter), with no continuous flow or level monitoring. Without validation against real-world conditions, the model remains theoretical and cannot be relied upon to demonstrate flood safety.

2.3 Existing Culverts and Watercourses Already at Capacity

(NPPF §167; LLFA Best Practice)

Local evidence confirms that the existing ditch and culvert network already operates close to capacity during winter months. The assessment provides:

- no measured flow rates or water levels
- no volumetric capacity analysis
- no sustained monitoring

Assumptions about existing capacity are therefore unsubstantiated. Any increase in runoff or displacement of floodwater risks exceedance both on- and off-site.

2.4 Reliance on Culverts and Residual Risk

(NPPF §167; §169)

The strategy depends on culverts and pipes remaining unblocked. Blockage scenarios are dismissed as “residual risk” despite their implications for residential safety. Planning policy is clear that safety must not rely on perfect operation or ongoing maintenance.

2.5 Misrepresentation of Infiltration and Soil Conditions

(PPG Flood Risk – Best Available Information)

The assessment assumes loamy/clayey soils with infiltration potential. Local excavation evidence and long-standing flooding demonstrate heavy clay soils with negligible infiltration. Fields within the site flood every winter and rely on ditches and ponds to manage runoff.

If infiltration were correctly modelled as negligible, flood extents and infrastructure demand would increase significantly. Flood risk is therefore underestimated.

2.6 Inappropriate Use of Roads as Flood Pathways

(NPPF §167)

The proposal relies on estate roads acting as flood conveyance routes. This represents engineered acceptance of flooding rather than mitigation and would leave local residents managing flood impacts after the developer has departed.

3. Landscape and Visual Impact

3.1 Reliance on an Outdated LVIA

(GLVIA3; NPPF §49)

The Landscape and Visual Technical Note relies on an original LVIA prepared for a different scheme. However, the proposal now includes:

- raised land levels (up to ~0.5m)
- repositioned SuDS features
- relocated open space and play areas

These are material changes affecting landform, openness and visibility. Best practice requires a revised LVIA and a short technical note is not sufficient.

3.2 Harm to Countryside Character and Settlement Setting

(NPPF §§174, 180; Emerging Lewes Local Plan)

The site lies outside the settlement boundary and forms part of the rural setting of Wivelsfield Green. Raised platforms, engineered SuDS and suburban features erode openness and extend development into open countryside.

The amendments suggest that there would be no change to the visual effects due to the raised levels of the buildings but there would be significant adverse and long term effects on close local views from public vantage points as a result of the development. As set out in the original comments from the ESCC Landscape Officer, there would be significant permanent adverse effects on the character of the landscape and the rural setting to the village due to this development. As this is an outline application there could be further changes and adjustments to levels at the detailed design stages therefore it is difficult to be certain of the likely landscape and visual effects on the local area.

Mitigation planting cannot replace the permanent loss of landscape character, particularly in early and medium years.

3.3 Harm to Public Rights of Way and Long Views

(NPPF §185(c); Wivelsfield Neighbourhood Plan)

PRoWs are highly sensitive receptors. The assessment downplays visual harm despite acknowledging increased built height visibility. Protected long views identified in the

Neighbourhood Plan are not properly mapped or assessed, particularly in relation to raised ground levels.

4. Heritage Impact

4.1 Failure to Update Heritage Assessment

(NPPF §§189–199)

A revised Development Framework Plan and drainage strategy have been submitted, yet the Built Heritage Technical Note asserts—without evidence—that the original Heritage Impact Assessment remains valid.

Drainage works involve re-profiling, attenuation features and engineered channels that can affect historic landscape character, archaeology and setting. No updated assessment, drawings or analysis are provided.

This undermines informed decision-making and conflicts with national heritage policy.

5. Procedural and Evidential Failure

Across flood risk, landscape and heritage, the application relies on:

- outdated assessments
- unvalidated models
- assumed baseline conditions
- deferral of critical mitigation

This represents a failure to provide a robust and up-to-date evidence base, contrary to NPPF §49 and established case law.

6. Overall Planning Conclusion to Taylor Wimpey additional documentation

The application fails to comply with national planning policy, emerging Lewes District policy, and the Wivelsfield Neighbourhood Plan. Flood risk is engineered around rather than avoided; landscape harm is underestimated; heritage impacts are not reassessed; and key evidence is missing. The application should therefore be refused.

7. Comments on East Sussex County Council withdrawal of Highways objection

The Parish Council would also like to register objections to the withdrawal of the objection to the development by East Sussex County Council Highways.

- 7.1 The report confirms that “A Non Motorised User Audit has still not been provided. NMU audits are essential for assessing safety and accessibility for pedestrians, cyclists, schoolchildren, and vulnerable users. This is a fundamental omission as without this audit, ESCC cannot reasonably conclude that the development is safe or accessible.
- 7.2 The proposal relies heavily on widening existing footways “where possible” to 2m. However ESCC itself acknowledges that only illustrative plans exist for these works, and that pinch points will remain. Much of Green Road and Eastern Road is also constrained by mature trees, narrow verges, and private boundaries. Eastern Road will have a footway as narrow as 1.2m, which is below recommended minimums for safe two-way pedestrian movement, especially for pushchairs, mobility aids, and children walking to school. This falls short of creating a safe, continuous, accessible route for the hundreds of new residents the development would generate.
- 7.3 ESCC confirms that no direct link to the Primary School is possible due to security concerns. This means: All children must walk along Green Road and South Road—routes already heavily trafficked and lacking adequate width. The development will therefore significantly increase pedestrian demand without providing a safe, segregated route which is a major safety issue that has not been resolved.
- 7.4 The modelling relies on assumptions and data that have previously been challenged, including the use of outdated census information in earlier submissions. The Authority however not only accepts the applicant’s modelling, but also accepts that the junction already operates “at capacity for a short time during peak hours”. Adding 642 daily car trips including 68 PM peak-hour trips and 36 right-turn movements into the site during the PM peak will inevitably worsen congestion and queuing. The conclusion that the impact is not “severe” is therefore not convincingly supported.
- 7.5 ESCC concludes that a right-turn lane is “not justified” but this is based on the applicant’s analysis itself based on a single sensitivity test and limited survey data. ESCC previously raised concerns about the geometry and safety of this access, including refuse vehicles needing to use the full carriageway. These concerns appear to have been set aside without clear evidence that the revised design fully resolves them. Given the scale of the development, a dedicated right-turn lane should not be dismissed so lightly.
- 7.6 The report repeatedly states that key design elements will be resolved “at detailed design stage” through s278 or s38 agreements including final access geometry, Footway widths, cycle link alignment, drainage and lighting. Deferring so many critical matters means the planning authority is being asked to approve an outline application without certainty that safe, deliverable solutions exist.
- 7.7 Similarly ESCC seeks £1,430 per dwelling to maintain bus services beyond 2026 but sustainable transport cannot be assumed based on financial contributions alone and there is no guarantee whatsoever that operators will continue services once funding ends.

7.8 ESCC acknowledges that Chailey School already has transport capacity issues and that ESCC is legally required to provide transport for pupils living over 3 miles away. Adding up to 150 new dwellings will exacerbate this pressure and the financial contribution does not resolve the underlying capacity problem.

In summary, ESCC's decision to withdraw its objection is premature. Significant concerns remain unresolved, and the evidence presented does not justify the conclusion that the development will have no severe impact on the local highway network. We request that Lewes District Council review this withdrawal and reinstates the Highways objection, and refuses the application until the applicant provides complete, robust, and independently verified evidence demonstrating that the development will not result in severe impacts on highway safety, accessibility, or capacity.