

Framfield Parish Council – Further Representation

Application No: WD/2024/2941/MRM

Proposal: Reserved Matters (appearance, landscaping, layout and scale) pursuant to outline permission WD/2021/0573/MAO for up to 58 new homes (including 35% affordable housing), new access road, open space and soft landscaping.

Site: Land at Old Nursery House, The Street, Framfield TN22 5PN

Date: 10 November 2025

Framfield Parish Council continues to object to the above application. While we acknowledge that the principle of development was established through the outline permission and subsequent appeal decision, the Parish Council remains concerned about the way the Reserved Matters (RM) application has evolved and the implications this has for local infrastructure, flood risk, design quality, and public confidence in the planning process. We also wish to highlight that this has also presented confusion to local residents, which was expressed in recent email communications to the Assistant Team Leader for major and strategic applications.

We are grateful for the clarifications recently provided by Wealden's planning officer and recognise that our earlier comments have been considered. However, the fundamental issues that underpin our objection remain unresolved.

A key concern remains the way in which the RM application has been managed. Since the original submission, forty-eight documents have been revised or replaced, yet there has been no further formal re-consultation. While officers maintain these were "minor" or "non-material" amendments, from a public and parish perspective this has created confusion and undermined confidence. Although all documents have technically been available on the portal, the piecemeal and iterative upload of revisions, often in response to consultee feedback has resulted in a rolling application that evolved without clear opportunity for renewed public engagement. This is not only a procedural matter but one that raises questions of transparency and fairness. We appreciate the officer's recognition of how this may have appeared and welcome the assurance that lessons will be taken forward for future cases.

The Parish Council maintains its serious objection to the adequacy and deliverability of the proposed drainage strategy. The applicant's own modelling confirms that the principal access is subject to flood hazard levels described as "Danger to All", with impassable conditions during a 1-in-100-year event (with climate change allowance). This is incompatible with national policy requirements for safe access and egress at all times. Infiltration is ruled out, and the proposed connection to a highway drain remains unconfirmed, pending CCTV survey and consent from East Sussex County Council. The outfall point is uncertain, and discharge rights have not been secured, leaving the drainage solution incomplete. The proposed system relies on bunds, culverts, and so-called "permeable" paving that is in practice impermeable. The modelling indicates increased surface water discharge rates compared with baseline conditions, contrary to the policy requirement that development must not increase flood risk elsewhere. Whilst unconfirmed, if any routing of foul and drainage is subject to legal agreements, conditions must be robust enough that construction does not take place until they are agreed and discharged.

The Parish Council also notes the recent Southern Water discharge into Framfield Stream (6 July 2025, lasting 2 hours and 57 minutes) and ongoing incidents of localised flooding. These events demonstrate the fragility of the existing network and **reinforce the need for a Grampian condition** preventing any construction and occupation until foul and surface water upgrades are proven to be operational and effective. Southern Water's latest comments are so ambiguous in what they deem as acceptable, it should be clarified and conditioned.

Framfield's foul water network is already operating at capacity. Tanker operations are now a frequent and near-permanent feature due to pumping station inadequacies and undersized pipework. Adding 58 dwellings without a comprehensive upgrade plan is untenable. We appreciate the officer's reassurance that outline conditions 9, 10, and 16 control foul and surface water matters; however, the Parish Council believes these conditions must be robustly reviewed, with additional safeguards or triggers to ensure infrastructure works are completed before construction, let alone occupancy.

While acknowledging that some layout refinements have been made since submission, the Parish Council considers the overall design to remain suburban in character, overly formal, and lacking the variation and informality appropriate to a rural village edge. The housing mix continues to prioritise large four and five-bedroom properties, which does not align with local need for smaller homes. Affordable housing remains clustered, contrary to inclusive design principles. The mass and scale of dwellings along the rural edge remain excessive, creating an abrupt and overbearing interface with the open countryside. Limited architectural variation and the absence of locally distinctive materials risk a uniform and uninspired appearance, inconsistent with Framfield's vernacular character.

Although approved through the Outline and Appeal, we must emphasise that concerns about the safety and suitability of the site access also persist, despite comments from the statutory highways authority (which objected... and now does not) and Inspector, we are best placed to provide local knowledge of the road conditions and vehicular behaviours, which by all accounts has been ignored. The approved access lies on a sharp 90-degree bend with restricted sightlines relying on cutback twigs and branches of adjacent hedges. We continue to advise that despite our own evidence (over years), the hedge line maintenance is a constant conversation with the highway authority at ESCC due to dangerous and impeding hedging and foliage – that affects the sightlines for this development. Independent safety audits commissioned locally demonstrate that visibility splays fall short of standard requirements, particularly for HGVs turning right into the site. Vegetation and road alignment exacerbate this hazard. The Parish Council therefore reiterates that the access remains fundamentally unsafe for the proposed level of use. We urge that this issue is revisited and confirmed that requirements are met before traffic uses the access point, as we believe the chances of a serious RTC will be increased significantly. Only last week (5 November), in coincidental timing, two double-decker buses travelling in opposite directions collided on the sharp bend and narrow form of the B2102 at the junction of Gatehouse Lane, approximately 200 metres from this site. This junction is similar in geometry to the bend at the proposed site entrance. This recent incident starkly illustrates the dangers of these local road conditions. The Parish Council cannot emphasise enough its continuing concern for road safety in this area.

The Parish Council continue to question the credibility of the submitted Travel Plan. Assertions regarding sustainable transport options are unrealistic in the context of Framfield's geography and existing infrastructure. References to closed or irrelevant amenities, such as Blackboys Preschool, demonstrate a lack of understanding of local conditions. Cycling to nearby

settlements is unsafe due to high-speed roads and the absence of protected routes. Local footpaths remain boggy, overgrown, and poorly maintained, with no enforceable improvement plan in place. The proposed contribution to public transport is welcome in principle, but its intended purpose and destination remain unclear, and it should be ringfenced for direct benefit to Framfield residents. Part of the application site encompasses these areas and therefore become relevant in the RM application landscaping.

The Parish Council notes the officer's comments regarding the Section 106 Agreement and appreciates the assurance that engagement will take place regarding potential youth and adult play space contributions. However, given the cumulative development pressures already affecting Framfield, we strongly urge that any S106 or equivalent funding be directed within the parish to mitigate local impacts and to support existing community facilities such as the Memorial Hall and recreation ground.

Framfield Parish Council recognises that the outline approval limits what can now be revisited in planning terms. Nevertheless, we believe that the Reserved Matters application fails to deliver a safe, sustainable, and locally appropriate scheme, and that several key issues remain unresolved, notably in respect of drainage, foul water capacity, highway safety, design quality, and the overall transparency of the process.

As part of the approval, we would like confirmation that the eastern and western boundaries, as shown on the submitted drawings are correct. If they are incorrect, then why have the drawings not been amended to reflect true boundaries limits?

Accordingly, the Parish Council maintains its strong objection to this application and urges Members of the Majors Committee to seek substantial further assurances and improvements before any approval is granted.