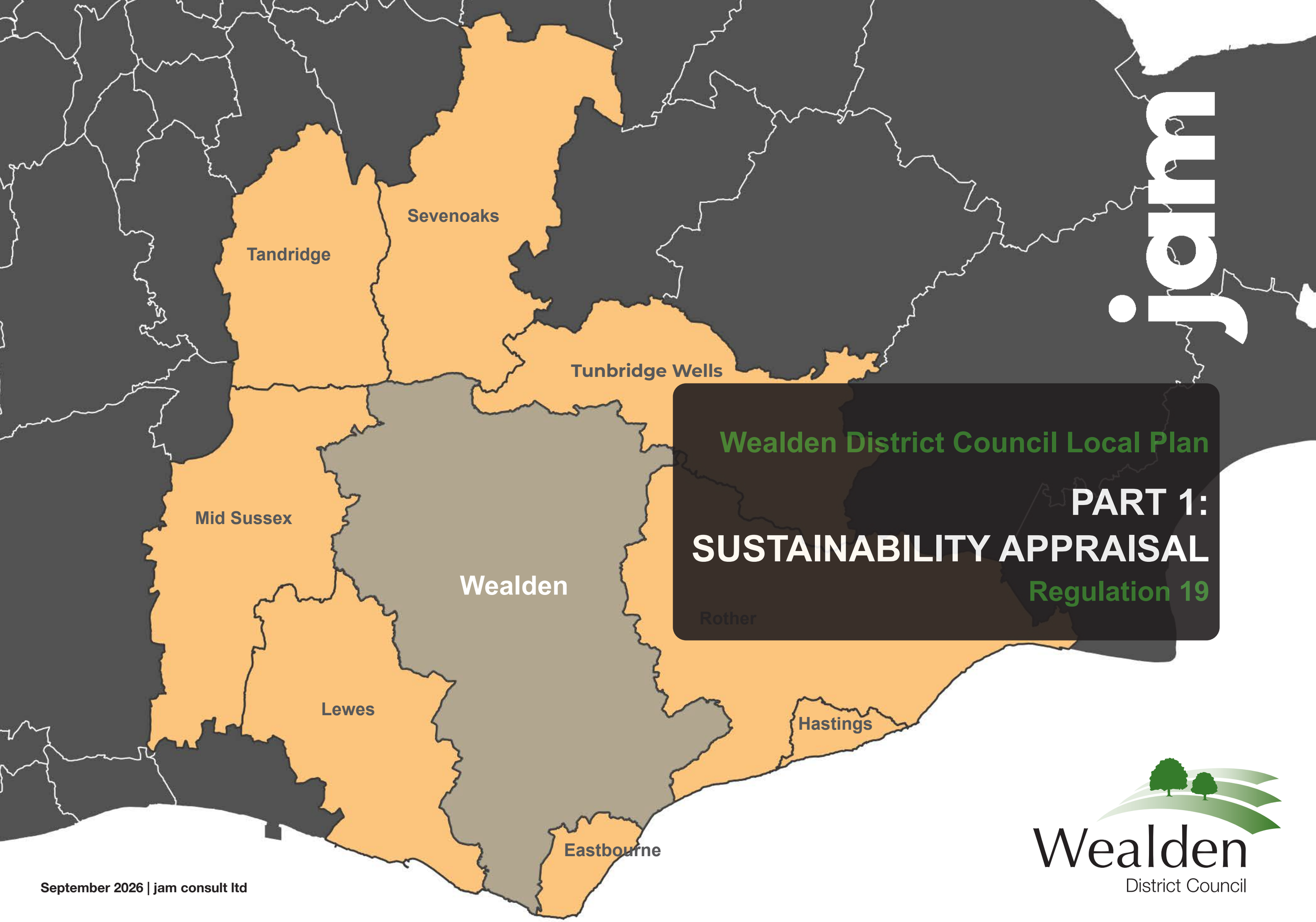


jam

Wealden District Council Local Plan

PART 1: SUSTAINABILITY APPRAISAL

Regulation 19

September 2026 | jam consult ltd

Wealden
District Council

This document has been prepared by **Jam Consult Ltd** of Behalf of Wealden District Council:

Planning Policy Wealden District Council
Council Offices
Vicarage Lane
Hailsham
East Sussex BN27 2AX

Telephone: 01892 602008

E-mail: planningpolicy@wealden.gov.uk

Website: www.wealden.gov.uk

If you, or somebody you know, would like the information contained in this document in large print, Braille, audio tape/ CD or in another language please contact Wealden District Council on

01323 443322 or **info@wealden.gov.uk**

© jam consult ltd

This report has been prepared using the evidence base provided by Wealden District Council. The conclusions and recommendations contained in this SA Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by Jam Consult Ltd has not been independently verified, unless otherwise stated in the Report. The work described in this Report was undertaken between March - September 2026 and is based on the information made available during this period. The scope of this report and the services are accordingly factually limited by the timescale available. It is recognised that further information may become available after this report has been published, which may need to be considered in any further work undertaken.

Contains OS open data © Crown Copyright [and database rights] (2026). WDC OS Licence No. XXXXX.

CONTENTS

NON TECHNICAL SUMMARY i-xii

1 INTRODUCTION

1.1 What is this document? 1
1.2 Why is a Sustainability Appraisal needed? 2
1.3 Background to the Local Plan 2
1.4 Previous Stages of the SA 2
1.5 Equalities Impact Assessment (EqIA) 4
1.6 Health Impact Assessment 4
1.7 Habitats Regulations Assessment (HRA) 5

2 SA METHODOLOGY

2.1 Purpose of the Sustainability Appraisal 6
2.2 Planning Policy and Sustainable Development 6
2.3 The Sustainability Appraisal Process 6
2.4 Stages in the SA Process 7
2.5 Method of Assessment 8
2.6 Limitations of predicting effects 8

3 BASELINE INFORMATION

3.1 Plans, Policies and Programmes 9
3.2 Baseline Information 10

4 ISSUES & OBJECTIVES

4.1 Key Sustainability issues 17
4.2 Sustainability Objectives 17
4.3 The SA Framework 17

5 VISION & OBJECTIVES

5.1 The Vision and Objectives 18
5.2 Assessment of Vision and Objectives 19

6 SPATIAL STRATEGY

6.1 Spatial Option Overview 22
6.2 Regulation 18(1) Options 22
6.3 Selection and Rejection of Options 23

7 SPATIAL STRATEGY REG. 18(2)

7.1 Regulation 18(2) Options 24
7.2 Options 1 and 2 25
7.3 Options 2, 3 and 4 25

8 SPATIAL STRATEGY REG. 19

8.1 Approach to Spatial Strategy 27
8.2 Revised Spatial Strategy 27
8.3 Environmental / Landscape Designations 28
8.4 Housing Need 28
8.5 Employment Need 28
8.6 Transport 29
8.7 Sustainable Settlements 30
8.8 Site Assessment Methodology 31
8.9 Strategic Site Allocations 32
8.10 Spatial Strategy Options 34

9 SPATIAL OPTION 1

9.1 Option Overview 36
9.2 Key Issues 36
9.3 Positive Impacts 37
9.4 Uncertain Impacts 37
9.5 Negative Impacts 37
9.6 Cumulative Impacts 38
9.7 Mitigation 38

10 SPATIAL OPTION 2

10.1 Option Overview 39
10.2 Key Issues 39
10.3 Positive Impacts 40
10.4 Uncertain Impacts 40
10.5 Negative Impacts 40
10.6 Cumulative Impacts 41
10.7 Mitigation 41

11 PREFERRED SPATIAL OPTION

11.1 Overview of the Spatial Strategy 42
11.2 Selection/Rejection of Options 42

12 PLAN POLICIES

12.1 Development of the Plan Policies 44
12.2 Assessment of Plan Policies 44

13 CUMULATIVE IMPACTS

13.1 Cumulative Impacts of the Plan 45

14 MITIGATION MEASURES

14.1 Approach to Mitigation 46
14.2 Summary of Mitigation Measures 46

15 MONITORING

15.1 Monitoring 49
15.2 Uncertainties & Risks 49

16 NEXT STEPS

16.1 Next Steps 50

APPENDICES

Appendices 1- 4:

1. **SA Regulations**
2. **SA Framework**
3. **Summary of Regulation 18(2) Representations**
4. **Local Plan Policies**

The following information is provided in separate reports and should be referred to as part of the SA:

SA REPORT : PART 2
Parish Site Assessments

Appendix A : New & Amended Sites

Appendix B : Sites with Permission

Appendix C : Rejected Sites

SA REPORT : PART 3
Strategic Site Assessments

SA REPORT : PART 4
Policy Assessments

NON-TECHNICAL SUMMARY

Introduction

N.1 This document provides the Sustainability Appraisal (SA) Report for **Wealden District Council's Proposed Submission Regulation 19 Local Plan**. The District's new Local Plan will replace the current set of adopted development plan documents with a new planning framework for the District up to 2042.

N.2 The Local Plan is being prepared under the legacy planning system, which requires the draft Local Plan to be submitted for Examination by December 2026. The NPPF December 2024 has therefore been used for the development of the Plan.

N.3 The SA Report has been issued for consultation alongside Wealden District Council's Proposed Submission Regulation 19 Local Plan in order to:

- ❑ Ensure that sustainable development has been integrated in the formulation of the draft Local Plan
- ❑ Verify that due consideration has been given to social, economic and environmental factors in the plan making process.

N.4 The SA process is intended to promote sustainable development in plan preparation by assessing the extent to which a Plan and its policies, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The process will also help to ensure that the proposed policies and site allocations provided in the Local Plan are adequate and proportionate.

Why is a Sustainability Appraisal needed?

N.5 Under **Section 19(5) of the Planning and Compulsory Purchase Act 2004**, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental – of the plan.

N.6 When conducting a Sustainability Appraisal an environmental assessment must also be conducted in accordance with the requirements of **European Directive 2001/42/EC (The Strategic Environmental Assessment Directive)**, set out in the UK legislation the **Environmental Assessment of Plans and Programmes Regulations 2004, Section 12** (the SEA Regulations).

N.7 Sustainability Appraisals should be in accordance with Government Policy, National Planning Policy Framework (NPPF) 2024 and National Planning Practice Guidance (PPG). Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA Directive. The term SA is therefore used to refer to the combined assessment.

Previous Stages of the SA

Scoping Report

N.8 The first stage in the SA process is to produce a Scoping Report (**Stage A**), which sets out the context and scope of the SA in accordance with the regulations and best practice guidance (see **Figure N1**). A previous Scoping Report was consulted upon and published in 2020/2021 alongside the Direction of Travel consultation.

N.9 An updated Scoping Report was prepared in **June 2023** and issued to the three main statutory consultees (the Environment Agency, Natural England and Historic England), neighbouring authorities, local communities and other interested parties for a 6 week consultation period via the Council's Consultation portal. The updated Scoping Report was prepared to ensure the consideration of new and emerging evidence, legislation and policy changes and to set out the SA Framework and methodology to be used in the assessment. Any updates to the evidence, legislation and policies of relevance to the Plan, which have occurred since the Scoping Report was prepared, are included within this SA report.

N.10 In general, the view was that the Scoping Report provided an appropriate methodology and framework for the Sustainability Appraisal of the Local Plan. The key issues raised related to some changes to the baseline data, in particular Air Quality (Chapter 7) and Water (Chapter 14). The wording for the sustainability objectives and indicators was also refined in response to the consultation to remove any duplication and improve clarity. A number of Plans, Policies and Programmes were also added into Appendix A of the SA Scoping Report.

N.11 A summary of the responses to the **Scoping Report (Update 2023)** are provided at **Appendix A2** of the **Initial SA Report Regulation 18(1), March 2024.**

NON-TECHNICAL SUMMARY

Initial SA Report - Regulation 18(1), March 2024

N.12 The Initial SA Report was issued for consultation alongside the Regulation 18(1) Local Plan in March 2024 until May 2024. A total of 30 direct responses were received in relation to the Regulation 18 Initial SA report. Some additional responses with implications for the SA were made on the Local Plan, which have also been taken into consideration.

N.13 Local Authorities are required to consult with statutory consultees when preparing the SA of the Local Plan, including:

- ❑ The Environment Agency
- ❑ Historic England
- ❑ Natural England.

N.14 With regards to the responses from statutory consultees for the SA process: The Environment Agency did not raise any specific issues on the SA and Historic England considered it too early in the process to make detailed comments.

N.15 Natural England provided a detailed response and raised a range of issues, which are set out in **Appendix 3** of the **Draft Regulation 18(2) SA Report, January 2026**. In particular, Natural England had significant concerns about the Frant site allocations given the considerable direct impacts to the High Weald National Landscape and the effect this could have on the conservation of the natural beauty of the High Weald. Natural England was also concerned about the considerable amount of development proposed in the environs of Pevensey Levels Special Area of Conservation (SAC)/ Ramsar site (within 500m-1km). These sites drain directly into the Pevensey SAC and Ramsar site. Applications for the sites should be considered together to fully inform cumulative impacts from such a large quantum of development on the international designations. A masterplanning strategy should also be adopted to avoid impacts and seek opportunities to secure a joined-up approach to SuDs and Green Infrastructure.

N.16 The Council also consulted neighbouring Councils and other Strategic Statutory Partners, Town and Parish Councils, Local Organisations and the Local Community.

N.17 Key issues raised in the consultation included:

- ❑ **Spatial Strategy and Growth Options**
  Concern was raised by several respondents with regard to the Spatial Strategy and Growth Options, particularly the failure to meet the identified housing need for the District by approximately 4,000 homes. Conversely concern was also raised about the potential impact of development upon the rural nature of the District, the designations for landscape and nature, and the poor provision of public transport.
- ❑ **Transport and Accessibility**
  National Highways provided detailed comments on the impact of the Local Plan upon the Strategic Highway Network as well as the Transport Modelling needed to assess proposals. Various responses also raised the need to strengthen the use of sustainable modes of transport through the plan to reduce the related impacts upon climate change.
- ❑ **Frant and Horam**
  Several respondents considered the proposed allocations in Frant and Horam to be inappropriate and that options should be considered without these allocations. The inclusion of allocations in these locations has been reviewed as part of the Spatial Strategy review.
- ❑ **Other Site Allocations**
  A range of other site allocations received comments either in terms of objection or as a result of additional information made available by developers, which may alter the results of assessment. Concern was also raised regarding the accuracy of the assessments and some responses being contradictory.
  A summary of the responses is set out in the **Appendix 3 of the Regulation 18(2) SA Report, 2024**, including a response to the issues raised from WDC and any proposed changes to the SA.

SA Report - Regulation 18(2), January 2026

N.18 The Regulation 18(2) SA Report was issued for consultation alongside the 'Focused Review' of the Local Plan in February 2026 until March 2026. A total of over **3,000 responses** were received, with over 160 responses in relation to the SA report specifically. Some of the responses made on other areas of the Local Plan, have implications for the SA and have been taken into account in the Regulation 19 Local Plan and SA. The full responses to the Draft Local Plan Regulation 18(2) Consultation can be found on the Council's website as well as the **Council's Consultation Statement for the Regulation 19 Local Plan**, which covers issues relating to the Local Plan and SA, in particular: the proposed Spatial Strategy; Housing and Employment need; and Draft Site Allocations.

N.19 Responses were received from the Statutory Consultees; Natural England and Historic England. No response was received from the Environment Agency.

N.20 The key issues raised by the Statutory Consultees, infrastructure providers and Neighbouring Authorities are set out below and are summarised in **Appendix 3** of this document:

- ❑ **Historic England**
  Historic England has provided general comments at this stage including the need to provide a Heritage Conservation Strategy to help inform the selection of Site Allocations. A Heritage Strategy has now been prepared, which has been used to inform the update to the Local Plan and SA.
- ❑ **Natural England**
  Natural England has reiterated its concerns raised in 2024 and remains concerned about some housing site allocations that the Council has retained, revised or added as new sites in the Plan relating to three key impact areas:
  - ▶ Sites that impact on the purposes of designation of the High Weald National Landscape
  - ▶ Sites that contain areas of priority habitats and/or ancient woodland
  - ▶ Sites that are very close to and/or grouped with other sites near to Pevensey Levels Special Area of Conservation (SAC) and Ramsar site.

  It is recognised that the evidence base was not complete at the time of publication of the Draft Plan, however, if the Council is unable to demonstrate with reasonable certainty that all adverse impacts on designated sites can be avoided or fully mitigated, Natural England advises relevant sites should not proceed to the Regulation 19 stage. Furthermore, sites which constitute 'major development' must provide robust evidence on how the tests identified in NPPF para. 190 a-c have been met.

Natural England would also like to see the Regulation 19 Plan show how allocations will avoid or fully mitigate landscape impacts by using the SA evidence to refine site boundaries, secure landscape-led design, and assess cumulative effects where clusters of sites risk altering rural character. The landscape aspects of the SA would also benefit from demonstrating that any allocations brought forward meet NPPF requirements and the enhanced statutory duty to conserve and enhance protected landscapes.

❑ **National Highways**

National Highways has raised concerns about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN). In particular, the A27 and the A259, which cross the southern part of the District from east to west, to the north of the adjacent Eastbourne Borough Council (EBC) area.

WDC references recent and planned highway improvements on the A27, including the A27 East of Lewes scheme and the A27 Lewes to Polegate scheme. The Department for Transport published the Road Investment Strategy (RIS)3 (2026-31) on 26 March 2026. The A27 Lewes to Polegate scheme is not mentioned in RIS 3. The development/study work has paused and it is not known at this stage whether it will become part of a programme in future RIS periods.

Based on the interim Shared Transport Evidence Base (STEB), the level of impact is still likely to be considered significant for each of the alternative New Growth Options, with highway link and/or junction capacities significantly exceeded on key parts of the network, including:

- Sections of the single carriageway A22 corridor and junctions north from Boship Roundabout to the north of Uckfield
- The A27 (SRN) and A2270 corridors and key junctions around Polegate and south into Willingdon and Eastbourne
- Constrained sections of the A26 corridor in and around Crowborough.

❑ **South East Water**

Following a review of the latest housing forecast figures SE Water has identified that in some areas it is challenging to accommodate additional growth beyond what was assumed in the Water Resources Management Plan 2024 (WRMP24). These are areas where there is limited or no planned available supply-demand surplus. The WRMP24 was prepared using housing trajectory data in 2023 and is based on housing figures derived from best available information published at the time. Consequently, the plan does not reflect the significant uplift in the Objectively Assessed Housing Need (OAHN) that is now driving draft Local Plans.

In the Wealden area, it is unlikely SE Water would be able to accommodate growth exceeding the WRMP24 forecast assumptions throughout the planning period. Within the WRMP24, South East Water has assumed a total of 12,013 dwellings across the Local Plan period. However, the growth forecast for the Water Resources Management Plan 2029 (WRMP29) will be updated over the next couple of years, which is an opportunity to ensure the updated housing growth targets can be supported in the next plan.

The report, 'Water Ready: A report to inform HM Government's roadmap for water efficient new homes' 2024, which aims to inform the Government's roadmap for water-efficient new homes sets out a roadmap to target lower per capita consumption for new housing in water-stressed areas such as Wealden, aiming for **90 litres** per person per day by 2030, and **80 litres** by 2035. SE Water fully supports this ambition and encourages local authorities to adopt these targets within strategies where possible.

❑ **Neighbouring Authorities**

Detailed responses were received from the following Local Authorities, which have been taken into account in the revised SA and are considered as part of the Consultation Statement for the Regulation 19 Local Plan.

- Brighton & Hove City Council
- East Sussex County Council
- Kent County Council
- Rother District Council
- South Downs National Park Authority
- Surrey County Council
- Tonbridge & Malling Borough Council
- Tunbridge Wells Borough Council
- West Sussex County Council.

N.21 Specific issues raised by others respondents in relation to the SA included:

❑ **Spatial Strategy and Housing Need**

Concerns were raised that there was a lack of clarity regarding the options presented within the draft 'Focused' Wealden Local Plan, Regulation 18(2), February 2026 (2 options) and their relationship to those presented in the SA Report (4 options).

Several of the respondents with development interests in the District, considered that the Options for growth set out in the SA were not reflected adequately in the Draft Local Plan and that the preferred options, as presented, did not meet the housing need requirements for the District or address the housing need of the neighbouring authorities.

Conversely, many respondents from the local community considered the proposed quantum of development for housing and employment to be too high given the rural nature of the District, the designations for landscape and nature, and the poor provision of public transport.

The draft 'Focussed' Local Plan, provided a Spatial Strategy which sought to deliver **16,609 (net) dwellings or 977 dwelling per annum and 159,530 sqm of employment floorspace** over a Plan period from 1 April 2025 to 31 March 2042.

The Regulation 18(2) SA considered four spatial options, which were tested as 'reasonable alternatives'. Two options considered higher levels of growth than the options set out in the Local Plan to test the housing and employment need identified for the District. The spatial options were drawn up prior to the SA of the strategic and smaller sites and it was recognised that they may be subject to change following consideration of the SA results and further evidence at the Regulation 19 stage. The options for growth assessed in the SA, were then taken into consideration in the draft 'Focused' Local Plan.

The preferred options identified in the SA (Options 3 and 4) included large scale housing and employment sites that were either rejected or considered uncertain in the individual SA site assessments. As a result, the Council chose not to include the rejected or uncertain sites as draft site allocations within the 'Focused' Local Plan, owing to the lack of information available at the time and significant constraints identified.

The 'Focused' Local Plan provided a list of sites **(Table 6)** for both housing and employment uses that did not form draft site allocations within the Plan. The constraints and issues associated with those sites were listed and respondents to the Plan were invited to comment.

A further review of the Options for the Spatial Strategy has been undertaken as part of the Regulation 19 SA, which has taken into account the representations received, as well as evidence and site information that was not available at the Regulation 18 stage. This has resulted in a hybrid Spatial Option, which seeks to meet as much housing and employment need as possible, whilst ensuring the Plan meets its sustainability objectives, including on the environment.

NON-TECHNICAL SUMMARY

Details on the approach taken can be found in the Draft Local Plan and SA Report, Regulation 19 (**Sections 6-11**) and corresponding Topic Papers, which have been updated with the latest information.

❑ **Local Community**

Direct responses to the SA were received from **28 members** of the Local Community. Key issues raised included objections to the following proposed site allocations or option sites:

- FF5 - Bird in Eye (North), Uckfield
- HEA2 - Land SW of Ghyll Road, Heathfield
- HEA6 - Land in Cross in Hand
- HEL2 - Park Farm, Hellingly
- HOR6 - Coxlow Farm, Horam
- LH1 - Land at Owlsbury Farm, Little Horsted
- OEH1 and OEMP1 - Land at Laughton Park Farm, Halland
- OEMP4 - The Ashdown Business Park extension
- POL3 - Shepham Lane, Polegate
- UCK2 - Horstedpond Farm, Uckfield
- UCK11 - Whitehouse Farm, Budletts Common, Maresfield, Uckfield, Buxted
- WES5 - Sharnfold Farm, Stone Cross
- WES7 - Land at Peelings Lane, Westham

Other issues included:

- conflict of proposed site allocations with Spatial Strategy
- need to prioritise brownfield development / regeneration
- size of allocations
- scale and location of development
- availability of evidence
- impacts upon landscape, in particular the HWNL and SDNP
- ecology
- heritage
- water and flood risk
- environmental and infrastructure constraints
- transport impacts
- cumulative impacts of development.

❑ **Town & Parish Councils and Organisations**

Responses were received from **25 Town and Parish Councils**; **44 Other Organisations** and **64 Developers & Agents**:

Key issues raised included:

- Consultation process not fit for purpose
- General support for affordable housing
- Transport and access issues, particularly A22
- Lack of credible, funded and deliverable vision-led transport strategy
- 20 min neighbourhoods
- Reliability of evidence base
- Impact on Rural Character & Landscape, including HWNL
- Brownfield first approach
- Development boundaries
- Coalescence
- Environmental & Ecological impacts
- Water supply and sewage treatment
- Flood Risk & Drainage
- Infrastructure capacity
- Scale, Deliverability & Viability of large schemes
- Spatial Strategy of quantum versus location not appropriate
- More development appropriate to NE and S of District
- Cumulative Impacts.

❑ **Site Allocations**

The responses to the consultation included numerous comments on the draft site allocations. The site allocations have been reviewed as part of the revised SA to respond to the representations and findings from the new and updated evidence. A significant number of objections were made to the following site allocations, in relation to:

- **Ashdown Business Park -** the scale and location of development, landscape and character of the area, transport and pollution.
- **Coxlow Farm, Horam -** the scale and location of development, landscape and character of the area, and appropriateness of an allocation of this size in a tier 3 village was raised.
- **East Hoathly -** the two strategic sites Laughton Farm and Hesmonds Stud. The impact on the character of landscape of the existing settlements, scale and location of development including coalescence, transport & access, infrastructure and biodiversity / ecology.
- **Frant -** the collection of site allocations at Frant. The cumulative impacts of development, particularly on the Landscape and HWNL designation as well transport, infrastructure and services.
- **Owlsbury -** the scale of the development and its impact upon the transport infrastructure, access, biodiversity & ecology, landscape, water and flood risk, distance from Uckfield.

❑ **Policies**

Responses were also received in relation to the draft policies including the following issues:

- Spatial Strategy not appropriate
- Housing and Employment Need not appropriate
- Coastal Change Management Area
- 20 minute neighbourhood - appropriateness for WDC
- Failure to prioritise brownfield land
- Protection of Pevensey Levels Hydrological Area
- Quantum of employment / retail provision in town centres
- Protection of social infrastructure
- Heritage.

Regulation 18(2) Consultation Key Findings

N.22 In summary the consultation responses expressed concern about the following key issues:

- ❑ Spatial Strategy does not meet the identified housing and employment need for the District
- ❑ The Spatial Strategy proposes too much development and impacts upon - landscape; ecology; HWNL; SDNP; transport & access; infrastructure; water & sewerage.
- ❑ The proposed strategy does not address the needs of Neighbouring Authorities
- ❑ The lack of clarity between the Options presented in the draft 'Focused' Local Plan Review and the SA
- ❑ Infrastructure Capacity and Provision
- ❑ Strong Objection to Strategic Site Allocations including - Owlsbury Farm; East Hoathly allocations; Frant allocations; Ashdown Business Park; Land at Peelings Lane.

N.23 The Options did not consider the housing need from the neighbouring authorities at the Regulation 18 stage as the housing numbers from the authorities had not been published, and the available sites did not allow for significant additional provision above the District's need. Further consideration has been given to the neighbouring authorities housing and employment need in the review of the Spatial Strategy and Growth Options, alongside the updated evidence base and responses to the consultation.

N.24 A summary of the Regulation 18(2) SA consultation responses can be found at **Appendix 3** of this report as well as the **Council's Consultation Statement for the Regulation 19 Local Plan**, which includes the representations on all the site allocations and individual plan policies.

NON-TECHNICAL SUMMARY

What is this Report?

N.25 This report provides the findings of the Regulation 19 SA of the Local Plan and sets out the key stages and tasks of the SA process. **Stage A** - the Scoping Report was completed in 2024.

N.26 The **Regulation 19 SA Report** addresses **Stages B to D** of the SA process:

- **Stage B** - 'Developing and Refining Options and Assessing Effects'
- **Stage C** - 'Preparing the Sustainability Appraisal Report')
- **Stage D** - 'Consultation on Plan and SA Report'

Appendix A1 signposts where the specific requirements of the regulations can be found within the SA reports.

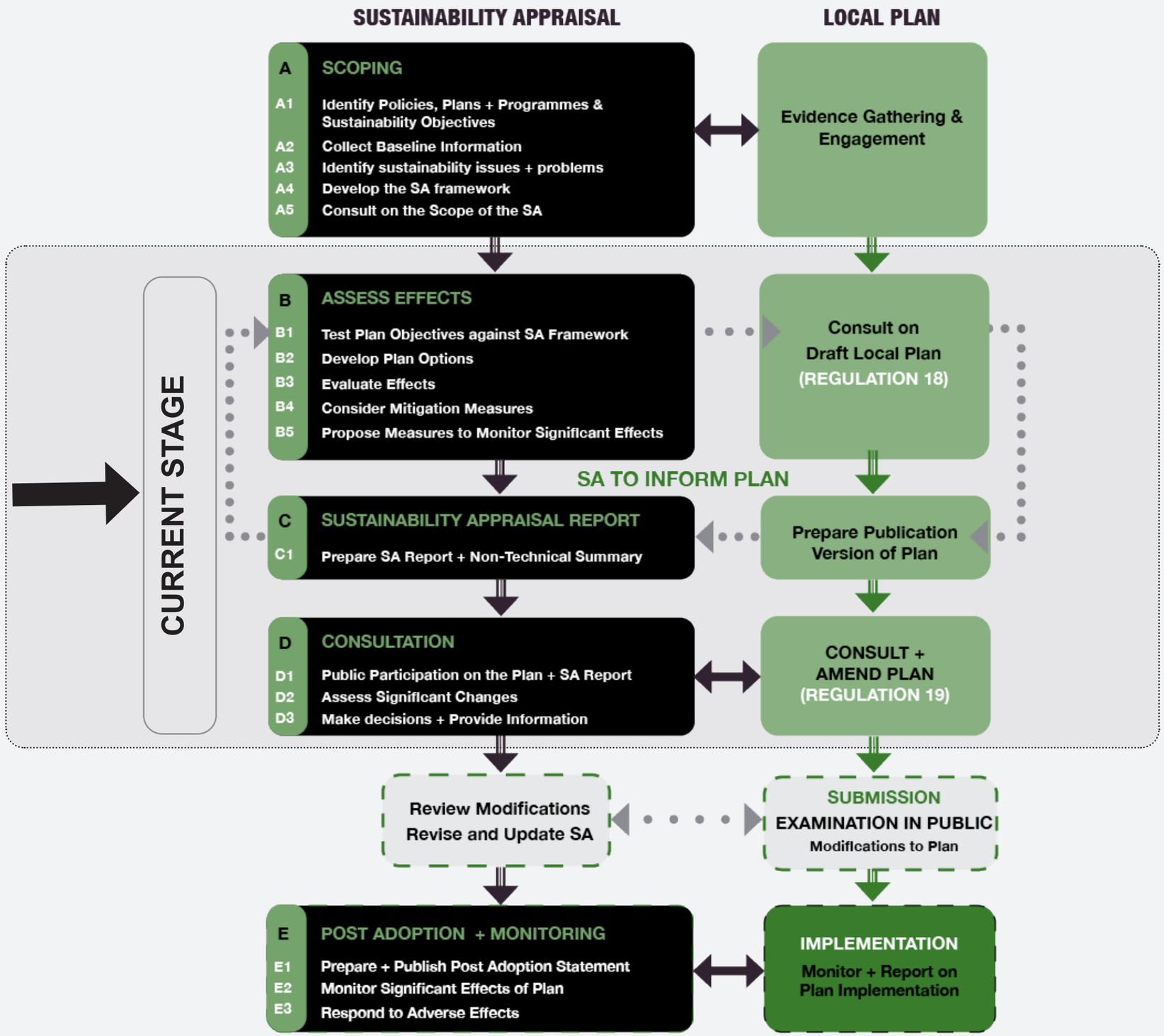


Figure N1: Stages within the SA process and relationship to the Local Plan preparation

NON-TECHNICAL SUMMARY

Method of Assessment

N.27 The regulations require the assessment to identify, describe and evaluate the likely significant sustainability effects of the Plan. When determining the likely significant effects on the environment, the SA should include the following issues:

- ❑ Biodiversity
- ❑ Population
- ❑ Human health
- ❑ Fauna and flora
- ❑ Soil
- ❑ Water
- ❑ Air
- ❑ Climatic factors
- ❑ Material assets
- ❑ Cultural heritage including architectural and archaeological heritage and landscapes.

N.28 The assessment should also consider the inter-relationships between the effects and the decision-making criteria set out in the SA Framework. The SA Framework sets out the Sustainability Objectives and Indicators identified at the Scoping Report stage, which are used to carry out the assessment and can be found in **Chapter 4** of the SA report.

N.29 The assessment must also assess:

- ❑ the probability, duration, frequency and reversibility of the effects
- ❑ the cumulative nature of the effects
- ❑ the risks to human health or the environment (e.g. due to accidents)
- ❑ the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)
- ❑ the value and vulnerability of the area.

N.30 The impacts have been scored as follows:

Sustainability Appraisal Impacts	
Major Positive	
Minor Positive	
Uncertain	
Minor Negative	
Major Negative	
Not Significant	

N.31 A commentary accompanies the matrix to explain the reasons for the results. The results are assessed in terms of short, medium and long-term effects (5, 10 and 15 years) including permanent and temporary effects. The assessment of alternative options includes a summary of the reasons for selection and rejection to provide a clear audit trail and document a transparent approach to the assessment.

N.32 The SEA Directive also requires an assessment of secondary, cumulative and synergistic effects. Collectively these effects are called cumulative impacts. Cumulative impacts may arise, for example, where several developments each have insignificant effects but together have a significant effect or where several individual effects have a combined effect. Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity.

Options Considered in the Local Plan

N.33 Under the SEA Regulations, there is a requirement to consider 'reasonable alternatives' when undertaking the assessment and to set out an outline of the options considered and the reasons for their selection or rejection. Options have been considered in the development of the draft Local Plan for the Spatial Strategy; the Local Plan Policies; and Site Allocations. The **Initial SA Report 2024 - Appendix 8**, sets out 'reasonable alternatives' considered in the development of the Plan's policies.

N.34 The option of 'do nothing' or 'no new plan' was not considered a 'reasonable alternative' as it would not address the need to plan for the required housing and economic growth in the District or address recent changes in planning and environmental legislation and guidance.

N.35 Further refinements to the Options and Policies have been made as part of Regulation 19 Local plan and SA. Details of the Options considered for the Spatial Strategy at the different stages of the Plan development are provided overleaf.

NON-TECHNICAL SUMMARY

Regulation 18 (1) Spatial Options

N.36 The Spatial Strategy is based upon focusing growth in and around sustainable settlements (including strategic extensions) and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Tunbridge Wells). The strategy also seeks to limit growth in the sustainable settlements that are located within or washed over by the High Weald National Landscape (HWNL) designation.

N.37 Seven Options for growth (**A-G**) were considered at the **Regulation 18(1) Stage, 2024**, which were consulted upon alongside the SA and summarised below. **Option F** was considered the Preferred Option at this stage, although it was concluded that **Options B, D and G** should be included for further consideration alongside **Option F** at the next stage, once further work had been carried out, to provide greater certainty in determining the effects. **Options A, C and E** were not considered suitable and were not included for further consideration.

N.38 It should be noted at this stage in the process the housing need was projected to be **19,800 net dwellings** and the employment need **188,894 sqm** between 2023 and 2040, substantially lower than the current need that has now been determined.

N.39 A summary of the results is provided opposite and the full results are set out in the **Regulation 18(1) SA Report, 2024**.

Spatial Option A [c.20,250 net dwellings]

To maximise growth in all locations within the District to meet the Council's housing and employment needs requirement.

Spatial Option B [c. 15,750 net dwellings]

To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells).

Spatial Option C [c. 15,000 net dwellings]

To focus growth outside of the High Weald National Landscape, within sustainable settlements in the Low Weald (i.e. Uckfield, Hailsham, Polegate and Willingdon and other villages).

Spatial Option D [c. 15,500 net dwellings]

To focus growth on the delivery of new strategic extensions at existing sustainable settlements. Continue to support growth through windfalls at those settlements.

Spatial Option E [c. 21,200 net dwellings]

To maximise growth in all locations within the District to meet the Council's housing and employment needs requirement and to meet a small proportion of Eastbourne's unmet housing needs.

Spatial Option F [c. 15,750 net dwellings]

To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells), with limited employment growth (i.e. without Ashdown Business Park).

Spatial Option G

Combined option of B and D.

Spatial Option A (REJECT)

Meets in excess of the housing need (**c.450** more). Meets employment need. Major negative impacts of growth on the landscape of Wealden (including the High Weald National Landscape). Significant highway constraints along the SRN/MRN.

Spatial Option B (SELECT)

Does not meet overall housing need (**c. 4,000** homes less). Meets the full employment needs of the District and improves town and village centres through new jobs and homes. No major negative impacts. Impact of Ashdown Business park uncertain.

Spatial Option C (REJECT)

Does not meet overall housing need (**c. 4,800** homes less - the least of all options). Meets the full employment needs of the District and improves town and village centres through new jobs and homes within the Low Weald. No major negative impacts.

Spatial Option D (SELECT)

Does not meet overall housing need (**c. 4,300** homes less). Meets the full employment needs of the District and improves town and village centres through new jobs and homes. No major negative impacts. Impact of Ashdown Business Park and Owlsbury Housing site uncertain.

Spatial Option E (REJECT)

Meets in excess of the housing need (**c. 1,400** more). Meets employment need. Major negative impacts of growth on the landscape of Wealden (including the High Weald National Landscape, historic environment and pollution). Significant highway constraints along the SRN/MRN. mitigation may not be achievable for all sites.

Spatial Option F (SELECT - PREFERRED)

Does not meet overall housing need (**c. 4,000** homes less). Does not meet the employment need in full (c.68,000 sqm less) but will continue to improve town and village centres through new jobs and homes. No major negative impacts.

Spatial Option G (SELECT)

Does not meet overall housing need (**c. 2,000** homes less). Meets the employment need in full and will improve town and village centres through new jobs and homes. No major negative impacts. Impact of Ashdown Business Park and Owlsbury Housing site uncertain.

NON-TECHNICAL SUMMARY

Regulation 18 (2) Options

N.40 Following the publication of the Regulation 18(1) Draft Local Plan and SA, key changes occurred which needed to be taken into account in the revised strategy, as a result of the revised NPPF (December 2024):

- **Housing Need Calculation** - increase in the housing need for the District.
- **Transport Modelling** - a move to a 'vision and validate' approach, instead of 'predict and provide'.

N.41 The representations to the **Regulation 18(1)** (**Appendix 3**) were also taken into account, several of which identified the need for further Housing and Employment Allocations, as well as updates to the evidence base. Concern was also raised that the Plan was proposing too much development given the rural nature of the District, the designations for landscape and nature and the lack of public transport provision.

N.42 A further SA Report, **Regulation 18(2) SA January 2026**, was prepared in support of the 'Focused' Review of the Local Plan (Regulation 18(2)), which built upon the findings of the Regulation 18(1) SA and the identified **Preferred Option (F)** as well as the options identified for further consideration (**Options B, D and G**) for the proposed Spatial Strategy.

Regulation 18(1)
Spatial Option F (Preferred Option)

To focus growth in and around all sustainable settlements (as defined in the Sustainable Settlement Strategy), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells), with limited employment growth (i.e. without Ashdown Business Park).

N.43 Four spatial options were considered as part of the **Regulation 18 (2) Local Plan**, which were tested as 'reasonable alternatives' for the purposes of the SA. The options were drawn up prior to the SA of the strategic and smaller sites and it was recognised that they may be subject to change following consideration of the results and further evidence at the Regulation 19 stage. A summary of the key components of the options is summarised opposite.

N.44 Spatial Options considered at this stage included:

OPTION 1:

Residential Development in / adjacent to Sustainable Settlements

15,612 homes (63% Housing Need)
+ employment 175,421 sqm (82% Employment Need)

OPTION 2:

Small & Medium Sites around Sustainable Settlements

19,011 homes (77% Housing Need)
+ employment 205,421 sqm (97% Employment Need)

OPTION 3:

Small & Medium Sites + Significant Extensions to Existing Settlements

22,211 homes (90% Housing Need)
+ employment 262,421 sqm (124% Employment Need)

OPTION 4:

Small & Medium Sites + Hesmonds Stud + Laughton New Villages

24,911 homes (100.6% Housing Need)
+ employment 315,921 sqm (149% Employment Need)

N.45 At this stage in the process **Spatial Options 3 and 4** were considered the best performing Options with regard to meeting the identified need for housing and employment of the District. Although Options 1 and 2 were considered unsuitable in respect of meeting the housing and employment need, other positive elements of these options were identified, which have been considered in finalising the Spatial Strategy.

N.46 The above options have been examined further at the Regulation 19 stage of the Local Plan alongside further evidence, which provides greater certainty in determining the effects. The responses to the consultations and additional information on development proposals have also been taken into account.

N.47 Further information on the above options is provided in **Sections 6-13 of the Part 1: SA Report - Regulation 18(2), January 2026.**

Regulation 19 Options

N.48 The Regulation 19 Local Plan Spatial Strategy has been refined following the Regulation 18(2) consultation. Updates to the evidence base have also been made including:

- ❑ Brownfield Land
- ❑ Climate Change
- ❑ Economy
- ❑ Habitats Regulations Assessment (HRA)
- ❑ Heritage
- ❑ Housing & Population Growth
- ❑ Infrastructure
- ❑ Landscape & Biodiversity
- ❑ Transport
- ❑ Viability
- ❑ Water & Flood Risk.

N.49 Further information on the updates to the evidence base is set out in **Section 3 - Baseline Information** of the SA Report. The Regulation 19 Spatial Option is broadly based on Option 3, as identified at the Regulation 18(2) stage. The quantum of development has been reduced to take into account representations made on the consultation and the new evidence identified above but provides an increase on the need identified in the Focused Review of the Local Plan.

N.50 The potential for an alternative Option with a more reduced quantum of development has also been considered. Housing allocations were reviewed, in particular to consider the scope for a lower amount of development in the parishes of Frant, Horam and Uckfield/Maresfield. A lower quantum of housing development was not considered appropriate as a reduction in the scale of growth would result in a reduction in infrastructure provision and raise issues for the viability of proposals. Furthermore, a reduction would result in an even greater shortfall in meeting the housing needs of District.

N.51 An over estimate of the amount of employment need was made at the Regulation 18(2) stage, including provision made for Eastbourne Borough Council, which is no longer required. In addition, the SA of sites found that the majority of sites along the A22 are not suitable for development. A further reduction in the amount of employment allocations was therefore not considered appropriate as alternative sites had already been ruled out.

N.52 The specific figures for each site allocation have been reviewed and revised based on the evidence available. Some new sites have been added which were submitted after the Regulation 18(2) consultation. Sites considered uncertain or which are no longer supported by the evidence have been removed.

N.53 Further details are provided in **Sections 8-13** of the SA report.

NON-TECHNICAL SUMMARY

Proposed Site Allocations

N.54 The sites submitted to the Council were initially assessed as part of the SHELAA and sites identified as suitable for development were then assessed as part of the SA. Where sites were identified as suitable under the previous SAs, they have been carried forward for allocation unless planning permission has been granted. Sites which were previously rejected for allocation or sites where the situation has changed have been reconsidered and where appropriate have been subject to further SA alongside any new submissions.

N.55 Information on the sites considered is set out in the following sections of the SA:

- **Regulation 19 SA - Part 2: Parish Site Assessments**
  A summary of site allocations SA by Parish
- **Regulation 19 SA - Part 2: Parish Site Assessments - Appendix A**
  Assessments for new or amended sites
- **Regulation 19 SA - Part 2: Parish Site Assessments - Appendix B**
  An updated list of sites with planning permission or resolution to grant permission
- **Regulation 19 SA - Part 2: Parish Site Assessments - Appendix C**
  An updated list of rejected sites
- **Regulation 19 SA - Part 3: Strategic Site Assessments**
  Further testing of the Strategic Allocations has been carried out against the updated evidence and site information, including 4 new sites.
- **Regulation 18(2) SA - Part 2: Parish Site Assessments Appendix B (January 2026)**
  The detailed SA appraisals for other potential site allocations.
- **Regulation 18 (2) SA - Part 3: Strategic Site Assessments (January 2026)**
  Detailed SA appraisals for potential strategic sites considered for allocation at Regulation 18(2) (SA Report - Section 7).

N.56 Where sites have not been allocated but have positive effects against some SA Objectives (such as housing) it is considered that the negative effects of development cannot be suitably mitigated through the application of the relevant Local Plan policies. Similarly, a negative impact against a sustainability objective does not automatically result in the rejection of a site, providing mitigation measures can minimise any impacts.

Selection & Rejection of Options

N.57 Under the SEA Regulations, there is a requirement to consider 'reasonable alternatives' when undertaking the assessment and to set out an outline of the options considered and the reasons for their selection or rejection. Options have been considered in the development of the draft Local Plan for the Spatial Strategy; the Local Plan Policies; and Site Allocations.

N.58 Further refinements to the Options and Policies have been made as part of Regulation 19 Local Plan and SA. The Preferred Spatial Strategy is based on previous Options considered in the development of the Plan, namely **Option F**, Regulation 18(1) and **Option 3**, Regulation 18(2).

N.59 Following the Regulation 18(2) Consultation on the 'Focused' Review of the Local Plan and supporting SA, the options for the Spatial Strategy were reconsidered in view of the consultation responses, new evidence and the SA of sites. Several Strategic Sites considered previously were rejected as a result of the revised SA, particularly in view of likely impacts upon landscape, townscape, heritage, transport and the perception of coalescence.

N.60 The following sites have therefore been removed as options for the Spatial Strategy, which has significantly reduced the potential to meet the identified housing need within the District:

- Land to north-west of Hempstead Lane, Hailsham (Ref. 825/1310)
- Hesmonds Stud, East Hoathly (Ref. 996/1950)
- Land at Laughton Park Farm (Ref. 1235/1950)
- Land at High Cross Farm, Framfield (Ref. 400/1410)
- Polegate West, Polegate (Ref. 1069/1510 and 204/1510)
- Hempstead Farm (Ref. 1232/1410)

N.61 The Regulation 19 stage has therefore considered two further spatial options, which are refinements of the previous options as set out in **Sections 9 and 10** of the SA report.

N.62 It should be noted that both options fail to meet the housing need for the District or provide for the housing needs of neighbouring authorities. The majority of the authorities in the Housing Market Areas for Wealden are also currently unable to meet their housing need. Wealden's substantial constraints make the balance between protection of the environment and the provision for future needs particularly difficult to achieve.

Spatial Strategy Options

N.63 Two Options have been considered at the Regulation 19 Stage, which incorporate elements of the different Options presented throughout the SA process. Both Options are based around the preferred approach (**Option F**) established at Regulation 18(1), however, the Ashdown Business Park extension has been included in both options.

'To focus growth in and around all sustainable settlements (as defined in the Sustainable Settlement Strategy), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells).' **Option F**

N.64 The Spatial Options considered are therefore variants of **Option 3** presented at Regulation 18(2)**,** although both propose a reduced quantum of development overall to address issues presented in the evidence base.

OPTION 1

N.65 Option 1 proposes **15,728 homes** (67.4% of housing need). This option includes a 25% reduction in the quantum of housing development in the parishes of Frant, Horam and Uckfield / Maresfield in response to issues raised in the consultation responses regarding the potential for cumulative impacts / coalescence with the surrounding settlements, as well as the potential for adverse impacts upon the High Weald National Landscape for the allocations within Frant. A reduction of 25 % in the overall allocations for the areas considered most sensitive to these issues has been made.

N.66 The option includes provision for **197,780 sqm** of employment space or 102% of the estimated need. Ashdown Business Park extension has been included but with a reduced allocation of 45,000 sqm. A further reduction in the amount of employment allocations was not considered appropriate, in order to meet the need for employment space within the District.

N.67 Some new sites have also been considered, which were submitted after the Regulation 18(2) consultation. Other sites have been removed, which were either withdrawn, considered uncertain or which are no longer supported by the evidence.

NON-TECHNICAL SUMMARY

OPTION 2

N.68 Option 2 proposes **16,8333 homes** (71.8% of the housing need) and **197,780 sqm** of employment land. This option does not include a 25% reduction in the overall quantum of housing development in the parishes of Frant, Horam and Uckfield / Maresfield area.

N.69 The development proposed in Frant Parish amounts to 885 homes in total. The proposed development, although within the Parish of Frant, is located within walking distance to Tunbridge Wells a sustainable settlement located outside the administrative boundary of Wealden. It is therefore expected that future residents are likely to make greater use of the facilities and services in Tunbridge Wells than Frant, a Tier 4 secondary village. Individual site numbers, however, have been reduced where appropriate to respond to the specific sensitivities of sites identified in the Landscape Character Assessment.

N.70 The quantum of development in Horam (750 homes) has not been reduced in this option. Concern was raised by some respondents that the amount of development proposed in a Tier 3 Primary Village was inappropriate. However, Horam is the only Primary Village, which is relatively unconstrained and does not have transport congestion issues, unlike the other primary villages. Providing development in Horam therefore enables a reduction in development pressure on other lower tier settlements, which are less suitable for large scale proposals, whilst providing for housing need and necessary supporting infrastructure.

N.71 A large quantum (2,434 net dwellings) of development is proposed around Uckfield, a Tier 1 settlement, and the most sustainable tier in the hierarchy. Significant opposition was raised at the Regulation 18(2) stage to the Owlsbury Site, which was proposed in the draft Focused Local Plan review for 1,500 homes. The proposals have been reviewed in view of representations and the new evidence for the Local Plan, as well as supporting information submitted as part of the live planning application. As a consequence, the allocation has been reduced in size from c.1500 homes to c.1300 homes. This reduction removes the most sensitive parts of the site from development in terms of landscape, ecology and heritage.

N.72 Further reductions have also been made to other specific site numbers with the exclusion of some sites in their entirety, which it was considered could not be supported by the evidence available

N.73 Some new sites have also been considered, which were submitted after the Regulation 18(2) consultation. Other sites have been removed, which were either withdrawn, considered uncertain or which are no longer supported by the evidence.

Option 1 - Small and medium sites of the District with significant extensions to existing settlements (67.4% Housing Need, 102% employment need)

1.1.74 **Option 1** provides housing provision which is 32.6% below the District's Housing need, a significant shortfall at a time when there is a housing crisis, which will also have a negative impact upon the affordable housing provision. The District's employment need will be met which will have a positive impact for employment and economic growth. The option is likely to reduce the cumulative impact of development to some extent, particularly the environmental impacts but will also result in less beneficial social and economic impacts, as a result of more constrained development. The reduction in development is likely to have a negative impact upon the viability of proposals and the delivery of substantial infrastructure, which will have negative impacts for residents and the prosperity of the District.

It is therefore recommended that Option 1 is not taken forward as the proposed Spatial Strategy.

Option 2 - Small and medium sites of the District with significant extensions to existing settlements (71.8% Housing Need, 102% employment need)

1.1.75 **Option 2** provides 16,753 homes (71.8%) of the District's housing need, which is still substantially below (28.2%) the District's identified housing need. The strategy has reduced the level of housing development to respond to new evidence and consultation responses in an effort to balance the likely impact upon the natural environment, protected landscapes and the countryside, alongside necessary growth for the District. The proposed quantum of development will enable a positive impact for landscape and the character of the area, whilst ensuring that the viability of development proposals is not compromised. The District's employment need will be met in full, which will have a positive impact for employment and economic growth.

1.1.76 The option is likely to have greater environmental impacts overall, particularly with regard to the loss of greenfield land but will also have more beneficial social and economic impacts, as a result of less constrained development. The evidence has established that suitable mitigation measures are possible to minimise any likely negative impacts.

It is therefore recommended that Option 2 is taken forward as the proposed Spatial Strategy.

PROPOSED SPATIAL STRATEGY

Small & Medium Sites + Significant Extensions to Existing Settlements

ALL SITES IN REG 18(1)
+
UPDATED SITES / NUMBERS SINCE REG 18(2)
+
RECONSIDERS DISMISSED SITES FROM REG 18(2)
+
UCKFIELD / FRAMFIELD / MARESFIELD / LITTLE HORSTED (2,434 HOMES)
+
FRANT (885 HOMES)
+
HORAM (750 HOMES)
+
ASHDOWN BUSINESS PARK EXTENSION (45,000 SQM)
+
NORTH OF POLEGATE (63,000 SQM)

TOTAL HOMES = 16,753 (71.8% need)
TOTAL EMPLOYMENT = 197,780 sqm (102% need)

NON-TECHNICAL SUMMARY

Plan Policies

N.77 The new Draft Local Plan contains the policies that will implement the Plan and help achieve its objectives. A list of the proposed policies is set out in **Regulation 19 SA - Part 1 - Appendix 4.**

N.78 The option of 'do nothing' or 'no new plan' was not considered a 'reasonable alternative' as it would not address the need to plan for the required housing and economic growth in the District or address recent changes in planning and environmental legislation and guidance.

N.79 All the policies within the Draft Local Plan (except the site allocations which have been assessed separately) have been assessed against the sustainability objectives and a appraisal of the policies is contained within the **SA Report Part 4: Policy Assessments, Regulation 19, September 2026.**

N.80 The previous appraisals can be found in the **Initial SA Report 2024, Appendix A8**. Reasonable alternatives (options) were considered where appropriate for each of the policy areas within the Draft Local Plan and the reasons for selecting or rejecting the approaches provided. Most of the reasons for rejecting options were because the policy options did not comply with the NPPF or reflect local circumstances.

N.81 The majority of the Local Plan policies recorded a major or minor positive impact within the SA. A few areas of uncertainty were identified across the policies at the Regulation 18 stage, which have been addressed at this stage of the Local Plan either through the consideration of further evidence or the identification of suitable mitigation measures.

N.82 More detailed assessment of alternatives has been carried out in relation to the Spatial Strategy (**Regulation 19 Part 1 SA Report, 2026 - Sections 8-11**) including the proposed Housing and Employment numbers.

N.83 The Council has considered its evidence base on coastal change management, along with the interpretation of national policy and guidance. WDC considers that the Shoreline Management Plan provides strong enough assurances that the hold the line approach will be maintained for a substantial amount of the plan period to 2042, and that this will continue beyond to protect residents, businesses and infrastructure into the future. As such the CCMA policy has been removed as it is not required.

N.84 The wording of the policies has been modified in some instances or a new policy introduced, which is set out in more detail in **Section 12** of the SA report. The revised policies have been subject to further SA where required. Overall, the policies are considered to perform well against the SA framework.

Cumulative Effects

N.85 The SEA Directive requires that cumulative and synergistic effects are considered when identifying likely significant effects. These effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the Plan (e.g. noise, dust and visual impact) have a combined effect.

N.86 The SA Report has considered how the different policy areas and proposed site allocations of the Plan affect the various environmental, social and economic elements identified in the sustainability objectives, including the likely cumulative effects. It is also important to consider the effects of the plan implementation in itself and when combined with other plans i.e. neighbouring authorities.

N.87 An initial assessment of the cumulative impacts was carried out in support of the Plan at **Regulation 18(1)** and is included in the **Initial SA Report 2024 - Appendix A13.** Consideration of the cumulative impacts of the individual site assessments was also included within the assessments **Regulation 18(2) SA - Part 2: Parish Site Assessments, Appendix B** and **Part 3: Strategic Site Assessments** but it was recognised that further consideration of cumulative effects would be necessary at the Regulation 19 stage once further evidence had been prepared**.**

N.88 The cumulative impact assessment has been updated as part of this report and is set out in **Section 13** of the **Regulation 19 Part 1 SA Report, 2026**. The assessment now includes consideration of the impact upon neighbouring authorities. The impact on neighbouring authorities was not included at the Regulation 18 stage as the relevant information from the authorities was not available.

N.89 The assessment shows that the majority of the Plan Policies perform well against the Sustainability Objectives. However, the assessment of the Spatial Strategy Options shows there is still a degree of uncertainty as well as likely minor negative impacts, which will need to be addressed through mitigation measures identified within the specific Plan policies at the planning application stage.

Mitigation Measures

N.90 The SA Regulations require that the SA process should consider ways of mitigating adverse effects and maximising beneficial effects and propose measures to monitor the significant effects of implementing the Plan.

N.91 Mitigation measures have been considered throughout the assessment process. The Local Plan policies will need to be taken into consideration with regard to all planning applications for development, many of which identify specific measures for mitigation. Details of the specific mitigation measures which could be applied are set out in the assessments of the policies and sites included in the Appendices.

N.92 A summary of key mitigation measures identified within the Plan policies is set out in **Section 14** of the **Regulation 19 Part 1 SA Report, 2026** as well as specific measures for the Site Allocations.

NON-TECHNICAL SUMMARY

Uncertainties & Risks

N.93 SA is a Strategic Environmental Assessment tool for predicting the '**likely significant effects**' of the Plan. The assessment is a high level, objective process and the prediction of effects relies upon an evidence based approach, which incorporates expert judgment. When predicting effects, it is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and / or the success of mitigation measures over a long timeframe.

N.94 The assessments that have been undertaken in this report are based on the best publicly available information and every attempt has been made to predict effects using this information as accurately as possible. The 'reasonable alternatives' have been assessed using the same method. Where detailed or up-to-date data is unavailable, then reasonable assumptions have been made to inform the assessments.

N.95 At the Regulation 18 Stage, uncertain impacts were identified in relation to several of the Sustainability Objectives as a result of evidence which still needed to be prepared, as well as information regarding the proposed development for site allocations. The Regulation 19 Stage SA of the Local Plan has sought to address any remaining uncertainty identified at the previous stages.

N.96 Specific attention has been given to the uncertain impacts identified when reviewing proposals. Mitigation measures have been provided in more detail as evidence has been finalised. Development proposals vary widely regarding the supporting information provided, which frequently relates to the stage the development is at within the planning process. Further information will need to be provided at the planning application stage, where effects are considered in more detail, to ensure that any potential adverse impacts are suitably addressed.

N.97 There are also risks largely outside the Council's control, which could have an impact on development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues has been included, as far as possible, within the monitoring and implementation plan.

Monitoring

N.98 The Council currently produces an **Authority Monitoring Report (AMR)**, which is the main mechanism for assessing the performance of the adopted planning policies. The AMR sets out how the Council's planning policies have been implemented and whether the planning policies are addressing the required issues.

N.99 The indicators set out in the Sustainability Appraisal Framework will be incorporated into the AMR to enable the specific impacts, which relate to the delivery of sustainable development, to be assessed in the future. If the AMR identifies any changes that should be made to the policies, such changes will be reviewed, and a further SA undertaken if it is considered necessary.

Next Steps

N.100 The Council will consider all the consultation responses (representations) received during the Regulation 19 stage consultation period and review whether any further amendments are needed to the SA.

N.101 Following the Regulation 19 stage consultation, the Proposed Submission Local Plan and SA will be submitted for Examination in Public (EiP) by an independent Planning Inspector. If any major modifications are identified as a result of the EiP, the Council may need to carry out a further SA of those modifications.

Regulation 19 of Wealden District Draft Local Plan

PART 1 : SUSTAINABILITY APPRAISAL (SA) REPORT

1 Introduction

1.1 What is this document?

1.1.1 This document provides the Sustainability Appraisal (SA) Report for **Wealden District Council's Proposed Submission Regulation 19 Local Plan**. The District's new Local Plan will replace the current set of adopted development plan documents with a new planning framework for the District up to 2042.

1.1.2 The SA Report has been issued for consultation in order to:

- ❑ Ensure that sustainable development has been integrated in the formulation of the Proposed Submission Regulation 19 Local Plan; and
- ❑ Verify that due consideration has been given to social, economic and environmental factors in the plan making process.

1.1.3 To make the document more manageable the report has been split into 4 parts:

- ❑ **Non-Technical Summary**
- ❑ **Part 1 - Sustainability Appraisal Report**
  Introduction; Methodology; Spatial Strategy; Policy Assessment; Cumulative Impacts; Mitigation; Uncertainties & Risks; Monitoring; and Next Steps
- ❑ **Part 2 - Parish Site Assessments**
  A summary of the characteristics of each Parish and the assessments for possible site allocations has been prepared by Parish. The report is also supported by the following Appendices.
  - ▶ **Appendix A** - assessments for new or amended sites.
  - ▶ **Appendix B** - updated list of sites with planning permission
  - ▶ **Appendix C** - updated list of rejected sites.
- ❑ **Part 3 - Strategic Site Assessments**
  26 potential strategic sites have been assessed in more detail, which comprise the larger more complex sites for proposed development.

1.1.4 The SA process is intended to promote sustainable development in plan preparation by assessing the extent to which a Plan and its policies, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The process will also help to ensure that the proposed policies and site allocations provided in the Local Plan are adequate and proportionate.

1.1.5 Public consultation and consultation with the Statutory Consultees (Natural England, the Environment Agency and Historic England) is required as part of the SA process.

1.1.6 This SA Report addresses **Stage B** (Assess Effects), **Stage C** (Preparing the Sustainability Appraisal Report) and **Stage D** (Consultation) of the SA process.

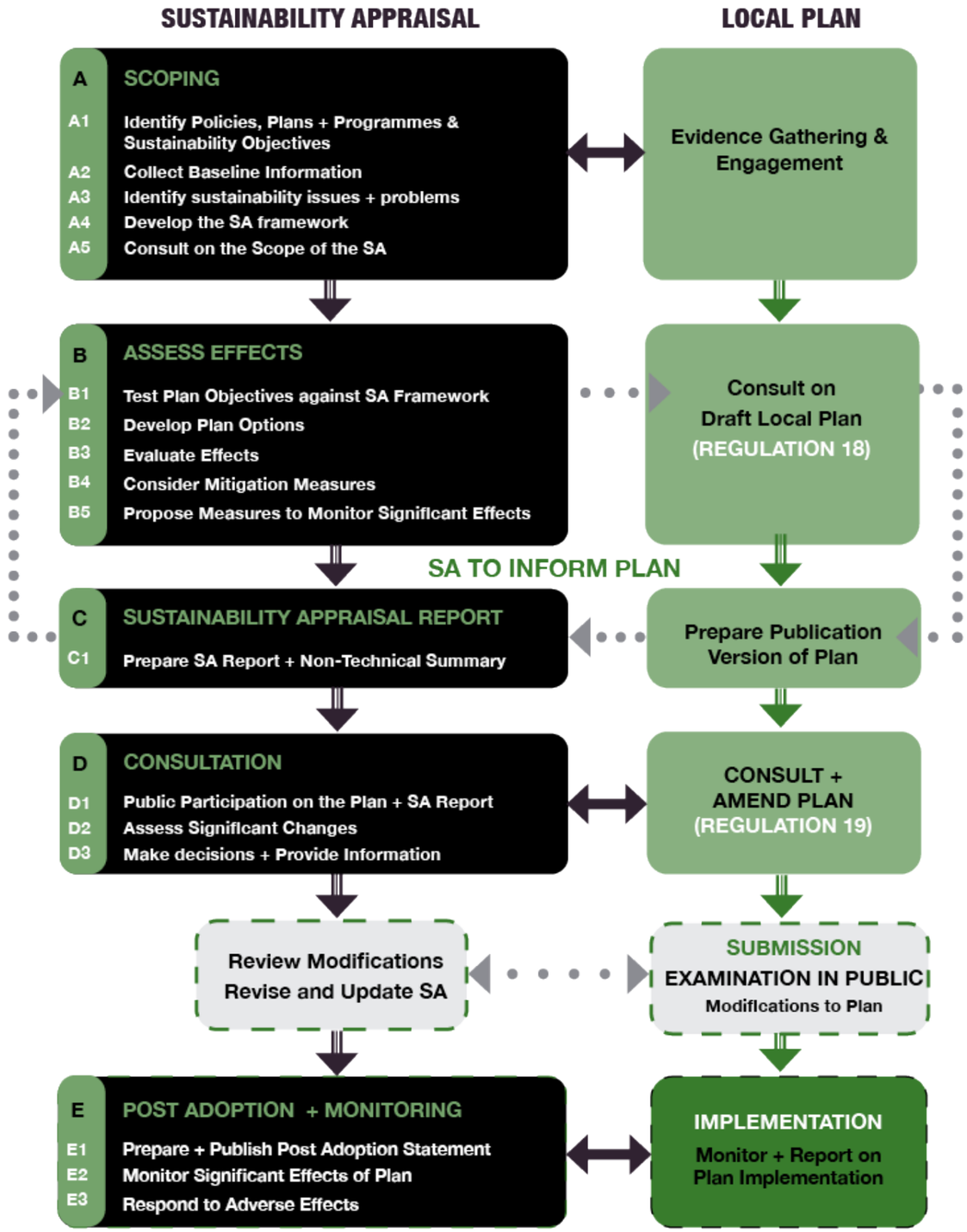


Figure 1.1: Stages within the SA process and relationship to the Local Plan preparation

1 INTRODUCTION

1.2 Why is a Sustainability Appraisal needed?

1.2.1 The Town and Country Planning (Local Planning) Regulations (2012) require Local Plans throughout their evolution to be subject to SA, in accordance with section 19(5) of the Planning and Compulsory Purchase Act 2004. The SA must also show how the requirements of the Strategic Environmental Assessment (SEA) Directive have been met. The Strategic Environmental Assessment EU Directive (2001/42/EC) requires a 'Strategic Environmental Assessment' (SEA) of plans and programmes, including development plans, which is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (2004, Section 12) (commonly referred to as the SEA Regulations).

1.2.2 Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment. Sustainability Appraisals should be carried out in accordance with Government Policy and Guidance the 'National Planning Policy Framework (NPPF) 2024' and 'National Planning Practice Guidance (NPPG)'.

1.2.3 The Local Plan is being prepared under the legacy planning system, which requires the Local Plan to be submitted for Examination by December 2026. The NPPF December 2024 has therefore been used for the development of the Plan, rather than the revised NPPF 2026.

1.2.4 This Report sets out the key stages and tasks of the SA process. **Appendix A1** of this report signposts where the specific requirements of the regulations can be found within the SA reports.

1.3 Background to the Local Plan

1.3.1 The new Local Plan will provide an overarching planning framework for the local area excluding a small area in the south of the District, which forms part of the South Downs National Park. The South Downs National Park Authority has planning powers for its own area.

1.3.2 The plan will replace the current set of adopted development plan documents (the Wealden Local Plan 1998 saved policies, the Core Strategy 2013 and the Affordable Housing Delivery Local Plan 2016) with a new planning framework for the District up to 2042.

1.3.3 The Local Plan will provide a vision for the District as well as a long-term spatial strategy for growth, including the locations where development should take place. The Plan will shape places and spaces, plan, monitor and manage future growth and change within the District. The Plan will be the key planning document against which decisions on planning applications will be assessed and made, unless material considerations indicate otherwise.

1.3.4 The Plan covers a broad range of spatial issues to contribute towards the creation of sustainable communities within the District, including the provision of housing, employment, retail, green and blue infrastructure, environmental and heritage protection and measures to help reduce carbon emissions.

1.3.5 Alongside the Plan, there are a number of Development Plan Documents which provide an overarching framework for managing and monitoring development across the District including:

- ❑ Sustainability Appraisal (SA)
- ❑ Local Development Scheme (LDS)
- ❑ Statement of Community Involvement (SCI)
- ❑ Neighbourhood Plans (Made and Emerging)
- ❑ Supplementary Planning Documents (SPDs)
- ❑ Authority Monitoring Report (AMR)
- ❑ Infrastructure Delivery Plan (IDP).

1.4 Previous Stages of the SA

Stage A - Scoping Report, June 2023

1.4.1 The first stage in the SA process is to produce a Scoping Report (**Stage A**), which sets out the context and scope of the SA in accordance with the Regulations and best practice guidance (**see Figure 1.1, page 1**).

1.4.2 An updated Scoping Report was published for consultation in 2023. Formal consultation was undertaken by the Council in line with regulatory and best practice guidance. The consultees included the Statutory Consultees: Natural England; The Environment Agency; and Historic England, as well as key local stakeholders.

1.4.3 Around fifty responses were received as part of the SA Scoping Report consultation, including the Environment Agency and Historic England. The Council did not receive a response from Natural England at this stage. A summary of the consultation responses is provided in **Appendix A2 - Initial SEA Report, 2024.**

1.4.4 In general, the view was that the Scoping Report provided an appropriate methodology and framework for the Sustainability Appraisal of the Local Plan. The key issues raised related to some changes to the baseline data, in particular Air Quality (Chapter 7) and Water (Chapter 14). The wording for the sustainability objectives and indicators was also refined in response to the consultation to remove any duplication and improve clarity. A number of Plans, Policies and Programmes were also added into Appendix A of the SA Scoping Report.

Stage B - Initial SA Report, Regulation 18(1) March 2024

1.4.5 An Initial Draft SA Report was issued for consultation in 2024 alongside the Draft Local Plan Regulation 18(1). The Initial SA Report set out the key stages and tasks of the SA process.

1.4.6 The SA Report tested the proposed Spatial Strategy including seven growth options (A-G), the site assessments and an appraisal of all the draft policies. Option F was considered the Preferred option but it was recognised that Options B, D and G should also be considered going forward.

1.4.7 The consultation responses expressed concern about the failure of the strategy to meet the identified housing and employment need for the District. Concern was also raised that the Plan was proposing too much development given the rural nature of the District, the designations for landscape and nature, and the lack of public transport provision.

1 INTRODUCTION

Stages B and C - SA Report, Regulation 18(2), January 2026

1.4.8 Following the publication of the Regulation 18(1) Draft Local Plan and SA, key changes occurred which needed to be taken into account in the revised strategy, as a result of the revised NPPF (December 2024):

- **Housing Need Calculation** - increase in the housing need for the District.
- **Transport Modelling** - a move to a 'vision and validate' approach, instead of 'predict and provide'.

1.4.9 The representations to the **Regulation 18(1)** (**Appendix 3**) were also taken into account, which identified the need for further Housing and Employment Allocations, as well as updates to the evidence base. Concern was also raised that the Plan was proposing too much development given the rural nature of the District, the designations for landscape and nature and the lack of public transport provision.

1.4.10 A further SA Report, **Regulation 18(2) SA January 2026**, was prepared in support of the 'Focused' Review of the Local Plan (Regulation 18(2)), which built upon the findings of the Regulation 18(1) SA, the identified **Preferred Option (F),** as well as the options identified for further consideration (**Options B, D and G**) for the proposed Spatial Strategy.

Regulation 18(1)
Spatial Option F (Preferred Option)

To focus growth in and around all sustainable settlements (as defined in the Sustainable Settlement Strategy), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells), with limited employment growth (i.e. without Ashdown Business Park).

Reasonable Alternatives

1.4.11 Four spatial options were considered, which were tested as 'reasonable alternatives' for the purposes of the SA. The Options sought to test different locations for growth and amounts of development based on the preferred Spatial Strategy (**Option F**), selected at Regulation 18(1), but in the context of additional housing and employment need and the new approach to transport modelling.

1.4.12 The options were drawn up prior to the SA of the strategic and smaller sites and it was recognised that they may be subject to change following consideration of the results and further evidence at the Regulation 19 stage (**Reg. 18(2) NTS, para N.31, page 9**). The SA also stated that it was likely that the final Spatial Strategy would probably be a combination of Options presented and would follow the completion of evidence needed to inform the results.

1.4.13 The SA tested four options for growth, which built upon the desire to focus growth in and around sustainable settlements and to the edge of major towns adjacent to the District. The findings of the SA were then taken into consideration in the preparation of the 'Focused Review' of the Local Plan.

1.4.14 Concerns were raised in the representations received that there was a lack of clarity on the two options presented within the Draft 'Focused' Local Plan and their relationship to the SA. This issue has therefore been addressed as part of this Regulation 19 SA of the Local Plan.

1.4.15 Several of the respondents with development interests in the District, considered that the Options for growth set out in the SA were not reflected adequately in the Draft 'Focused' Local Plan and that the preferred option, as presented, did not meet the housing and employment needs for the District or address the needs of the neighbouring authorities.

1.4.16 Conversely, many respondents from the local community and local organisations considered the proposed quantum of development for housing and employment was still too high given the rural nature of the District, the designations for landscape and nature, and the poor provision of public transport.

Regulation 18(2) Spatial Options

OPTION 1:

Residential Development in / adjacent to Sustainable Settlements

15,612 homes (63% Housing Need)
+ employment 175,421 sqm (82% Employment Need)

OPTION 2:

Small & Medium Sites around Sustainable Settlements

19,011 homes (77% Housing Need)
+ employment 205,421 sqm (97% Employment Need)

OPTION 3:

Small & Medium Sites + Significant Extensions to Existing Settlements

22,211 homes (90% Housing Need)
+ employment 262,421 sqm (124% Employment Need)

OPTION 4:

Small & Medium Sites + Hesmonds Stud + Laughton New Villages

24,911 homes (100.6% Housing Need)
+ employment 315,921 sqm (149% Employment Need)

1 INTRODUCTION

Regulation 18(2) Consultation Key Findings

1.4.17 In summary the consultation responses expressed concern about the following key issues:

- ❑ Spatial Strategy does not meet the identified housing and employment need for the District
- ❑ The Spatial Strategy proposes too much development and impacts upon - landscape; ecology; HWNL; SDNP; transport & access; infrastructure; water & sewerage.
- ❑ The proposed strategy does not address the needs of Neighbouring Authorities
- ❑ The lack of clarity between the Options presented in the draft 'Focused' Local Plan Review and the SA
- ❑ Infrastructure Capacity and Provision
- ❑ Strong Objection to Strategic Site Allocations and Options including - Owlsbury Farm; East Hoathly allocations; Frant allocations; Ashdown Business Park; Land at Peelings Lane.

1.4.18 The Options did not consider the housing need from the neighbouring authorities at the Regulation 18 stage as the housing numbers from the authorities had not been published, and the available sites did not allow for significant additional provision above the District's need. Further consideration has been given to the neighbouring authorities housing and employment need in the review of the Spatial Strategy and Growth Options, alongside the updated evidence base and responses to the consultation.

1.4.19 A summary of the Regulation 18(2) SA consultation responses can be found at **Appendix 3** of this report as well as the **Council's Consultation Statement for the Regulation 19 Local Plan**, which includes the representations on all the site allocations and individual plan policies.

Stages B, C and D - SA Report, Regulation 19, September 2026 (this report)

1.4.20 A further review of the Options for the Spatial Strategy and Housing Need has been undertaken, which has taken into account the representations received, as well as new and updated evidence and site information that was not available at the Regulation 18 stage.

1.4.21 Further details on the approach taken can be found in the Draft Local Plan, the **Regulation 19 SA Report** (**Section 8**) and corresponding Topic Papers, which accompany the Regulation 19 Local Plan and have been updated with the latest information.

1.5 Equalities Impact Assessment (EqIA)

1.5.1 An EqIA is a tool which assists public authorities, including Local Authorities such as WDC, to comply with the requirements of the Public Sector Equality Duty (PSED) contained in section 149 of the Equality Act 2010.

1.5.2 The Equality Act is clear that Local Authorities must have due regard to a number of equality considerations when exercising their functions. The Duty requires the Council to consider how their policies and/or decisions affect people or the different groups living and working in their local area who are protected under the Equality Act, which includes planning policies or decisions.

1.5.3 The Equality Act provides protection for people against discrimination in relation to nine 'protected characteristics', which include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

1.5.4 The EqIA requirements have been considered as part of the SA process. The Council has also produced a separate EqIA for the Plan to ensure that the plan and its policies do not discriminate against those with protected characteristics and ensure that opportunities to address inequality are taken.

1.6 Health Impact Assessment

1.6.1 Although a Health Impact Assessment (HIA) is not a statutory requirement, the NPPF requires planning policies and decisions to:

"enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs".

1.6.2 The Council has decided not to undertake a separate Health Impact Assessment (HIA) of the Local Plan but has integrated the HIA into the SA to ensure that health and well-being impacts, particularly those affecting vulnerable groups and associated with health inequalities, are identified and addressed appropriately within the Plan.

1.6.3 Careful consideration was given to health and wellbeing issues at the Scoping Stage in preparing the SA Framework and the selection of objectives and indicators to be used in the assessment.

1 INTRODUCTION

1.7 Habitats Regulations Assessment (HRA)

1.7.1 A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it. European Sites and European Offshore Marine Sites identified under these regulations are referred to as 'habitats sites' in the NPPF.

1.7.2 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). Whilst the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment continues, as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

1.7.3 There are a number of sites designated as sites of European importance located within Wealden District. These include:

- Ashdown Forest Special Area of Conservation (SAC);
- Ashdown Forest Special Protection Area (SPA);
- Pevensey Levels SAC; and
- Pevensey Levels Ramsar site.

1.7.4 There are also SACs, SPAs and Ramsar Sites located in other Districts and Boroughs that the Council has considered as part of its HRA process. These include:

- Lewes Downs SAC; and
- Castle Hill SAC.

1.7.5 An HRA has been prepared alongside the development of the Local Plan to assess the potential threats and pressures to Habitats sites and analysis of potential impact pathways. An **Interim Regulation 18 HRA, 2024** explored the potential for Likely Significant Effects (LSEs) at the above-mentioned sites and found that an Appropriate Assessment was required regarding LSEs at Ashdown Forest SPA, Ashdown Forest SAC, Pevensey Levels SAC and Ramsar site and Lewes Downs SAC. The preliminary findings of the HRA indicated that mitigation would be required in relation to Ashdown Forest SPA and Pevensey Levels SAC Ramsar to conclude that the Local Plan will not cause any adverse harm to the integrity of the Habitats sites.

1.7.6 The Interim HRA provided an initial assessment of the Habitats sites located within and surrounding Wealden District to help inform the scope of the Habitats sites assessed, which would in turn inform the HRA for the Regulation 19 version of the Local Plan.

1.7.7 An update to the HRA was published in February 2026. The details of the update are set in **Section 3** of this report **(page 11**), which provides an update on the Baseline Information.

2 Sustainability Appraisal Methodology

2.1 Purpose of the Sustainability Appraisal

2.1.1 The purpose of the SA is to promote sustainable development through the integration of social, economic and environmental considerations into the plan making process. The SA must show how the requirements of the SEA Directive and UK regulations have been met (**See Appendix A1**).

2.1.2 The SA tests a Local Plan against sustainability objectives and identifies and reports on the **likely significant effects** of a plan's policies and proposals. The SA should ensure that the policies and proposals contained in the Local Plan contribute to the aims of sustainable development.

2.2 Planning Policy and Sustainable Development

2.2.1 The National Planning Policy Framework 2024 (NPPF) must be taken into account in the preparation of local plans and is a material consideration in planning decisions. Planning policies and decisions must also reflect and, where appropriate, promote relevant EU obligations and statutory requirements. The NPPF refers to the most widely accepted objective of sustainable development as:

"meeting the needs of the present without compromising the ability of future generations to meet their own needs". [1]

2.2.2 The NPPF specifies that the purpose of the planning system is to achieve sustainable development, which has three overarching objectives: social, economic and environmental. These objectives should be delivered through the preparation and implementation of plans.

SUSTAINABLE DEVELOPMENT OBJECTIVES

❑ **ECONOMIC**

To help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

❑ **SOCIAL**

To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

❑ **ENVIRONMENTAL**

To contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

National Planning Policy Framework

2.3 The Sustainability Appraisal Process

2.3.1 The SA process assesses the likely significant social, economic and environmental effects of the policies and proposals within a plan from the outset of its development. The SA is an iterative process as it evolves alongside, and feeds into, the development of the Local Plan. For the development of the District's Local Plan, the SA has informed the selection and refinement of policy and site allocation options.

2.3.2 The SA has been prepared by **Jam Consult Ltd**, a sustainability + Planning Consultancy, alongside Council Officers in accordance with the relevant regulations and guidance:

- ❑ EU Directive (2001/42/EC) or SEA Directive
- ❑ Environmental Assessment of Plans and Programmes Regulations (2004) (commonly referred to as the SEA Regulations)
- ❑ Planning and Compulsory Purchase Act 2004, Section 19(5) and Section 39 (b)
- ❑ National Planning Policy Framework 2024
- ❑ Government's Planning Practice Guidance (PPG) on SEA and SA.

1 **Resolution 42/187 of the United Nations General Assembly.**

2 SA METHODOLOGY

2.4 Stages in the SA Process

2.4.1 The Government's PPG on SA sets out five key stages in the preparation of Sustainability Appraisal for Local Plans. Each key stage is also divided up into a number of tasks.

2.4.2 **Figure 2.1** shows the five stages within the SA process and sets out how the Local Plan process occurs simultaneously, which is illustrated in the Government's Planning Practice Guidance (PPG) on SEA and SA.

2.4.3 **Stage A** (Setting the context and objectives, establishing the baseline and deciding on the scope) was addressed previously through the Scoping Report prepared in **June 2023**.

2.4.4 The **Initial SA Regulation 18(1)**, met the requirements of **Stage B** (Developing and Refining Options and Assessing Effects) of the SA process and **Stage C** (Preparing the Sustainability Appraisal Report) of the SA process. As **Figure 2.1** shows, these stages may be carried out more than once.

2.4.5 The **Regulation 18(2) SA Report** was an additional iteration of **Stages B and C** to reflect changes to legislation, policies, guidance and updated evidence.

2.4.6 The **Regulation 19 SA Report** (this report) provides a further iteration of the SA of the Local Plan **(Stages B, C and D)** before the Plan is submitted for examination.

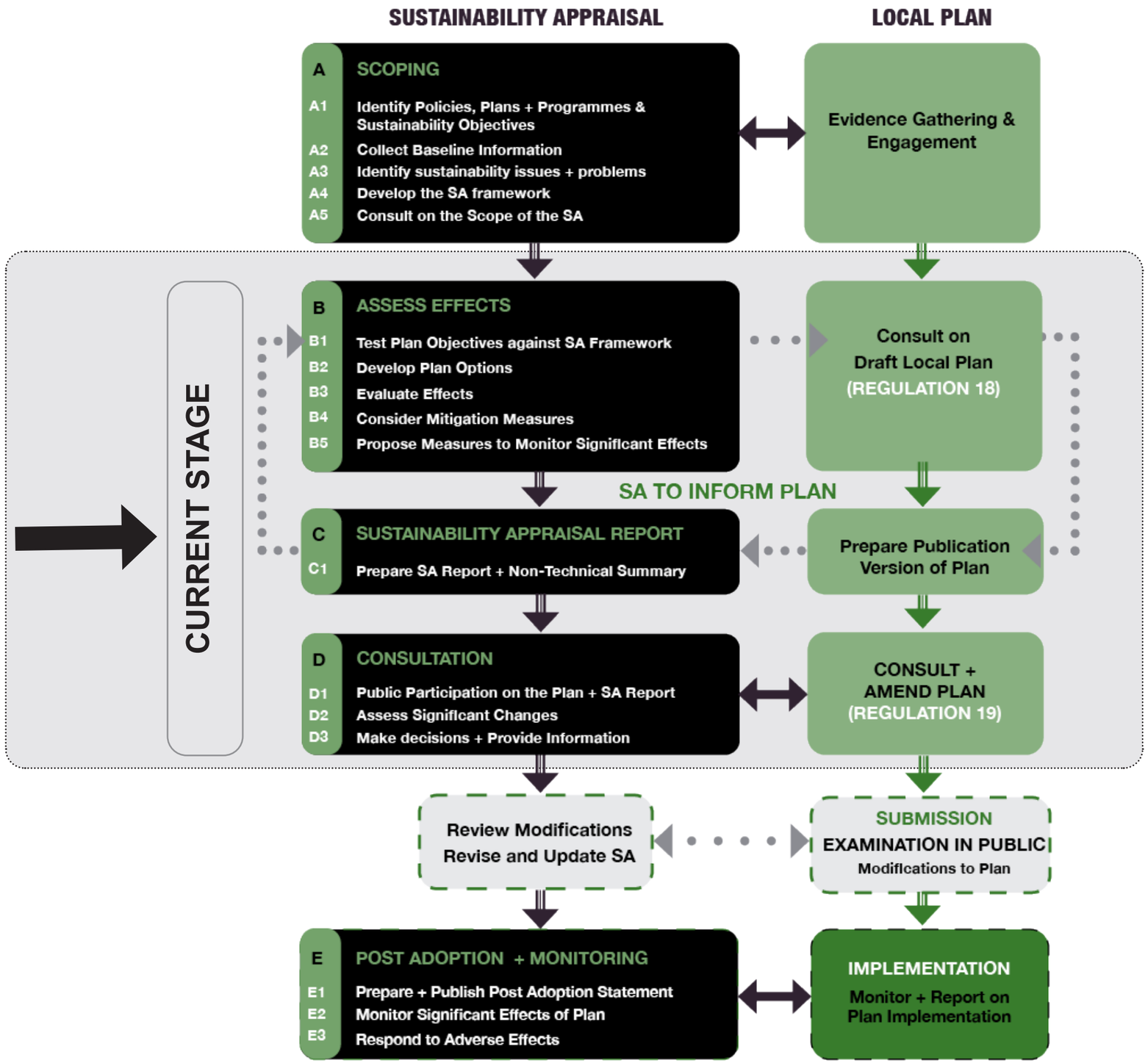


Figure 2.1: Current Stage within the SA process and relationship to the Local Plan preparation

2 SA METHODOLOGY

2.5 Method of Assessment

2.5.1 The **Environmental Assessment of Plans and Programmes 2004 (Section 12)** sets out the requirements to be included in the SA, which are detailed in **Schedule 1 & 2** of the Regulations. The assessment needs to identify, describe and evaluate the likely significant sustainability effects of the Plan. When determining the likely significant effects on the environment, the SA should include the following issues:

- ❑ Biodiversity
- ❑ Population
- ❑ Human health
- ❑ Fauna and flora
- ❑ Soil
- ❑ Water
- ❑ Air
- ❑ Climatic factors
- ❑ Material assets
- ❑ Cultural heritage including architectural and archaeological heritage and landscapes.

2.5.2 The assessment should consider the inter-relationships between the effects (how they interact with one another) and the decision-making criteria set out in the SA Framework.

2.5.3 The assessment must also assess:

- ❑ the probability, duration, frequency and reversibility of the effects
- ❑ the cumulative nature of the effects
- ❑ the risks to human health or the environment (e.g. due to accidents)
- ❑ the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)
- ❑ the value and vulnerability of the area likely to be affected due to:
  - ▶ special natural characteristics or cultural heritage
  - ▶ exceeded environmental quality standards or limit values
  - ▶ intensive land-use
  - ▶ the effects on areas or landscapes which have a recognised national, community or international protection status.

2.5.4 The assessment has been carried out in the form of a matrix and includes the identification of potential mitigation measures. The SA predicts and evaluates the likely significant effects including:

- ❑ short, medium and long-term effects
- ❑ temporary and permanent, direct and indirect effects
- ❑ cumulative or synergistic effects
- ❑ consideration of mitigation measures
- ❑ proposals to monitor the effects of the Plan.

2.5.5 The impacts are scored as follows:

Sustainability Appraisal Impacts	
Major Positive	
Minor Positive	
Uncertain	
Minor Negative	
Major Negative	
No Significant Impact	

2.5.6 A commentary accompanies the matrix to explain the reasons for the results. The results are assessed in terms of short, medium and long-term effects (5, 10 and 15 years) including permanent and temporary effects. The assessment of alternative options includes a summary of the reasons for selection and rejection to provide a clear audit trail and document a transparent approach to the assessment.

2.5.7 The SEA Directive also requires an assessment of secondary, cumulative and synergistic effects. Collectively these effects are called cumulative impacts. Cumulative impacts may arise, for example, where several developments each have insignificant effects but together have a significant effect or where several individual effects have a combined effect. Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity.

2.5.8 The SEA checklist (**Appendix 1**) sets out the stages of the SA which have been completed according to the Regulations and provides a signpost to the relevant sections of the report.

2.6 Limitations of predicting effects

2.6.1 SA is a Strategic Environmental Assessment tool for predicting the **'likely significant effects'** of the Plan. The assessment is a high level, objective process and the prediction of effects relies upon an evidence based approach, which incorporates expert judgment. When predicting effects, it is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and / or the success of mitigation measures put forward in future planning applications.

2.6.2 The assessments that have been undertaken in this report are based on the best publicly available information and every attempt has been made to predict effects using this information as accurately as possible. The 'reasonable alternatives' have been assessed using the same method. Where detailed or up-to-date data is unavailable, then reasonable assumptions have been made to inform the assessments. The Regulation 19 Stage SA of the Local Plan has addressed any remaining uncertainty as far as possible.

2.6.3 A number of difficulties and limitations were experienced in the course of the SA process as follows:

- ❑ In many instances detailed information was not available for the site assessments. Reasonable assumptions were therefore made, based on the information available at the time of the assessments.
- ❑ The evidence base upon which effects have been identified has continued to evolve and has been updated throughout the plan preparation process. Every effort has been made to ensure that this version of the SA Report reflects the most up to date evidence base.
- ❑ Additional evidence and information has been produced since the Regulation 18 stage, which has been used to inform the Regulation 19 Local Plan and SA, including:
  - ▶ Housing Need Update & Population data
  - ▶ SHELAA Update
  - ▶ Transport modelling
  - ▶ Landscape Character Assessment
  - ▶ Habitats Regulations Assessment
  - ▶ Heritage Study
  - ▶ Neighbouring Authorities Housing & Employment Need
  - ▶ 'No Stone Unturned' Report
  - ▶ Brownfield Land
  - ▶ Information in relation to proposed Site Allocations
  - ▶ Infrastructure capacity
  - ▶ Water Cycle Study
  - ▶ Viability Assessment.

3 Baseline Information

3.1 Plans, Policies and Programmes

3.1.1 The relevant Plans, Policies and Programmes (PPPs) at the international, national, regional, sub-regional and local level, which could have implications for the SA were identified and reviewed to establish any issues relevant to the Local Plan.

3.1.2 The Local Plan is being prepared under the legacy planning system, which requires the Local Plan to be submitted for Examination by December 2026. The NPPF December 2024 has therefore been used for the development of the Plan, rather than the revised NPPF 2026.

3.1.3 The National Planning Policy Framework (NPPF) 2024 sets out the Government's planning policies for England and how these should be applied. The NPPF must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements. At the heart of the Framework is a presumption in favour of sustainable development as set out at **Paragraph 11 of the NPPF.**

3.1.4 The NPPF should be read in conjunction with National Planning Policy Guidance (PPG), which adds further context and provides more detailed guidance on national planning policy.

3.1.5 Planning policies and decisions must also reflect the new requirements of the **Environment Act 2021** ('the Act'). The Act sets out targets, plans and policies for protecting and improving the natural environment in the UK. The Act provides the UK's new legal framework for environmental protection. Given that the UK has now left the EU, the Act brings in new laws in relation to improving air and water quality, tackling waste and promoting resource efficiency, improving nature and biodiversity, protecting the climate, improving environmental reporting and making other environmental improvements.

3.1.6 In addition to the requirements of the NPPF (2024) and the Environment Act (2021), the relevant provisions in the **Levelling Up and Regeneration Act 2023**[2] **(LURA)** must be considered when preparing the development Plan. In general, the LURA aims to reverse the geographical disparities between different parts of the UK by spreading opportunity more equally. The Act is wide-ranging but has planning reform at its heart. The Act gained Royal Assent in October 2023, however, many of the planning reforms are subject to secondary legislation and further consultation is needed.

Presumption in Favour of Sustainable Development

Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. **the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or**

ii. **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**

NPPF: Para 11

3.1.7 The LURA builds on targets set by the Environment Act 2021 to foster better environmental outcomes. The LURA introduces a new form of environmental assessment known as Environmental Outcome Reports (EOR). The intention is for Environmental Outcome Reports to replace the existing system of Sustainability Appraisals (SA), Strategic Environmental Assessments (SEA) and Environmental Impact Assessments (EIA). The exact form of the EORs will also be subject to further consultation in the future. This Local Plan is being prepared using the legacy planning system and current system of SA in accordance with the transitional arrangements.

3.1.8 A full list of PPPs that are of relevance to the SA and the Local Plan are provided at **Appendix A, SA Scoping Report, 2024.**

2 Levelling - up and Regeneration Act 2023

3 BASELINE INFORMATION

3.2 Baseline Information

3.2.1 The Scoping Stage entailed an extensive review of information in relation to the existing baseline characteristics of the area to establish the evidence base, from which sustainability issues and constraints were identified. The baseline data is set out in **Sections 5.0 – 18.0 of the Scoping Report 2023** (updated to account for consultation responses, January 2024).

3.2.2 Further evidence on the following issues has been published since the Regulation 18 consultation, which identifies key issues of relevance to the SA and is discussed in more detail below:

- ❑ Brownfield Land
- ❑ Climate Change
- ❑ Economy
- ❑ Habitats Regulations Assessment (HRA)
- ❑ Heritage
- ❑ Housing
- ❑ Infrastructure
- ❑ Landscape & Biodiversity
- ❑ Transport
- ❑ Viability
- ❑ Water & Flood Risk.

Brownfield Land

3.2.3 Local Authorities are required to keep Brownfield Land Registers, which provide up-to-date and consistent information on sites considered appropriate for residential development, having regard to the criteria set out in regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017. At the end of December 2025 there were 19 live sites on the register.

3.2.4 The Local Plan seeks the prioritisation and support for the redevelopment of brownfield land, ensuring appropriate remediation where this is required and is included as an objective within the Sustainable Development Framework, which will be part of the monitoring framework for the Plan. However, the potential to utilise brownfield land is understandably limited.

3.2.5 As a result of the limited brownfield land in the District, most development is likely come forward on greenfield sites. Of the proposed site allocations, 22 (18.8%) of the total allocations are classified as brownfield sites.

Climate Change

3.2.6 The Council commissioned consultancy Arup, to prepare the Climate Change and Renewable Energy Evidence Base in December 2024, which consisted of three parts:

- ▶ **Part 1: Climate Change Mitigation and Adaptation Study**
  Baseline and Policy Review
- ▶ **Part 2: Clean Energy Opportunities and Implications Study**
  Assesses the potential for renewable power generation and the provision of low-carbon heating within Wealden District Council. The aim is to evaluate the District's renewable energy potential to enhance local capacity, support de-carbonisation efforts, and mitigate emissions from new developments and population growth.
- ▶ **Part 3: Accelerating the Road to Net Zero**
  The report provides a document review of the Climate Change Strategy and adopted policy, identifying where there are gaps that could be addressed in the emerging Local Plan and the new Climate Change Strategy and Action Plan. The scenarios for both existing and planned developments point out that a transition to fossil fuel-free buildings and electric vehicles combined with local renewable electricity generation will be essential features of a net zero emissions future.

3.2.7 The Council also produced its **Climate Change Strategy and Action Plan in 2025**. The Strategy sets out the Council's commitment to leading the transition to a net zero, and a climate-resilient future by empowering its communities, protecting the natural environment, and fostering a fair and thriving local economy. Through bold action on renewable energy, sustainable transport, biodiversity, waste reduction, and inclusive engagement, the Council aims to create a greener, healthier, and more equitable Wealden for current and future generations. The strategy focuses on eight key themes:

1. **Empowering and Supporting Communities for Climate Action –** supporting local climate action and ensuring a just transition
2. **Buildings and Energy Use –** making homes and buildings more energy efficient and affordable to heat
3. **Energy Generation –** investing in renewable energy and local energy resilience
4. **Travel and Transport –** encouraging walking and cycling and cleaner transport options
5. **Maximising Resource Use and Reducing Waste –** reducing waste and promoting reuse and recycling
6. **Nature, Biodiversity, Soil, Food and Health –** restoring nature, improving biodiversity and supporting community wellbeing
7. **Green Low Carbon Economy –** supporting sustainable local businesses and green jobs
8. **Governance, Finance and Leadership –** embedding climate action in everything the Council does.

Economy

3.2.8 Wealden District Council and Eastbourne Borough Council jointly commissioned Iceni Projects to update their 2022 Employment and Economic Study. The update focuses on the employment land requirements for the 2025 to 2042 period and was published in January 2026.

3.2.9 The study identified the following policy considerations:

- ▶ Employment forecasts indicate a good employment growth outlook, despite the pandemic related setback re-basing employment levels. The tourism economy is expected to continue to be a driver and niche sectors such as viticulture are reportedly promising in developing rural diversification. Housing growth is also likely to support employment in sectors such as construction. Professional services are expected to grow, which may in part be facilitated by remote working practices.
- ▶ Whilst growth in office-based sectors is forecast, in reality, there are no signals for substantial new build office requirements. Development may be owner occupier, ad hoc or delivered through refurbishment of existing buildings including for flexible workspace, including co-working space.
- ▶ There is continued strong demand for a range of industrial units to support businesses throughout all stages of their lifecycle from start-up to grow-on space. Supply injections will be critical to providing flexibility within the market to allow for intensification and redevelopment to come forward without business losses. The site allocations and pending sites with a planning application will enable the District to get closer to meeting its quantitative employment land needs.
- ▶ It is recommended that development in the north of the District, particularly around Crowborough, Uckfield and along the A22, should be explored, to support the expansion of businesses located in these towns. The expansion of the Ashdown Business Park should also be further explored as an option to satisfy this demand. Other locations further north in the District are likely to fall within the High Weald National Landscape.
- ▶ It is considered that Eastbourne Borough Council has sufficient land available to meet Eastbourne's employment land requirements.

3 BASELINE INFORMATION

Habitats Regulations Assessment

3.2.10 The objective of the HRA is to identify any aspects of the Plan that may result in Likely Significant Effects (LSEs) and, where relevant, adverse effects on the integrity of Habitats (previously European) sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), either in isolation or in combination with other plans and projects.

3.2.11 The HRA also advises, as necessary, on appropriate policy mechanisms for delivering mitigation where adverse effects on integrity are identified. Under the Conservation of Habitats and Species Regulations 2017 (as amended), an Appropriate Assessment of impact pathways is required, where a plan or project is likely to have a Likely Significant Effect (LSE) upon a Habitats Site, either alone or in combination with other plans and projects.

3.2.12 An initial assessment of the designated sites within and surrounding Wealden District, and the impact pathways linking to the proposed growth, highlighted that several Habitats sites required consideration, including:

- Ashdown Forest SPA / SAC
- Pevensey Levels SAC / Ramsar
- Lewes Downs SAC
- Castle Hill SAC.

3.2.13 The impact pathways that required consideration, in relation to the scale and location of growth and site-specific ecological sensitivities, included: atmospheric pollution; recreational pressure; water quantity, level and flow; and water quality.

3.2.14 In summary, it is considered that the ability of the SACs and SPA to achieve its Conservation Objectives in relation to the above site specific sensitivities would not be significantly compromised by the proposed Local Plan growth either alone or in combination with other plans or projects.

3.2.15 Further work on sewerage treatment capacity, however, is needed to ensure that all allocated sites can come forward. Until it is confirmed that adequate headroom is available in the two WwTWs near Hailsham, adverse effects of the plan on the Pevensey Levels SAC / Ramsar regarding water quality from treated sewage effluent cannot be excluded. **(See HRA 2026 for further information.)**

3.2.16 A **Water Cycle Scoping Study** has therefore been carried out to understand the sewerage treatment capacity of the WwTWs and the potential impacts of the allocated sites, which is set out in more detail below. The findings of the Water Cycle Study have been taken into account in the assessment of sites. Further details can be found in the section on Water & Flood Risk below **(para 3.2.74).**

Heritage Study

3.2.17 The Wealden Heritage Study 2026 identifies the heritage of the District (excluding the South Downs National Park) looking at the historic built environment, cultural values, traditions and continuities, and the District's natural landscapes and habitats. The Study describes the opportunities, issues and vulnerabilities pertaining to Wealden's heritage and how it can be improved, managed and understood.

3.2.18 The Study provides direction to the Council and all other partners involved in the management of heritage within the District through a set of 23 prioritised recommendations to guide the practical implementation of the objectives including the incorporation of policy regarding the role of Wealden's heritage in addressing climate change and other environmental crises into the Local Plan.

Housing

Housing Need

3.2.19 To support the Government's objective of significantly boosting the supply of homes, the NPPF 2024 states it is important:

"that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

3.2.20 The Government's overall aim is to meet the area's identified housing need, including an appropriate mix of housing types for the local community. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national Planning Practice Guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for within the District.

3.2.21 As a result of the revised NPPF (December 2024) changes to the housing need calculation resulted in a significant increase in the housing need for the District from **1,200 dwellings per annum (dpa) to 1,465 dpa,** equivalent to **23,440 homes** over the plan period from 1 April 2026 to 31 March 2042.

3.2.22 The Council has since prepared an updated Local Housing Needs Study 2026 to inform the Local Plan. The East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, 2022 has also been prepared to identify the specific needs of this section of the community and make appropriate provision within the Plan. The assessment identified a need for 51 pitches and 3 plots (ethnic definition).

3.2.23 Affordable housing is a key priority for the Council because many households cannot afford suitable market housing in Wealden. National planning policy requires the Plan to identify need and secure affordable homes through development as part of mixed and balanced communities. The evidence indicates that there is an acute need for affordable housing in the district (754 per annum), with the greatest need for affordable rented housing, supplemented by affordable home ownership products to provide opportunities for households seeking to access home ownership.

3.2.24 The Local Housing Needs Assessment, Iceni Projects, 2026, also estimated that population growth might be able to support between 18,900 and 28,300 additional jobs, depending on the assumptions made about commuting and economic activity, with higher economic activity likely to result in more job growth.

Gypsies, Travellers and Travelling Showpeople

3.2.25 National policy requires local planning authorities to assess and plan for the accommodation needs of Gypsies, Travellers and Travelling Showpeople. The Council seeks to ensure that appropriate accommodation is provided to meet identified needs whilst supporting community cohesion and ensuring access to suitable and sustainable sites.

3.2.26 The East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) (2022) identifies accommodation needs across the District. The GTAA identifies a need for 51 Gypsy and Traveller pitches and 3 Travelling Showpeople plots between 2021 and 2040

3.2.27 The GTAA assesses needs to 2040, whereas the Local Plan runs to 2042. The Council will continue to monitor accommodation needs and review evidence as necessary to ensure sufficient provision is maintained throughout the plan period.

3 BASELINE INFORMATION

Population Growth

3.2.28 The District is made up of five different housing market sub areas including:

- Coastal West Sussex
- Eastbourne
- Hastings and Rother
- Northern West Sussex
- Sevenoaks and Tunbridge Wells.

3.2.29 The population for each housing market sub area has been considered to determine the percentage increase in population as a result of the proposed housing growth. The tables below set out the population estimates in 2019 and the projected increase from housing growth in 2026.

HMA Sub Areas	Wealden Population	% of Wealden Population	Estimated HMA Pop.	% of HMA Pop. in Wealden
Coastal West Sussex	29,946	19%	702,012	4%
Eastbourne	65,567	41%	169,312	39%
Hastings and Rother	2,533	2%	191,274	1%
Northern West Sussex	9,139	6%	386,062	2%
Sevenoaks & Tunbridge Wells	54,290	34%	343,800	16%
TOTAL	**161,475**	**100%**	**1,792,460**	**9%**

Source: Iceni Projects 2025 (ONS Mid Year Population Estimates 2019)

HMA Sub Areas	Population % increase 2019	Housing Growth % increase 2026
Coastal West Sussex	18.4	37.2
Eastbourne	40.6	40.3
Hastings and Rother	1.5	3.96
Northern West Sussex	5.6	0.14
Sevenoaks and Tunbridge Wells	33.6	18.39

Source: Iceni Projects 2025

3.2.30 The figures show that the amount of housing growth proposed for each HMA is broadly in line with the percentage growth of population proposed in the Wealden area. The exception is the Coastal West Sussex HMA where the proposed increase is 37.2% which takes account of the fact that it has highest order sustainable settlements (Uckfield) and is less constrained than other areas to the north, constrained by the High Weald National Landscape and Ashdown Forest.

3.2.31 In contrast, less housing growth is proposed in the Tunbridge Wells area, including the Parish of Frant, which has already experienced substantial growth. The lower amount of growth in 2026 reflects the recent increase in population and the constraints for future growth including the High Weald National Landscape.

Neighbouring Authorities

3.2.32 The District has very clear links to Eastbourne as well as areas which closely relate to the surrounding local authorities including Tunbridge Wells, Lewes, Hastings & Rother and Crawley/Mid Sussex.

3.2.33 **Figure 3.1** above shows that the majority of the neighbouring authorities are failing to meet their identified housing need, owing to the different constraints on development of the authorities. As a consequence, there is no opportunity for another authority to assist Wealden in meeting its need or for Wealden to assist a neighbouring authority in meetings its need.

3.2.34 Consideration has been given to major sites at the boundaries of the District and its neighbours, where there is scope to develop land which is mutually beneficial to the authorities concerned. The potential for such sites has been addressed in the SA of specific sites and concerns development adjacent or close to the administrative areas of Tunbridge Wells and Rother.

Local Authority	Housing Need Plan Period	Proposed Plan Period	Shortfall/ Surplus Plan Period	Housing Needs (dpa)	Proposed Supply (dpa)	Shortfall (dpa)	Housing Need (%)
Eastbourne (2022-2042)	14,280	**6,020**	- 8,270	714	**301**	413	**43%**
Hastings (2023-2041)	12,546	**3,373**	- 9,173 to - 9,405	697	**187**	510	**27%**
Lewes (2020-2042)	15,004	**8,570**	- 6,424	682	**390**	292	**57%**
Mid Sussex (EiP) (2021-2039)	18,981	**21,241**	+ 996	999	**1,118**	+119	**112%**
Rother (2025-2042)	15,504	**8,427**	-7,287	912	**495**	417	**54%**
Seven Oaks (2027-2042)	17,175	**16,321 to 18,900**	+1,725	1,145	**1,088**	854	**95-104%**
South Downs NPA (2024-2042)	6,137	**-**	+623	323	**-**	-	**110%**
Tandridge (2024-2044)	14,895	**-**	-	993	**-**	-	**New Plan System**
Tunbridge Wells (2020-2038)	-	**12,204**	-	678	**-**	-	**Adopted 2025**
Wealden [Reg. 19] (2026-42)	23, 440	**16,833**	6,507	1,465	**1,052**	413	**71.81%**

Figure 3.1: Local Authorities Housing Need Figures, Neighbouring Authorities (2026)

3 BASELINE INFORMATION

Infrastructure

3.2.35 **The Infrastructure Delivery Schedule (IDS), September 2026** sets out the key items of additional infrastructure that are considered necessary to deliver the Local Plan and provides information on:

- level of priority for provision
- any risks where these are known
- delivery lead bodies
- timescales for delivery
- indicative costs (if known at this stage)
- how infrastructure will be funded
- any funding gaps (if known at this stage).

3.2.36 Over time, the IDS will provide a monitoring tool against which progress, and delivery can be assessed. The IDS is organised by infrastructure type with information being provided in 3 schedules namely:

- District wide Strategic Infrastructure Projects, which affect the whole or large part of the District
- Local infrastructure requirements
- Local infrastructure requirements by Parish.

3.2.37 The IDS indicates how the infrastructure delivery is prioritised and categorises it as:

- **Critical** – Includes infrastructure that must happen to enable growth. It is a prerequisite to unlock any future works without which development cannot proceed. It may also include essential services that are required to facilitate growth or be delivered in advance of development. Examples of this include strategic highways interventions or education facilities.
- **Essential** - Includes infrastructure that is essential and considered necessary to mitigate impact arising from development. These are projects that are usually identified as required mitigation in Environmental Impact Assessments (EIA), Transport Impact Assessments (TIA), Strategic Environmental Assessment (SEA) or Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) testing to make the proposed development acceptable in planning terms and are directly related to the development, for example, local road network improvements or active travel infrastructure.
- **Desirable** - Includes infrastructure that is required for sustainable growth but is unlikely to prevent development in the short to medium term. This is often aligned to place making objectives without being essential for development to come forward. Examples of this include rail infrastructure or social / community facilities.

3.2.38 The IDS also identifies at a high level, the risk to delivery for each infrastructure item. The risk level identified relates to the delivery of the specific infrastructure project and not the delivery of the draft growth strategy. The risk levels are divided into three categories:

- **High** – Significant constraints that if not overcome will prohibit development from coming forward e.g. Revenue stream.
- **Moderate** – Moderate constraints or uncertainty attached to the delivery of the scheme.
- **Low** – Delivery of the scheme is certain and there are no constraints or limitations.

3.2.39 Throughout the lifespan of a scheme the levels of risk may vary. It is therefore essential that the IDP and IDS are reviewed and updated regularly to inform the plan-making process.

Education

3.2.40 The East Sussex County Council School Organisation Plan 2025 to 2029 provides a 4-year rolling plan, which is updated every year and has been used to inform the SA and Local Plan. The plan sets out how East Sussex County Council (the local education authority) will meet its statutory duty to provide enough primary, secondary and special educational needs places in the right locations to meet demand. The document contains information on:

- The current pattern of school provision across the county
- Forecasts of future school numbers
- Plans to meet the need for more places in areas of growth
- Plans to address the over-supply of places in areas with falling rolls.

Landscape Character Assessment

3.2.41 One of Wealden's principal assets is its high quality environment. This is reflected in the high proportion of the District which is protected for its landscape and biodiversity importance. The High Weald National Landscape and the South Downs National Park together cover some 60% of the District and there are numerous European, national and locally designated sites protected for their habitats and species. The richness and diversity of its biodiversity, landscape and heritage are significant factors in making the District such a desirable place to live, work and visit. However, this fact, coupled with a limited legacy of brownfield land, places additional pressures on the District's countryside and settlement edges.

3.2.42 LUC was commissioned to carry out **The Landscape Character Assessment 2022** and **Landscape Sensitivity Assessment (2023-2026)** for Wealden. The Landscape Character Assessment provides a spatial framework, and the descriptions and evaluations for each landscape character area (LCA) also inform the sensitivity assessment. The Landscape Character Assessment divides the landscape of the District into six Landscape Character Types (LCTs), and 12 component areas of different character (Landscape Character Areas). The South Downs Landscape Character Assessment 20204 provides information on the landscape character of the National Park and provides a guide to ensure that its natural beauty is protected and enhanced.

3.2.43 The Landscape Sensitivity Assessment was prepared to help consider the sensitivity of the landscape to residential and employment development in Wealden. The study focused on the relative landscape sensitivity of different landscapes within the District (outside the South Downs National Park) to help inform decisions on the potential location of housing and employment growth, and the subsequent allocation of sites in the new Local Plan; as well as to guide consideration of individual planning applications. The study sets out the overall landscape sensitivity results for individual or grouped SHELAA sites and provides landscape mitigation guidance for the District.

3 BASELINE INFORMATION

Local Nature Recovery Strategy

3.2.44 Local Nature Recovery Strategies are spatial strategies covering the whole of England, introduced by a new legal requirement arising from the Environment Act 2021. The Strategies are intended to drive more coordinated, practical and focused action on nature recovery, to support the delivery of Biodiversity Net Gain and provide a focus for the strengthened duty on all public authorities to conserve and enhance biodiversity. East Sussex County Council is responsible for the preparation of the Local Nature Recovery Strategy (LNRS) for East Sussex and Brighton and Hove, which was published in June 2026. The LNRS sets out the main principles and priorities for nature recovery in the area and the actions needed to deliver them.

3.2.45 Nearly two thirds of the LNRS area is designated for its natural beauty:

- 49% lies within the High Weald National Landscape
- Nearly 16% is within the South Downs National Park.
- Part of the LNRS area lies within The Living Coast Biosphere, a UNESCO designation recognising the environmental and cultural importance of the area and where communities work together to balance the needs of people and nature
- Wealden includes four National Character Areas including: - Low Weald; High Weald; Pevensey Levels and South Downs.

3.2.46 The strategy identifies 24 habitat priorities and 165 priority species with detailed measures (or actions) that can support their recovery, building on eight key principles:

- In our core areas for nature, hold on to what we have and make it better
- Create a network of 'bigger, better, more and joined-up' wildlife-rich spaces across our rural and urban landscapes
- Think big: work at scale to support ecosystems and natural processes
- Work together through a source-to-sea approach to support our terrestrial, freshwater, coastal and marine environments
- Showcase and support action for nature across our farmed landscapes
- Support species special to East Sussex and Brighton & Hove
- Invest in and use nature to deliver wider benefits where we need them
- Bring nature into everyday life, providing places for people to benefit from and engage with nature.

3.2.47 The strategy sets out how and where action can be taken across the area, which will make a particular contribution to achieving the priorities. The LNRS aims to:

- Focus future effort & funding into local priorities for nature, including Biodiversity Net Gain (BNG)
- Aid collaboration by enabling public, private & voluntary sectors to work more effectively together
- Guide local planning, informing public authorities' strengthened duty to conserve and enhance biodiversity
- Identify opportunities for 'nature-based solutions' to wider environmental problems like flooding, climate change or poor water quality
- Improve targeting – ensuring the right things are done in the areas where they will be most effective.

Town Centres

3.2.48 **The Wealden Town Centres Study, January 2026** was prepared by consultancy Nexus. The study included health checks for four district centres - Crowborough, Hailsham, Heathfield and Uckfield and three service centres - Forest Row, Polegate and Wadhurst. Overall, the centres are considered to be functioning well, with vacancy rates below national averages and strong convenience offers anchored by major supermarkets.

3.2.49 Comparison retail provision remains limited, and several centres exhibit weaknesses in accessibility, environmental quality, and night-time economy. Uckfield is the largest and most popular centre, while Forest Row and Wadhurst stand out for their distinctive independent retail offer and strong sense of community identity.

3.2.50 The study also provides a detailed market share and capacity assessment, which identifies a minor increase in leakage to external destinations, whilst out-of-centre destinations, such as the new M&S at Ashdown Business Park, have increased their market share.

3.2.51 Based on constant market share and projected population growth, the Study shows that Wealden could support 3,700–4,700 sq m net of new convenience floorspace by 2030, increasing to 7,600–9,700 sqm net by 2040.

3.2.52 For comparison goods, the household survey findings show that Wealden retains 30.6% of comparison goods spending (£267.7m), up from 24.2% in 2021, a significant improvement. Leakage to higher-order centres (Eastbourne, Tunbridge Wells) remains high at 69.4% but has reduced from 75.8% in 2021. In terms of floorspace capacity, the District is shown to potentially support a further 2,500–3,900 sqm net of comparison goods floorspace by 2030, increasing to 7,600–11,900 sqm net by 2040.

3.2.53 In terms of commercial leisure findings, the Study finds that projected surplus expenditure could support 6,990 sq m net of additional restaurant, café, and bar floorspace by 2040, up from 2,360 sqm by 2030.

3.2.54 The study provides policy recommendations including maintaining the existing retail hierarchy, prioritising town centre sites for new development, and applying a locally set impact threshold of 350 sqm for retail and leisure proposals in edge-of-centre and out-of-centre locations.

3.2.55 Notwithstanding the capacity findings of the study, it is emphasised that capacity does not equate to need and that qualitative considerations such as improving the diversity of retail and leisure provision, re-occupying existing vacant floorspace, enhancing public realm, and addressing accessibility issues should guide decision-making.

Transport

3.2.56 The Wealden Local Plan Shared Transport Evidence Base (STEB) May 2026 was prepared using the recently developed East Sussex Countywide Transport Model (ESCWTM) to assess the transport impacts of the potential growth distribution in Wealden and from other emerging Local Plans in the county and surrounding area.

3.2.57 The report sets out the outcomes of the first stage of using the ESCWTM, considering multiple scenarios for growth across Wealden District. Several transport-related challenges are identified including:

- high car ownership
- heavy reliance on car travel
- gaps in sustainable transport provision
- connectivity issues in rural areas.

3.2.58 Funding transport schemes is a key constraint and more will need to be done to support delivery, as well as identifying funding for any more substantive measures, such as those set out in the Transport for the South East (TfSE) Draft Strategic Investment Plan (SIP), needed to mitigate the impacts of Local Plan growth.

3.2.59 The 2026 analysis of the growth options indicates:

- **Highways Network** - The network could be at risk of increased congestion and delays on the A22 corridor, the A27 (Strategic Road Network (SRN)), the A2270 into Eastbourne, the A26 towards Lewes and at key junctions across the District in the future
- **Traffic** - The traffic generated by the proposed growth distribution would have the greatest impact on the A22, particularly on the section of single carriageway north of Hailsham, and the dual carriageway section to the south of Hailsham
- **Mitigation** - Mitigation is likely to be needed to improve sustainable travel options and also at specific locations along key corridors, particularly on the constrained A22.

3.2.60 The impact of traffic growth to the north of the District and through the Ashdown Forest Special Area of Conservation (SAC) is subject to further, separate assessment within the Habitats Regulation Assessment (HRA).

3.2.61 The interim STEB was also used to gain an understanding of the potential cross-boundary impacts arising from the emerging spatial strategies in neighbouring local planning authorities within the county. All Local Planning Authorities (LPAs) within East Sussex are still developing the evidence required to support their Local Plan allocations.

3.2.62 The 2026 modelling indicates that if Local Plan developments progress, congestion and delays are expected to increase, particularly during peak periods on key corridors and junctions. The study identifies several high-pressure routes, constrained junctions at major A-roads, and, town centres areas, that would require upgrades to accommodate future traffic demand. This level of growth could result in severe impacts on the District's road network, making mitigation measures likely to be necessary.

3.2.63 The preferred approach is to focus on planning for people and places by prioritising sustainable and future mobility options before considering traditional highway capacity interventions.

3.2.64 TfSE has published its draft Strategic Investment Plan (SIP) which sets out a 'Sustainable Route to Growth' within its transport and future mobility strategies. The SIP identifies the need for £45bn of capital investment in transport infrastructure across the region and a 9% reduction in forecast car use, by:

- Making active travel the first choice for short journeys
- Enhanced partnerships and improvements to interurban and rural public transport services
- Placing zero emission bus rapid transit (BRT) at the centre of the transport system
- Planning for and adapting to technology 'place-based bundles', reducing car dependency and ownership.

3.2.65 It is considered that Wealden has the potential to achieve car use reduction by enhancing sustainable links on the A22 corridor, between Polegate, Hailsham, Uckfield and neighbouring Eastbourne. The rural areas and smaller towns in the central and northern areas of the District present a number of challenges, such as access to public transport and the proximity of key services, and a lower reduction in forecast car use is more likely, depending on the measures deployed.

3.2.66 It is recommended that the Local Plan integrates a range of mobility solutions with the principles of place making and the transport needs of residents to deliver the desired outcomes, including:

- **Accessibility** - to plan for '20-minute' neighbourhoods with easy access to key services, public transport and active travel networks within development
- **Behavioural change** - to reduce the need to travel, the level of car ownership in accessible town centre locations and support the switch to electric vehicles
- **Active travel** - to move away from car dominated roads to create safe and connected corridors for pedestrians, cyclists and other micro-mobility options
- **Bus** - to develop enhanced partnerships, prioritised zero-emission mass bus rapid transit (BRT) and digital demand responsive transport (DDRT) solutions to serve more remote rural areas
- **Rail** - to continue improvement to the level of service, the introduction of High-Speed rail and better integration with bus, active and micro-mobility options
- **Future mobility** - to explore the concept of Mobility as a Service (Maas), potential for shared mobility hubs and alternatives to traditional car ownership
- **Last-Mile delivery** - to use innovative solutions to consolidate deliveries and reduce goods vehicles on network.

3.2.67 The modelling indicated that without mitigation, the proposed Local Plan growth options could have severe impacts on the road network. However, if mitigation measures are implemented at the appropriate stages, then Wealden District Council's Local Plan growth could be accommodated by the transport network. Achieving this outcome will require coordinated phasing of development continued investment in sustainable travel options, and regular monitoring to maintain network resilience.

3.2.68 A further more detailed assessment has been undertaken to support the final set of allocations within the Regulation 19 Local Plan. The assessment has concluded that with mitigation, including monitoring and management strategies, the results will not have a severe impact upon the transport network.

Viability

3.2.69 The Viability Report, September 2026 was prepared by BNP Paribas Real Estate, and tests the ability of developments in Wealden District to accommodate policies being developed as part of the emerging Wealden Local Plan alongside considering alternative rates of Community Infrastructure Levy ('CIL') to those set out in the Council's adopted CIL Charging Schedule.

Affordable Housing

3.2.70 The study appraised residential schemes with a range of affordable housing percentages from 0% to 50% reflecting the proposed tenure split (55% social rent, 25% affordable rent and 20% intermediate accommodation)) to test the 35% target percentage in the emerging Affordable Housing Policy.

3.2.71 The results do not point to any particular level of affordable housing that most schemes can viably deliver, and it is therefore recommended that the existing 35% target be retained and applied on a 'maximum reasonable proportion' basis taking site-specific circumstances into account.

3.2.72 However, while the evidence indicates there might be limited scope for some schemes to provide more than 35% affordable housing, there will be increasing pressure on development to contribute towards the UK's Net Zero Carbon commitments which will increase costs over time. It is likely that any additional development value will be required to satisfy these requirements, leaving little or no scope to increase affordable housing provision over the forthcoming plan period.

Net Zero Carbon

3.2.73 The emerging Plan Policy on Net Carbon Zero Development requires that developments deliver reductions in emissions through reduced energy use and reduced embodied carbon. The appraisal reflects the net zero carbon requirement through a 5% increase in construction costs (covering operational emissions) and 15% (that covers both operational emissions and embodied carbon). The study indicates that most developments will be able to meet net zero carbon in regard to operational emissions, but securing net zero carbon on embodied emissions will require trade-offs in terms of other policies (e.g. reduced affordable housing percentages in some cases). However, the cost of reducing both operational and embodied carbon emissions is likely to fall over time and the policy trade-offs required will abate over the plan period.

Biodiversity Net Gain

3.2.74 The study tested the emerging Plan Policy requirement that developments achieve Biodiversity Net Gain of 20%. The cost uplift arising from this requirement is relatively modest and the impact on residual land values can be readily absorbed without adversely impacting other policy objectives. There is very little difference in the impact between meeting 20% net gain and a lower net gain of 10% or 15% and therefore limited benefit in terms of increasing scope for the delivery of other policies through the adoption of lower BNG standards. However, the requirement for smaller sites has now been reduced to 15% to reflect the findings of the study and the proposed changes to the NPPF.

Water & Flood Risk

Water Supply

3.2.75 Along with the rest of the south-east and east of England, the Environment Agency classified Eastbourne and Wealden to be within an area of serious water stress in 2021. Water stress in this context applies to both the natural environment and to public water supplies, including how both are affected by climate change. A severe water stressed classification reflects that the household demand for water is a high proportion of effective rainfall that is available in the area to meet that demand.

3.2.76 Southern Water is responsible for providing sewerage and wastewater treatment for Eastbourne and Wealden. South East Water is responsible for supplying potable (drinking) water for Eastbourne and Wealden.

3 BASELINE INFORMATION

Water Cycle Study

3.2.77 A **Scoping Water Cycle Study (WCS), July 2026** has been produced by AECOM for Wealden District Council and Eastbourne Borough Council as part of the evidence base to inform the Spatial Strategy of the Councils' respective Local Plans. There are two stages to preparing a WCS as described in the Environment Agency guidance:

1. **Scoping** – to identify if the water infrastructure capacity and environmental capacity could constrain growth and if there are any gaps in the evidence to make this assessment
2. **Detailed** – to provide the evidence to inform an integrated water management strategy. The WCS will identify the water and flood management infrastructure to mitigate the risks from too little or too much water and identify what is needed to protect and enhance the water environment.

3.2.78 The objective of the WCS is to identify any constraints on planned housing and employment growth that may be imposed by the water cycle. The Scoping WCS has assessed the proposed growth in Wealden and Eastbourne as part of their developing Local Plans, and tested the growth at a high level against water services infrastructure (WSI) and environmental water capacity.

3.2.79 The Scoping WCS has identified several water environment and water infrastructure factors that have the potential to constrain future growth across Wealden and Eastbourne. Of particular note, is a shortfall of houses accounted for in the current South East Water (SEW) Water Resource Management Plan (WRMP) for the Wealden area, which indicates water supply is a potential constraint to future residential growth in Wealden. There is also insufficient headroom at a significant number of Wastewater Treatment Works (WwTW) to accommodate all proposed growth without additional investment.

3.2.80 Furthermore, there is a significant number of Combined Sewer Overflows (CSOs) within the Study Area, several of which discharge to coastal and inland water bodies. Data shows that many CSOs operate frequently during periods of heavy rainfall, contributing to water quality pressures and posing risks to designated bathing waters. Reducing reliance on CSOs will require a combination of network upgrades, surface water separation, and wider catchment interventions to manage stormwater more sustainably.

3.2.81 Further work is recommended to refine the calculations provided in the Scoping WCS and identify opportunities to increase capacity for the proposed growth in partnership with Southern Water. Consideration should be given to the impact on water quality of the receiving water bodies as a result of the proposed additional housing, including the treatment constraints of the WwTWs and timescale implications for the phasing of development.

3.2.82 Network capacity for strategic growth locations should also be considered including the potential to exacerbate pressures on storm water overflows. Methods and options for improving water efficiency and reducing Per Capita Consumption, as well as site-by-site opportunities for Nature Based Solutions to provide water management solutions should also be considered.

3.2.83 Liaison should be undertaken with SEW to discuss future supply options and constraints to understand how development can be phased with respect to any future proposals for water supply.

Flood Risk

3.2.84 The Strategic Flood Risk Assessment Level 1 Report (SFRA 1), March 2026 (JBA Consulting) provides a comprehensive and robust evidence base on flood risk issues to support the review and update of the planning policies for Wealden. This study has shown the most significant sources of flood risk across the borough are from fluvial, surface water, coastal and sewer flooding as summarised below.

- **Flood Risk Zones:** Most of Wealden is defined as Flood Zone 1, low probability of flooding from fluvial/tidal sources. There are recorded flooding incidents distributed across the District, with the highest numbers recorded in the areas around Forest Row, Crowborough, Uckfield, Heathfield, Lower Horsebridge and Wadhurst (Durgates). Large expanses of open land around Westham, the Pevensey Levels and Willingdon Levels in Wealden are also at risk of fluvial flooding. Pevensey Levels are potentially vulnerable to coastal flooding given the low-lying topography and reliance on flood defences.
- **Surface Water Flooding:** There are numerous flow paths of surface water flooding throughout the District ranging from high to low probability, predominantly concentrated along watercourses. Surface water modelling shows greater surface water flood extents by the coast in areas of flatter land, including Pevensey Bay and South Wealden.
- **Groundwater flooding:** Large areas of Wealden are areas of groundwater concern, particularly in the north and south of the District, whereas in the High Weald, steep topography and impermeable geology limit the areas of groundwater concern to the fluvial river basins where high water tables can lead to groundwater flood risk.
- **Sewer Flooding:** Sewer flooding occurs when intense rainfall overloads the sewer system capacity (surface water, foul or combined) and /or when sewers cannot discharge freely into watercourses due to high water levels for example during high tide when tide-locking may occur and is a known issue in Wealden. Historic sewer flooding incidents within south Wealden shows Lower Willingdon and Polegate have the greatest number of recorded sewer flooding incidents. Historic sewer flooding incidents within other parts of Wealden shows Heathfield, Uckfield, Forest Row and particularly Herstmonceux and Hailsham have had the greatest number of recorded sewer flooding incidents.
- **Climate Change:** Sea level rise with climate change is predicted to cause Flood Zone 3 to ingress further inland, covering all of the Pevensey Levels and threatening Hailsham. Due to the often-steep topography of river catchments in Wealden District, an increase in river flows with climate change is not predicted to increase the extent of flood risk in the District, except for the River Cuckmere and Knockhatch Stream at Hailsham and the River Medway at Forest Row. However, climate change is likely to increase flood frequency and the impact of a flood event and is likely to become more severe, as water depths, velocities and flood hazard increase.
- **Reservoirs:** There is a potential risk of flooding from 21 reservoirs both within the District and those outside. There are no records of flooding from reservoirs in the study area to date. The level and standard of inspection and maintenance required under the Reservoirs Act 1975 means that the risk of flooding from reservoirs is relatively low. However, there is a residual risk of a reservoir breach, and this risk should be considered in any site-specific Flood Risk Assessments (where relevant).

3.2.85 A Strategic Flood Risk Assessment Level 2 (SFRA 2) has also been carried out (July 2026). The primary purpose of the SFRA Level 2 is to provide an appropriate understanding of the level of flood risk affecting development included in the updated Local Plan. Where land outside Flood Zones 2 and 3 cannot accommodate all necessary development it creates the need to apply the NPPF's Exception Test. In these circumstances the assessment should consider the detailed nature of the flood characteristics within a Flood Zone and assessment of other sources of flooding.

3.2.86 The assessment takes into account all sources of flooding and considers other factors affecting flood risk such as residual risk. The information provided enables WDC to apply the Exception Test to sites in accordance with the National Planning Policy Framework (NPPF).

4 Issues & Objectives

4.1 Key Sustainability issues

4.1.1 The key Sustainability issues were identified through the consideration of the baseline information and Policies, Plans and Programmes at the Scoping Stage. The baseline information and the PPPs have been kept under review to inform the key sustainability issues facing the District as the Plan progresses. The key sustainability issues are set out in the adjacent table.

4.2 Sustainability Objectives

4.2.1 The key sustainability issues have been used to inform the Sustainability Objectives. The objectives were initially developed at the Scoping Stage in 2020/2021 and were then refined following 'The Direction of Travel' Consultation. As part of Scoping Report Update 2023/24, the SA Objectives have been further refined and updated to reflect policy and regulatory changes, the assessment of new baseline data and the findings of the further review of the PPPs.

4.2.2 The updated SA Objectives have also been informed by the specific sustainability topics within Schedule 2 of the SEA Regulations, which the Council is required to include. The SA objectives are distinct from the Local Plan objectives though they may in some cases overlap with them.

4.3 The SA Framework

4.3.1 The Sustainability Appraisal Framework (SA Framework) is used to assess the sustainability effects of the plan. The framework includes the sustainability objectives, decision making criteria and indicators to be used when undertaking the appraisal. The indicators should be measurable to provide a way of checking whether the objectives are being met, for example, the number of homes built. The SA Framework can be found at **Appendix 2** of this Report.

SUSTAINABILITY ISSUES	
POPULATION & COMMUNITY	A growing population will create a need for further housing and infrastructure including community infrastructure. An aging population is likely to increase demand in areas such as housing provision and health care services. There are some areas of deprivation within the District.
CLIMATE CHANGE	Challenging targets for emission reductions and emission reductions being too slow. Addressing the reliance on the private motorcar given the rural nature of the District. Balancing economic development alongside reducing greenhouse gas emissions. Ensuring that both existing and future development is protected from flood risk.
AIR, LIGHT & NOISE	Greater pressures on air quality and light pollution may occur through increases in development and increased traffic, which could lead to deteriorations in air and light pollution. An increase in development, if located inappropriately, may increase the potential for communities to be affected by noise.
HEALTH & WELLBEING	An increase in elderly residents (65+) and levels of people living with disability, long term illness and dementia. Health Care services and facilities as well as open spaces, sports and recreation facilities need to be available and accessible to all, taking into account increased demand from new housing.
HOUSING	The affordability of homes is an issue and there is a high demand for affordable housing (both rented and ownership). There is a need for older and specialist housing and the demand for this is likely to increase given the aging population. There is also a demand for more self-build / custom housing. There is a limited amount of Gypsy, Traveller and Travelling Showpeople Accommodation and demand to deliver new permanent pitches/plots.
EDUCATION & SKILLS	The District has a lower level of highly qualified residents (at level 4 or above) than the national average and there has also been a decrease in the number of apprenticeship completions. High house prices could lead to a shortage of key workers (i.e. teachers) particularly at the start of their careers, given the lower salaries on offer. There are constraints on availability of the workforce, skills and premises, which affects business performance and growth.
ECONOMY	Limited amount of flexible, modern, affordable business accommodation in the District. The average wage within Wealden has seen a decrease in recent years in comparison to the national average. Out-commuting for work is a considerable issue, which causes pressure on the transport network. Business, particularly small-to-medium sized enterprises (SMEs), need support to access and build skills, knowledge and capacity to reach net zero, and to minimise costs. The need to provide a greater variety and quantum of visitor accommodation to encourage overnight visitors who will financially contribute a greater amount to the economy. The District's town centres face threats from residents spending leakage to neighbouring areas
HISTORIC ENVIRONMENT	Large number of heritage assets within the District that require conservation and protection. There is a risk that adverse impacts could arise from development in the future.
SOIL LAND & MINERAL RESOURCES	Limited brownfield land in the District will result in development mostly on greenfield sites. Development on brownfield land or land at risk of contamination could cause the release of contaminants. Development could affect the availability of good quality agricultural land if this is not protected. The failure to protect soils in relation to compaction, erosion, disturbance could result in numerous adverse impacts such as the loss of carbon storage, the loss of biodiversity and the introduction of invasive species.
WATER RESOURCES	There is significant pressure on the region's water resources and water infrastructure, which is likely to increase with an increase in population. An improvement to the quality of water in water bodies is required to protect habitats and species and to achieve good ecological and chemical status. Development pressures result in greater areas of hard / impermeable surfacing being created which exacerbate surface runoff and the conveyance of chemicals / pollutants to water bodies.
BIODIVERSITY	International, national and local designated sites within the District may be at risk from damage as a result of development pressure and associated human disturbance. Greenfield development could contribute to biodiversity loss and fragmentation of habitats.
LANDSCAPE & TOWNSCAPE	New development has the potential to affect the High Weald National landscape, the setting of the South Downs National Park as well as other valued landscapes and townscapes including landscape features, character and local distinctiveness.
TRANSPORT & CONNECTIVITY	The rurality of the District brings challenges for transportation and connecting communities with employment, education, services and facilities. Nearly half of the District's population lives in rural or remote areas with no or very limited access to public transport. The network, frequency and connectivity of different services is currently poor. Transport infrastructure is at or near to capacity during peak times at certain locations / key junctions. There is poor broadband connectivity in some areas and the 4G mobile service lags behind the national average for coverage due to the rural infrastructure. There are constraints on the capacity and reliability of the Transmission Network Operators (TNOs) and Distribution Network Operators (DNOs) to enable sufficient EV charging infrastructure.
WASTE	An increase in households and businesses will lead to an increase in household waste generation including construction waste.

Figure 4.1: Key Sustainability Issues

5 Local Plan Vision & Objectives

5.1 The Vision and Objectives

5.1.1 The new Local Plan includes a Vision and Objectives for the District in 2040. The vision forms the basis on which the Strategic Objectives and the Plan's Policies are built.

5.1.2 To implement the Vision, a set of Objectives have been identified for the Local Plan through pre-production engagement with Members and the production of the SA Scoping Report Update.

LOCAL PLAN OVERARCHING VISION:

"

Through careful planning and stewardship, in 2042, Wealden District will be a place where our natural environment has been protected, restored and enhanced, supporting thriving landscapes, biodiversity and resilient ecosystems.

Wealden will be a safe, healthy and attractive place to live, with sustainable and inclusive communities, a high-quality built environment and a range of travel choices that support quality of life, social inclusion and community cohesion.

The District will be adapting to and mitigating the effects of climate change, whilst providing the homes, jobs, services, facilities and infrastructure needed to support communities.

Wealden will have a fair, resilient and sustainable economy that enables people and businesses to prosper, where residents and visitors will continue to enjoy the District's rich heritage, outstanding countryside, and extensive green and blue infrastructure.

"

5 LOCAL PLAN VISION & OBJECTIVES

5.2 Assessment of Vision and Objectives

5.2.1 The Vision and Objectives were assessed against the Sustainability Assessment framework to check their compatibility. A summary table of the results is provided below. The majority of the Vision and Objectives were found to have a major or minor positive impact against the sustainability objectives.

5.2.2 Some uncertainty was recorded for the vision and objectives (8), where the economic growth expected may have an adverse impact upon environmental factors and has not been addressed in these aspects of the vision and objectives. However, any negative impacts of growth has been addressed through the other Plan objectives and appropriate policies and mitigation measures within the Local Plan itself.

Table 5.1 Summary of Vision & Objectives SA Results

SUSTAINABILITY OBJECTIVES		Policy: Vision and Objectives							
		VO1	VO2	VO3	VO4	VO5	VO6	VO7	VO8
SO1	CLIMATE CHANGE MITIGATION								
SO2	CLIMATE CHANGE ADAPTATION								
SO3	FLOOD RISK								
SO4	WATER RESOURCES & QUALITY								
SO5	SOIL, LAND & MINERALS								
SO6	WASTE								
SO7	POLLUTION								
SO8	GREEN & BLUE INFRASTRUCTURE								
SO9	BIODIVERSITY								
SO10	LANDSCAPE & TOWNSCAPE								
SO11	HISTORIC & CULTURAL HERITAGE								
SO12	DIGITAL INFRASTRUCTURE								
SO13	TRANSPORT & ACCESSIBILITY								
SO14	HOUSING								
SO15	HEALTH & WELLBEING								
SO16	QUALITY OF LIFE & PLACE								
SO17	SOCIAL INCLUSION								
SO18	ECONOMY & EMPLOYMENT								
SO19	TOWN & VILLAGE CENTRES								
SO20	EDUCATION & SKILLS								

5 LOCAL PLAN VISION & OBJECTIVES

Vision	Objectives
Responding to the Climate Crisis	
1. We will have made significant progress towards being a net zero carbon District and we will be more prepared and resilient to the effects of the climate crisis through climate change prevention, adaptation and mitigation, including through nature-based solutions.	a. Create a climate resilient built and natural environment through mitigation, adaptation and nature-based solutions b. Reduce emissions and resource consumption while increasing renewable and low carbon energy c. Protect and enhance natural resources and minimise waste.
Protecting our natural environment and increasing biodiversity	
2. We will have conserved, restored and enhanced habitats and species, allowing them to thrive, halting species decline and contributing to nature recovery at a landscape scale. Our biodiversity rich and beautiful countryside, coastal and water environments will continue to define the district, and opportunities for people to access and engage with nature close to where they live will have been enhanced.	a. Protect, restore, enhance and connect habitats, species geodiversity, green and blue infrastructure, delivering biodiversity net gain and improving access to nature b. Protect and improve the quality and ecological function of our water environments.
Attractive and locally distinctive places	
3. New development will be attractive, will conserve and enhance our most valued landscapes, local distinctiveness and character, and will have created sustainable buildings and connected places that incorporate high-quality design, provide a strong sense of place and support community cohesion.	a. Conserve and enhance our historic environment and cultural heritage assets b. Protect and enhance the district's urban and rural landscape, including the High Weald National Landscape and the setting of the South Downs National Park c. Maintain and celebrate the District's rich heritage, culture and local distinctiveness d. Ensure that development is well-designed, of high quality, and inclusive, safe and accessible for all.
Delivering new homes for all	
4. We will have delivered new homes in the most accessible and sustainable locations and in a way that enhances and respects the distinctive qualities of our District.	a. Deliver high-quality, well-designed and energy-efficient new homes that meet local needs b. Boost the provision of affordable and specialist homes, ensuring that suitable homes are available for all sections of the community.
Supporting the delivery of infrastructure	
5. Infrastructure, services and community facilities have been delivered in a timely manner to support growth, meet the needs of existing and new communities, contributing to healthy, sustainable and well-connected places.	a. Work with partners to ensure the timely provision of infrastructure, services, facilities, community assets and green infrastructure to support existing and future communities b. Protect and support the improvement of infrastructure, services, facilities, community assets and green infrastructure c. Protect and improve the provision of sport, leisure and recreation facilities.
Living safe, inclusive and healthy lives	
6. Sustainable transport and walkable, wheeling- and cycle-friendly neighbourhoods have resulted in positive outcomes for climate change, improved health and inclusion, and enabled communities to meet their daily needs locally.	a. Provide a safe, sustainable and accessible transport network that supports low and zero emission vehicles, integrates different modes of transport and improves walking, wheeling and cycling connections b. Reduce health inequalities and improve health, wellbeing and quality of life c. Maximise opportunities for social interaction, enhance mental and physical wellbeing, and reduce social exclusion d. Facilitate efficient patterns of movement that provide access to employment, services, facilities and other day-to-day needs.
Vibrant town and local centres	
7. Our towns and village centres will be supported by both existing and future communities and will continue to contribute positively to the character and identity of the district. They will function as vibrant and attractive destinations, providing a focus for community life, services, businesses and visitors.	a. Ensure that new and existing communities can easily access and support town and local centres through sustainable modes of transport, including public transport, walking, wheeling and cycling b. Maintain and strengthen the role and function of town and local centres by supporting a diverse range of town centre uses c. Ensure that development makes a positive contribution to the distinctive character, appearance and public realm of town and local centres.
Supporting a sustainable and prosperous economy allowing people to live well	
8. We will have a prosperous and resilient local economy, provided new sites and opportunities to meet the needs of existing and future businesses, and have well-paid jobs, supporting the prosperity of our communities.	a. Support a prosperous, resilient, inclusive and diverse economy that provides opportunities for all b. Provide, retain, and enhance employment areas and premises to support investment, business growth, innovation and productivity c. Align workforce skills with employer needs, support increases in productivity and wages and reduce the need for out-commuting d. Support business start-ups, rural diversification and the transition to sustainable and circular business practice e. Strengthen the District's tourism, cultural and visitor economy offer and improve sustainable access to attractions.

SPATIAL STRATEGY

6 Spatial Strategy

6.1 Spatial Option Overview

6.1.1 The Spatial Strategy and associated strategic policies aim to deliver the Local Plan's vision and objectives by guiding development to the right locations and delivering sustainable growth, which takes account of people, places and the environment.

6.1.2 The Spatial Strategy is based upon focusing growth in and around sustainable settlements (including strategic extensions), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Tunbridge Wells), whilst also seeking to limit growth in those sustainable settlements that are located within or washed over by the High Weald National Landscape (HWNL) designation.

6.1.3 Under the SA Regulations, there is a requirement to consider 'reasonable alternatives' when undertaking the assessment and to set out an outline of the options considered and the reasons for their selection or rejection.

6.2 Regulation 18(1) Options

6.2.1 At the regulation 18(1) stage of the Local Plan seven options were considered for the Spatial Strategy. The option of 'do nothing' or 'no new plan' was not considered a 'reasonable alternative' as it would not address the need to plan for the required housing and economic growth in the District or address recent changes in planning and environmental legislation and guidance.

Regulation 18(1) Spatial Options

Spatial Option A
To maximise growth in all locations within the District to meet the Council's housing and employment needs requirement.
[c.20,250 (net) dwellings]

Spatial Option B
To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells).
[c.15,750 (net) dwellings]

Spatial Option C
To focus growth outside of the High Weald National Landscape, within sustainable settlements in the Low Weald (i.e. Uckfield, Hailsham, Polegate and Willingdon and other villages).
[c.15,000 (net) dwellings]

Spatial Option D
To focus growth on the delivery of new strategic extensions at existing sustainable settlements. Continue to support growth through windfalls at those settlements.
[c.15,500 (net) dwellings]

Spatial Option E
To maximise growth in all locations within the District to meet the Council's housing and employment needs requirement and to meet a small proportion of Eastbourne's unmet housing needs.
[c.21,200 (net) dwellings]

Spatial Option F
To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells), with limited employment growth (i.e. without Ashdown Business Park).
[c.15,750 (net) dwellings]

Spatial Option G
Combined option of B and D.
[c.17,750 (net) dwellings]

SPATIAL OPTION A

- Delivers c. **20,250 (net) dwellings** in or surrounding sustainable settlements, c. 450 dwellings over Wealden District's overall housing need.
- Meets the full employment needs of the District and improve town and village centres through new jobs and homes.
- Major negative impacts of growth on the landscape of Wealden (including the High Weald National Landscape).
- Significant highway constraints along the SRN/MRN.

SPATIAL OPTION B

- Delivers c.**15,750 (net) dwellings** in sustainable settlements, c. 4,000 dwellings short of overall housing need.
- Meets the full employment needs of the District and improve town and village centres through new jobs and homes.
- No major negative impacts
- Minor negative impacts for climate change mitigation, waste, pollution, biodiversity, landscape and heritage, although mitigation measures likely for some or all of these issues.
- Employment site at Ashdown Business Park currently uncertain, further work on this and other options for employment growth to be considered at the Regulation 19 stage.

SPATIAL OPTION C

- Delivers c. **15,000 (net) dwellings** in sustainable settlements, c. 4,800 dwellings short of the overall housing need, the least of any option considered.
- Meets the full employment needs of the District and improves the town and village centres through new jobs and homes, at least within the Low Weald.
- No major negative impacts
- Minor negative impacts for climate change mitigation, waste, pollution, biodiversity and social deprivation.

SPATIAL STRATEGY: REGULATION 18(1)

SPATIAL OPTION D

- Delivers c. **15,500 (net) dwellings** in sustainable settlements, c. 4,300 dwellings short of overall housing need.
- Meets the full employment needs of the District and improve the town and village centres through new jobs and homes.
- No major negative impacts
- Minor negative impacts for climate change mitigation, waste, pollution, biodiversity, landscape and heritage. Mitigation measures may be possible.
- Employment site at Ashdown Business Park and also a large mixed-use site, 'West of Uckfield' or Owlsbury are currently uncertain.

SPATIAL OPTION E

- Delivers c. **21,200 (net) dwellings** in or surrounding sustainable settlements, c. 1,400 dwellings over Wealden District's overall housing need
- Meets the full employment needs of the District and improve the town and village centres through new jobs and homes.
- Major negative impacts of this growth, namely the impact on the landscape of Wealden (including the High Weald National Landscape), the historic environment and pollution. There are also significant highway constraints within the District for growth along the SRN/MRN.
- The initial transport modelling work shows that it is unlikely that mitigation at junctions along the SRN/MRN will be achievable for all sites.

SPATIAL OPTION F

- Delivers c. **15,750 (net) dwellings** in sustainable settlements, c. 4,000 dwellings short of the overall housing need.
- Will not deliver the full employment needs of the District and will be 68,000 sqm short of the overall need for B2 and B8 uses (when accounting for completions). The option will continue to improve town and village centres through new jobs and homes.
- No major negative impacts, although minor negative impacts do occur for climate change mitigation, waste, pollution, biodiversity, landscape and heritage and social deprivation.
- Mitigation measures possible.

SPATIAL OPTION G

- Delivers c.**17,750 (net) dwellings** in or surrounding sustainable settlements, c. 2,000 dwellings short of the overall housing target
- Meets the full employment needs of the District and will improve town and village centres through new jobs and homes.
- No major negative impacts
- Minor negative impacts for climate change mitigation, soil, land and minerals, waste, pollution, biodiversity, landscape and heritage
- Mitigation measures possible.
- Employment site at Ashdown Business Park and also a large mixed-use site, 'West of Uckfield' are currently uncertain.

6.3 Selection and Rejection of Options

6.3.1 As a result of the Sustainability Appraisal of options, **Option F** was considered the Preferred Option at the Regulation 18 (1) stage in the Local Plan process. However, it was concluded that **Options B, D and G** should be included for further consideration alongside **Option F** at the next stage of the Local Plan once further work had been carried out, which would provide greater certainty in determining the effects. Options A, C and E were not considered suitable and were not included for further consideration.

6.3.2 Since the preparation of the Regulation 18(1) Local Plan and SA it was decided that a further consultation on the draft Local Plan [**Regulation 18 (2)]** should be prepared to take account of the changes to policies and regulations, specifically the NPPF 2024 and changes to housing need and transport modelling, before proceeding to the Regulation 19 stage of the process.

6.3.3 Revised Spatial Options for the Local Plan were therefore considered and are set out in **Section 7** of this report.

7 Spatial Strategy Regulation 18(2)

7.1 Regulation 18(2) Options

7.1.1 Following the publication of the Regulation 18(1) Draft Local Plan and SA in March 2024 key changes occurred, which needed to be taken into account in the Spatial Strategy, as a result of the revised NPPF (December 2024):

- **Housing Need Calculation** - increase in the housing need for the District.
- **Transport Modelling** - a move to a 'vision and validate' approach, instead of 'predict and provide'.

7.1.2 The representations to the Regulation 18(1) were also taken into account, some of which identified the need for further Housing and Employment Allocations, in contrast to others which were concerned that there was too much development proposed (**see Appendix 3 - Reg. 18(2) SA Report - Part 1, January 2026**). Updates were also made to the evidence base.

7.1.3 A further SA Report (January 2026) was prepared in support of the 'Focused' Review of the Local Plan (Regulation 18(2), February 2026), which built upon the findings of the Regulation 18(1) SA and the Preferred Option **(F)** for the proposed Spatial Strategy.

Spatial Option F - Reg. 18 (1)

To focus growth in and around all sustainable settlements (as defined in the Sustainable Settlement Strategy), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells), with limited employment growth (i.e. without Ashdown Business Park).

7.1.4 Four options were considered as part of the Regulation 18 (2) 'focused' draft Local Plan, which were tested as 'reasonable alternatives' for the purposes of the SA.

7.1.5 The options were drawn up prior to the SA of the strategic and smaller sites and it was recognised that it may be subject to further change following consideration of the results and further evidence at the Regulation 19 stage. A summary of the key components of the options is summarised in **Figure 7.4**.

HOUSING NEED:

Total Homes - 24,769 (net) homes

Completions + Commitments - 7,845 (net) homes

Windfalls - c. 2,000 homes

Residual Need - 14,924 homes

EMPLOYMENT NEED:

Total Employment - 194,400 sqm

Residual Need - 167,290 sqm

[+ Potential Eastbourne Need - 23,184 sqm]

OPTION 1: 15,612 homes (63% Housing Need)
+ employment 175,421 sqm (90% Employment Need)

OPTION 2: 19,011 homes (77% Housing Need)
+ employment 205,421 sqm (106% Employment Need)

OPTION 3: 22,211 homes (90% Housing Need)
+ employment 262,421 sqm (135% Employment Need)

OPTION 4: 24,911 homes (100.6% Housing Need)
+ employment 315,921 sqm (163% Employment Need)

Figure 7.1: Local Plan Regulation 18(2) - Spatial Strategy Options

7 SPATIAL STRATEGY : REGULATION 18(2)

7.2 Options 1 and 2

7.2.1 **Option 1** proposed **15,612** (net) homes + **175,421 sqm** employment land, including 1,525 homes at Owlsbury (Ref. **1061/1410)** and 60,000 sqm of employment space at Ashdown Business Park **(Ref. 980/3120**). Whilst this option would have the least impact upon the landscape and character of the existing settlements it was not considered a 'reasonable alternative' for the following reasons:

- The options would fail to meet both the housing need (63%) and the employment need (90%) for the District.
- A lack of development would mean that improvements to infrastructure such as transport, education and community facilities would be less likely to be provided.
- Town centres and villages struggling with vitality and viability would not benefit from an increase in population and the potential for economic prosperity.

7.2.2 **Option 1** was **REJECTED** and not subjected to further assessment.

7.3 Options 2, 3 and 4

7.3.1 **Options 2 to 4** were considered in more detail as they were considered to be 'reasonable alternatives' for the Sustainability Appraisal. The key components and findings are summarised below and the detailed results are set out in the **Reg. 18(2) SA Report, January 2026 - Part 1 Sections 8-12.**

7.3.2 **Option 2** proposed **19,684** (net) homes + **205,421 sqm** employment land (excluding Owlsbury and Ashdown Business Park) but would fail to meet the District's Housing need. Although the District's employment need would be met the provision of unmet employment need for Eastbourne was uncertain. The option was considered likely to have more limited environmental impacts but would also have less beneficial social and economic impacts, as a result of a more constrained development strategy.

7.3.3 The assessment of the Options showed that **Options 3 and 4** were the best performing options for the Spatial Strategy in terms of meeting the District's housing and employment needs. Although **Option 3** allocates slightly less housing, a total of **22,211 homes**, as a result of the proposed phasing compared to compare to a total allocation of **26,382 homes** in **Option 4**.

7.3.4 Whilst **Option 4** provided a higher allocation, the expected delivery in the Plan period is expected to be about the same as Option 3, however Option 4 does identify sites for beyond the Plan period. It was therefore identified that consideration would need to be given to a balance between providing delivery within the Plan period and sites for future needs. It should also be noted that sites that are not allocated within this Local Plan could be considered in future Plans.

SPATIAL OPTION 1

Residential Development in / adjacent to Sustainable Settlements

ALL SITES IN REG 18(1)
+
UPDATED SITES / NUMBERS SINCE REG 18(1)
+
OWLSBURY (1,525 HOMES IN PLAN PERIOD)
+
ASHDOWN BUSINESS PARK EXTENSION (60,000 SQM)

TOTAL HOMES = 15,612 (63% need)

TOTAL EMPLOYMENT = 175,421 sqm (90% need)

SPATIAL OPTION 2

Small & Medium Sites around Sustainable Settlements

ALL SITES IN REG 18(1)
+
UPDATED SITES / NUMBERS SINCE REG 18(1)
+
RECONSIDERS DISMISSED SITES FROM REG 18(1)
+
WEST OF POLEGATE (1,075) HOMES
+
SMALL/ MEDIUM SITES FOR EMPLOYMENT ALONG A22 - AROUND HELLINGLY, LOWER DICKER
-
SITES PREVIOUSLY REJECTED WITHOUT PP
-
DOES NOT INCLUDE OWLSBURY (1,525 HOMES)
-
DOES NOT INCLUDE ASHDOWN BUSINESS PARK EXTENSION (60,000 SQM)

TOTAL HOMES = 19,684 (79.5% need)

TOTAL EMPLOYMENT = 205,421 sqm (106% need)

SPATIAL OPTION 3

Small & Medium Sites + Significant Extensions to Existing Settlements

ALL SITES IN REG 18(1)
+
UPDATED SITES / NUMBERS SINCE REG 18(1)
+
RECONSIDERS DISMISSED SITES FROM REG 18(1)
+
OWLSBURY (1,525 HOMES) WEST OF HAILSHAM (1,500 HOMES) AND WEST POLEGATE (1,075 HOMES)
+
ASHDOWN BUSINESS PARK EXTENSION (60,000 SQM)
+
NORTH OF POLEGATE (87,000 SQM)

[POTENTIAL EASTBOURNE NEED (23,184 SQM)]

TOTAL HOMES = 22,211 (90% need)

TOTAL EMPLOYMENT = 262,421 sqm (135% need)

SPATIAL OPTION 4

Small & Medium Sites + Hesmonds Stud + Laughton New Villages

ALL SITES IN REG 18(1)
+
UPDATED SITES / NUMBERS SINCE REG 18(1)
+
RECONSIDERS DISMISSED SITES FROM REG 18(1)
+
OWLSBURY (1,525 HOMES) WEST OF HAILSHAM (1,500 homes) + HESMONDS STUD (925 homes in Plan period, 3,000 Total), LAUGHTON (925 homes in Plan period, 4,000 Total)
+
ASHDOWN BUSINESS PARK EXTENSION (60,000 SQM)
+
NORTH OF POLEGATE (87,000 SQM)
+
ADDITIONAL EMPLOYMENT FROM NEW SETTLEMENTS (53,500 sqm)

[POTENTIAL EASTBOURNE NEED (23,184 SQM)]

TOTAL HOMES = 26,382 (100.5% need)

TOTAL EMPLOYMENT = 315,921 sqm (163% need)

Figure 7.2: Local Plan Regulation 18(2) - Spatial Strategy Options Details

7 SPATIAL STRATEGY: REGULATION 18(2)

Option 1

Growth to Market Towns/ settlements + Owlsbury + Ashdown Business Park



Homes 15,612
Employment 175,421 sqm

KEY ISSUES:

- **HOUSING** - 63% of District's need met, 0% additional provision for neighbouring authorities
- **EMPLOYMENT** - 90% of identified need within District met
- **TRANSPORT** - less pressure on transport network but less opportunity for modal shift
- **POLLUTION** - less pollution from construction, transport, new development
- **LANDSCAPE** - Development directed to least sensitive areas
- **STRATEGIC SITES** -
  - Owlsbury- 1,525 homes within Plan period
  - Ashdown Business Park - 60,000 sqm employment.

Option 2

Growth to Market Towns / Semi-dispersed growth - Owlsbury - Ashdown Business Park + Employment space along the A22



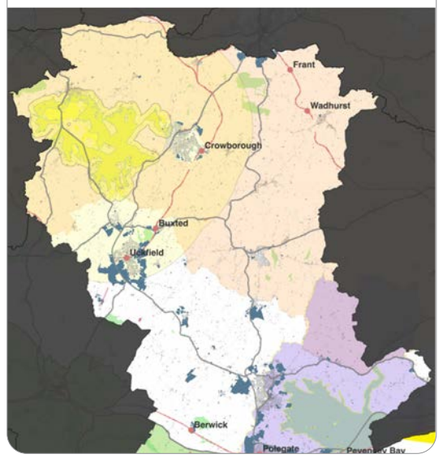
Homes 19,011
Employment 205,421 sqm

KEY ISSUES:

- **HOUSING** - 77% of District's need met, 0% additional provision for neighbouring authorities
- **EMPLOYMENT** - 106% of identified need within District met
- **TRANSPORT** - less pressure on transport network but less opportunity for modal shift
- **POLLUTION** - less pollution from construction, transport, new development
- **LANDSCAPE** - Development directed to least sensitive areas
- **STRATEGIC SITES** -
  - West of Polegate - 230 homes
  - Employment space along the A22 - 90,000 sqm employment.

Option 3

Growth to Market Towns + Large Extensions to Existing Settlements + Owlsbury West of Polegate + Ashdown Business Park + North of Polegate



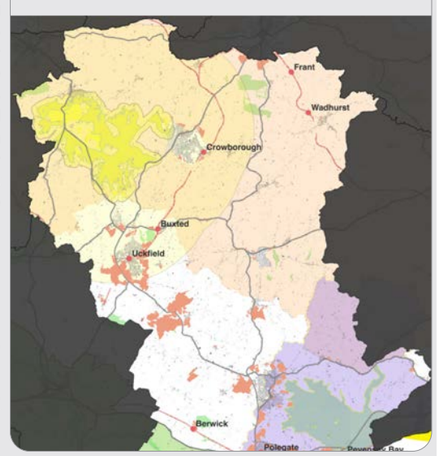
Homes 22,211
Employment 352,421 sqm

KEY ISSUES:

- **HOUSING** - 90% of District's need met, 0% additional provision for neighbouring authorities
- **EMPLOYMENT** - 135% of identified need within District met with potential to meet unmet employment needs elsewhere
- **TRANSPORT** - some increased pressure on transport network, and potential for modal shift
- **POLLUTION** - increase in pollution from construction, transport, new development, which will need mitigation
- **LANDSCAPE** - Development directed to least sensitive areas but will encroach on some areas of moderate to high sensitivity
- **STRATEGIC SITES** -
  - Owlsbury - 1,525 homes within Plan period
  - West of Polegate -1,075 homes
  - Ashdown Business Park - 60,000 sqm employment
  - North of Polegate - 87,000 sqm employment

Option 4

Growth to Market Towns + Large Extensions to Existing Settlements + Village Settlements Hesmonds Stud Laughton + All employment space



Homes 24,911
Employment 405,921 sqm

KEY ISSUES:

- **HOUSING** - 100% of District's need met + 0.6% additional provision for neighbouring authorities
- **EMPLOYMENT** - 163% of identified need within District met with potential to meet unmet employment needs elsewhere
- **TRANSPORT** - increased pressure on transport network but potentially more opportunity for modal shift.
- **POLLUTION** - increase in pollution from construction, transport, new development which will need mitigation
- **LANDSCAPE** - Development will encroach on some areas of moderate to high sensitivity and areas of open countryside which could significantly change character of area in secondary villages
- **STRATEGIC SITES - As Option 3 (- West Polegate) +**
  - West of Hailsham - 1,450 homes within Plan period
  - Hesmonds Stud - 925 homes + 23,500 sqm employment
  - Laughton Park Farm - 925 homes + 30,000 sqm employment.

Figure 7.3: Local Plan Regulation 18(2) - Summary of Spatial Strategy Options

8 Spatial Strategy

8.1 Approach to Spatial Strategy

8.1.1 The Spatial Strategy has been drawn up with full consideration of the constraints and opportunities facing the District through the evidence base prepared for the Local Plan. The different options for the Spatial Strategy have then been tested in the SA to determine the **'likely significant impacts**' of the Plan. The factors affecting the strategy are set out below. Details of the baseline information can be found in the **Scoping Report, 2024** and **Section 3** of this report.

8.2 Revised Spatial Strategy

8.2.1 The SA Report prepared in support of the **'Focused' Review of the Local Plan (Regulation 18(2))** considered four spatial options, which were tested as 'reasonable alternatives' for the purposes of the SA. The Spatial Strategy options were identified before the SA of sites was undertaken and before the revised Economic Strategy, Landscape, Transport and other evidence was available.

8.2.2 The findings of the SA at Reg 18(2) were used to inform the **'Focused' Review of the Local Plan, February 2026** and the decision making process to allocate sites. Following the assessment of sites within the SA and findings of the Economic evidence, the 'Focused' Review of the Local Plan set out 2 alternative options:

- **Option 1 - 16,609 (net) homes (67% of need) + 159,530 sqm employment land (82% of need)**
- **Option 2 - 15,109 (net) homes (60.1% of need) + 159,530 sqm employment land (82% of need)**

8.2.3 The reduction in the amount of development presented in the Options of the 'Focused' review of the Local Plan resulted from the removal of 'uncertain' or 'possible' sites identified in the SA, where there was insufficient information available to propose an allocation. The responses to the consultation showed that there was some confusion regarding the approach taken in the 'Focused' review of the Local Plan, when compared to the SA results.

8.2.4 A further review of the Options for the Spatial Strategy and Housing Need has been carried out at the Regulation 19 stage, which has taken into account the representations received, as well as new evidence and site information that was not available at the Regulation 18 stage. Further details on the approach taken can be found in the Regulation 19 Local Plan and corresponding Topic Papers, which accompany the Plan and have been updated with the latest information.

8.2.5 A summary of the SA consultation responses can be found at **Appendix 3** of this report as well as the Consultation Statement of the Regulation 19 Local Plan.

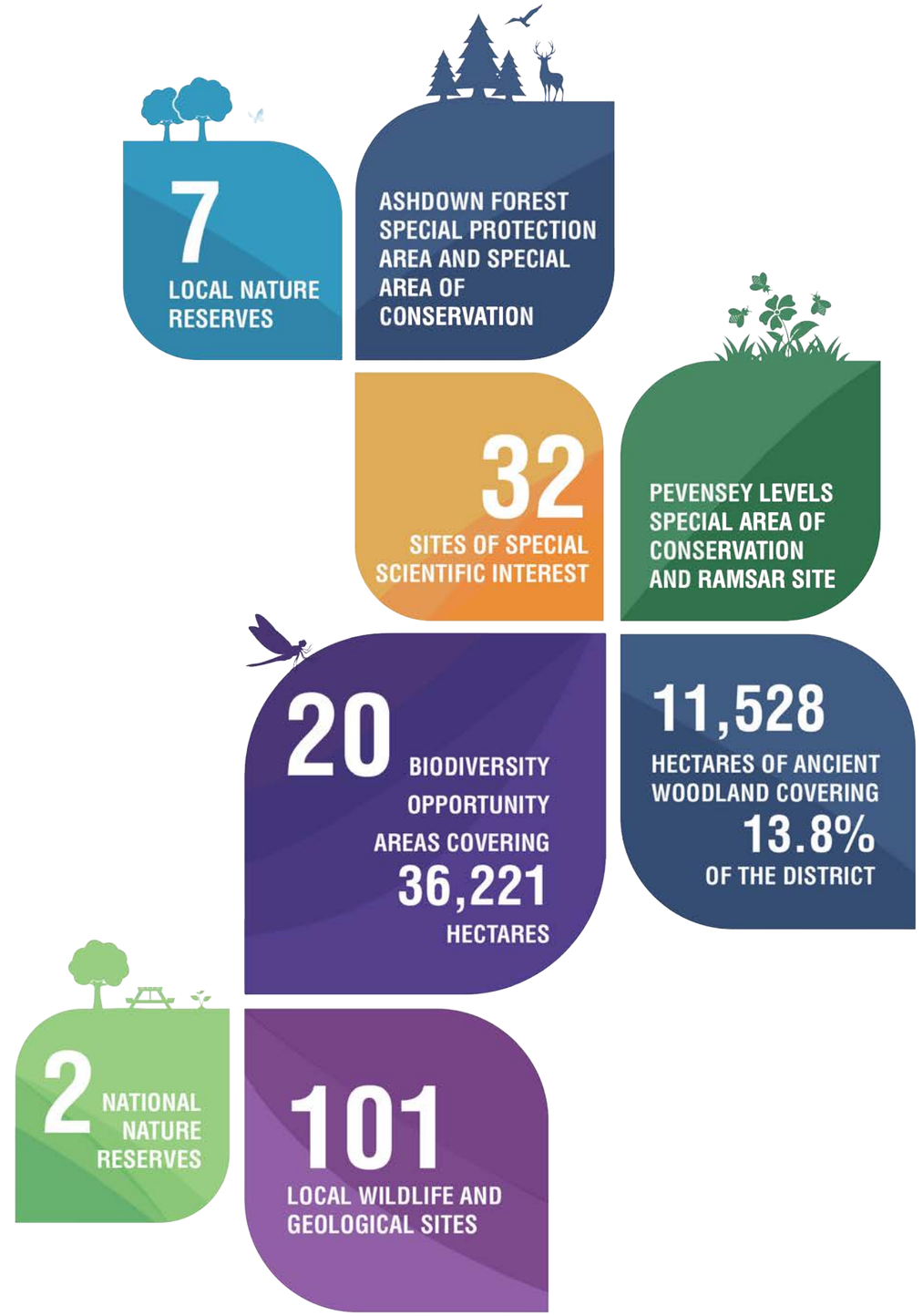


Figure 8.1: Environmental Designations in Numbers (Source: WDC Local Plan)

8 SPATIAL STRATEGY: REGULATION 19

8.3 Environmental / Landscape Designations

8.3.1 Wealden has a high-quality natural environment, reflected in the number of designations **(Figures 8.1 and 8.2),** which provide significant constraints to the location of development. Over 60% of the District is covered by protected landscape designations with around 53% of the District within the High Weald National Landscape and 7% within the South Downs National Park. Designations include:

- High Weald National Landscape (HWNL)
- Ashdown Forest Special Protection Area (SPA) / Special Area of Conservation (SAC)
- Biodiversity Opportunity Areas (BOA)
- Pevensey Levels SAC / Ramsar / Site of Special Scientific Interest (SSSI)
- South Downs National Park (SDNP)
- Flood Risk Areas.

8.4 Housing Need

8.4.1 As a result of changes to the NPPF (December 2024) the housing need for Wealden is now calculated (as per the 'standard method') at **1,465** dwellings per annum (dpa). This equates to **23,440 (net)** dwellings over the Plan period from 1 April 2026 to 31 March 2042, assuming adoption of the Local Plan in 2027. Commitments as of April 2026 account for **7,312** (net) dwellings and windfalls c.**1,724** dwellings.

8.4.2 The quantum of housing to meet housing need from all proposed allocations / suitable sites therefore equates to a residual need of **14,404** (after commitments and windfalls) over the lifetime of the Local Plan.

8.5 Employment Need

8.5.1 The Local Plan acknowledges that the District is part of several Functional Economic Market Areas (FEMAs), which includes Eastbourne to the south of the District. The previous Eastbourne Local Plan Growth Strategy Consultation (November 2022) identified that Eastbourne may have a shortfall in employment provision during their Plan period of some **23,184 sqm.** The Eastbourne Local Plan Consultation 2026 has removed this shortfall and states that the employment need can now be met.

8.5.2 An over estimate of the amount of employment need in Wealden was made at the Regulation 18(2) stage, including provision made for Eastbourne Borough Council, which is no longer required. In addition, the SA of sites found that the majority of sites along the A22 are not suitable for development.

8.5.3 Employment need for the District over the proposed Plan period is now identified as **47.8 hectares**, equating to **194,400 sqm** of floor space and a residual need for employment floor space based on current supply figures of **167, 290 sqm.**

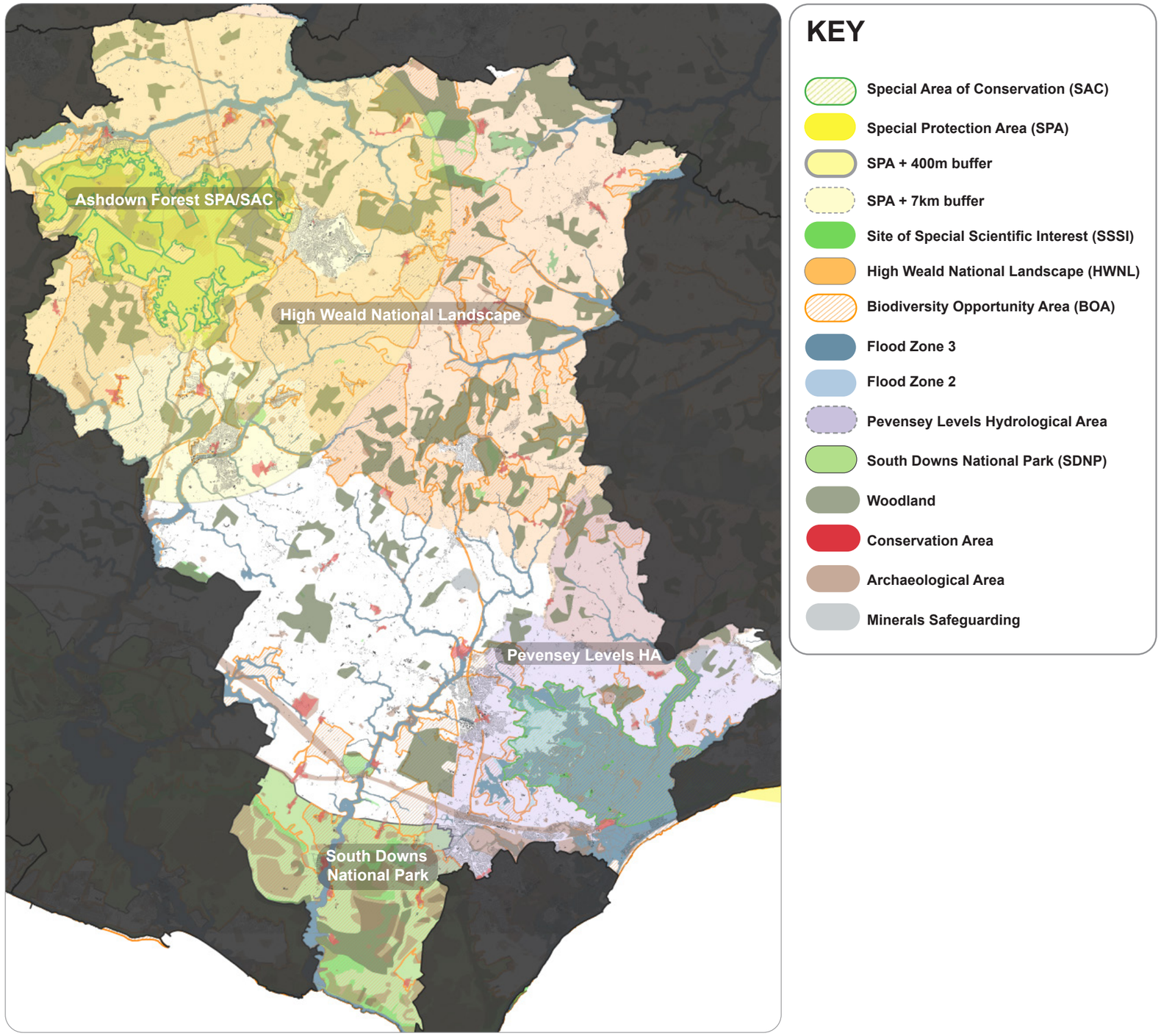


Figure 8.2: Wealden District - Environmental Designations and Constraints

8 SPATIAL STRATEGY : REGULATION 19

8.6 Transport

8.6.1 The District is connected to the Major Road Network (MRN) principally via the A22 and A26, which provide access to and between Eastbourne, Tunbridge Wells and East Grinstead, as well as providing links to Gatwick and London via the A23/M23 and M25. The A27 in the southern part of the District, provides connections with Lewes and Brighton and Hove.

8.6.2 The public transport network within the District is currently considered limited. There are bus and rail services for some settlements to neighbouring larger key destinations, such as Eastbourne, Brighton and Tunbridge Wells as well as some services to smaller towns. Whilst rail services run through the day and evening, bus services can be less regular, often providing a limited frequency, especially at weekends or in the evenings.

8.6.3 Wealden has a number of railway stations connecting Frant and Wadhurst as well as Uckfield, Buxted, Crowborough and Eridge to London. Services also connect Pevensey, Westham, Polegate and Berwick to Hastings, Eastbourne, Brighton and Lewes, with an onward journey from these stations via Lewes to Gatwick and London and Ashford via Hastings.

8.6.4 The 2026 analysis of the growth options indicates:

- **Highways Network** - The network could be at risk of increased congestion and delays on the A22 corridor, the A27 (Strategic Road Network (SRN)), the A2270 into Eastbourne, the A26 towards Lewes and at key junctions across the District in the future
- **Traffic** - The traffic generated by the proposed growth distribution would have the greatest impact on the A22, particularly on the section of single carriageway north of Hailsham, and the dual carriageway section to the south of Hailsham.
- **Mitigation** - Mitigation is likely to be needed to improve sustainable travel options and also at specific locations along key corridors, particularly on the constrained A22.

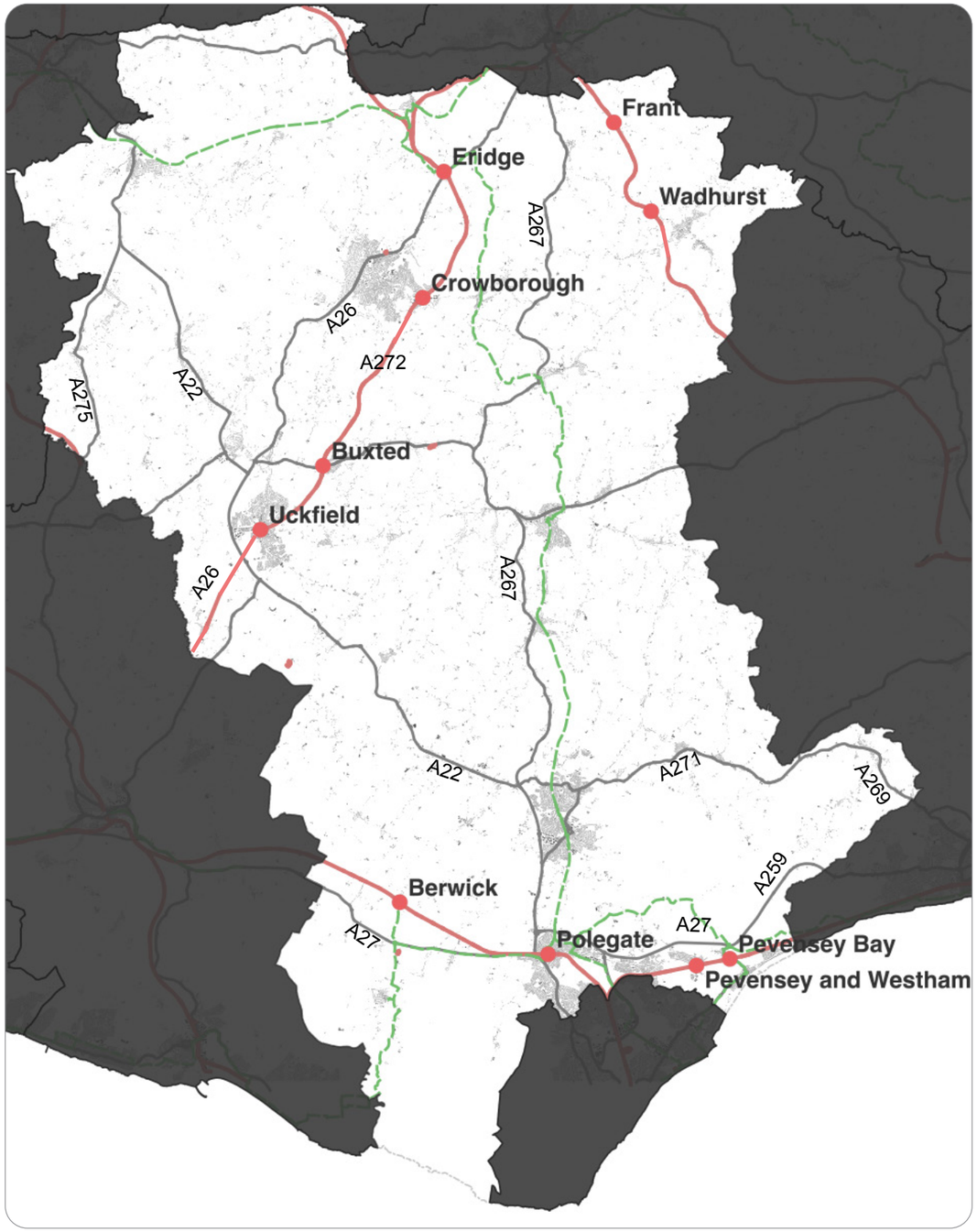


Figure 8.3: Wealden District - Key transport networks

BASELINE DATA

Further information on the baseline data for the District used in the SA is set out in the **Scoping Report March 2024** and **Section 3** of this report.

8 SPATIAL STRATEGY: REGULATION 19

8.7 Sustainable Settlements

8.7.1 The draft Local Plan identifies the following Settlement Hierarchy for the District, listed in order of most sustainable:

SETTLEMENT HIERARCHY	
TYPE 1 - Town	Crowborough, Hailsham, Heathfield, Uckfield
TYPE 2 - Settlements that relate geographically to regional centre outside the District	Polegate, Pevensey, Pevensey Bay, Stone Cross, Westham, Willingdon
TYPE 3 - Primary Village	Forest Row, Horam, Mayfield, Wadhurst
TYPE 4 - Secondary Village	Bells Yew Green, Berwick Station, Blackboys, Broad Oak, Buxted, Cross in Hand, East Hoathly, Five Ash Down, Framfield, Frant, Groombridge, Hartfield, Herstmonceux, Isfield, Laughton, Lower Horsebridge, Maresfield, Ninfield, Nutley, Rotherfield
TYPE 5 - Neighbourhood Settlement	Cade Street, Chelwood Gate, Coleman's Hatch, Danehill, Five Ashes, Eridge, Hadlow Down, Halland, Hellingly, High Hurstwood, Lower Dicker, Little Horsted, Mark Cross, Maynards Green, Punnetts Town, Rushlake Green, Selmeston, Upper Dicker, Upper Hartfield, Windmill Hill, Withyham
TYPE 6 - Residential Settlement	Arlington, Balls Green, Best Beech Hill, Blackham, Bodle Street Green, Boreham Street, Chalvington & Ripe, Chiddingly, Cowbeech, Cousley Wood, Fairwarp, Fletching, Hankham, Hooe, Magham Down, Muddles Green, Old Heathfield, Rosers Cross, Town Row, Vines Cross, Waldron, Warbleton, Wartling.

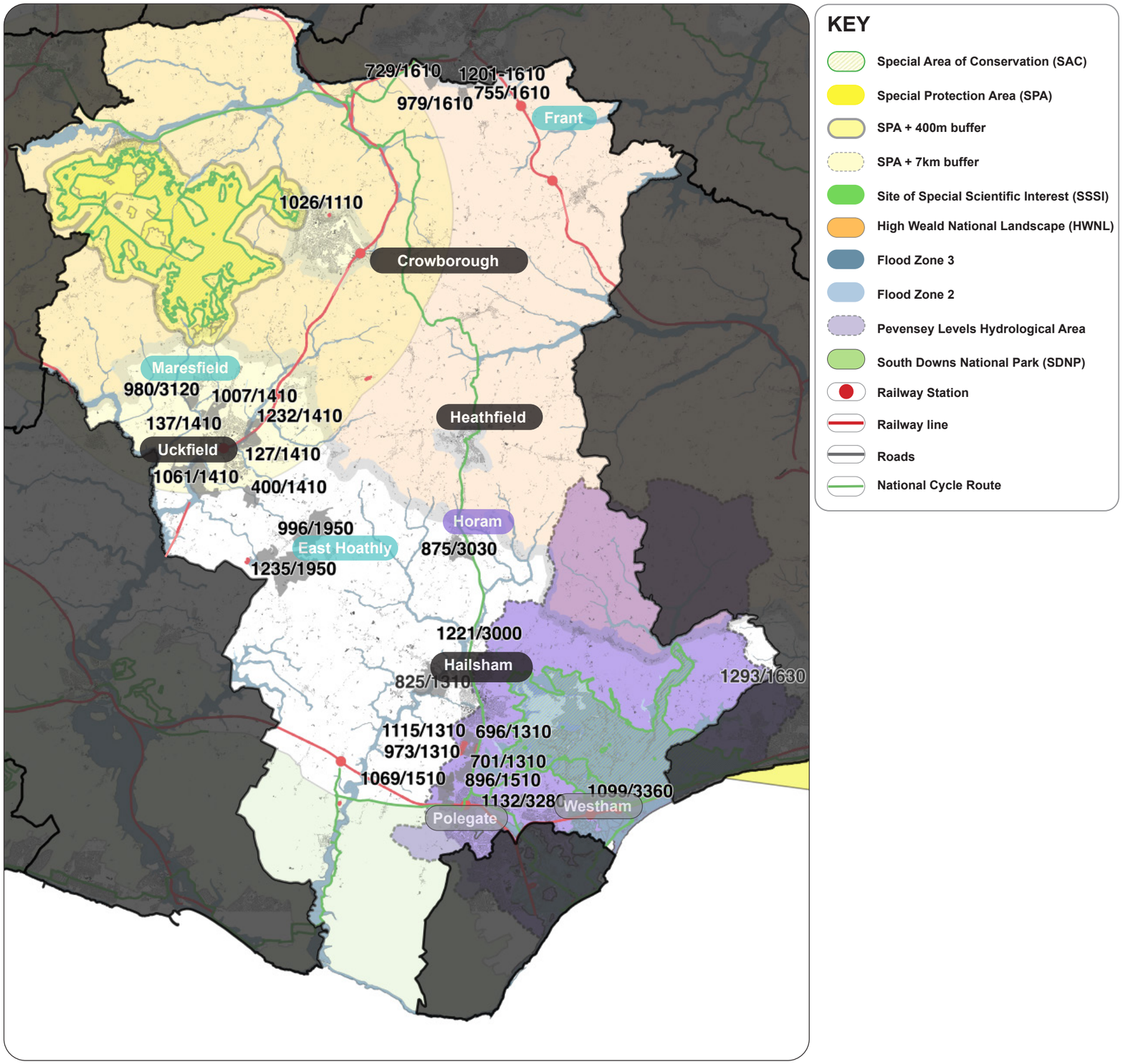


Figure 8.4: Wealden District - Settlement Hierarchy and Potential Strategic Sites

8 SPATIAL STRATEGY : REGULATION 19

8.8 Site Assessment Methodology

8.8.1 The sites submitted to the Council as part of the SHELAA were reviewed to identify if any sites, which were previously rejected, should be assessed again in the SA. A total of over 1,200 sites were submitted to the Council, of these c.130 sites were identified for re-assessment. The total sites includes new and amended sites, which have also been considered in the SA.

8.8.2 Given the quantum of sites, the assessment has been carried out by Parish, in order to consider the specific characteristics of each area and to understand the cumulative impacts of such development more clearly. Maps have been prepared for each Parish to capture the level of development proposed and environmental constraints in a more visual format, to aid understanding of the results. A summary of the SA results for the proposed allocations is provided by Parish in alphabetical order (see **SA Part 2: Parish Site Assessments Report, September 2026**).

8.8.3 It should be noted that the SHELAA is a live document and changes will have occurred since the SA was undertaken as a result of planning permissions being granted; sites being withdrawn or amended; or new sites coming forward. The SA has been updated at the **Regulation 19** stage to reflect any recent changes.

8.8.4 The SA for new or amended sites is set out in **SA Part 2: Parish Site Assessments, September 2026, Appendix A.** Sites which have been granted planning permission or have a resolution to grant permission are shown in **Appendix B** and rejected sites in **Appendix C.**

8.8.5 Detailed appraisals for the possible sites that were considered at Regulation 18(2) are set out by Parish in **SA Part 2: Parish Site Assessments - Appendix B, January 2026.**

8.8.6 Where sufficient information had not been made available or a clear conclusion could not be made, the result was scored uncertain at the Regulation 18(2) stage. Uncertain sites have therefore been reassessed as part of the **Regulation 19 SA.**

8.8.7 Sites that have been withdrawn, are under construction or are too small for assessment are not shown in the Parish table of sites but are included in the SHELAA, which will be published alongside the Regulation 19 Local Plan.

8.8.8 Following the Regulation 18(2) SA, additional sites were submitted to the Council for consideration, which have been have been included within the SA.

Strategic Sites

8.8.9 The Parish Assessments include a summary of the potential strategic sites for the Local Plan. These sites have been assessed in more detail, owing to the likely significant impacts that could result from larger development. A summary of the potential strategic sites considered is set out in **Section 8.9** of this report and the detailed results are set out in **SA Part 3: Strategic Site Assessments, September 2026.**

8.8.10 It should be noted that in all of the site assessments, minor negative effects are recorded against SO1 Climate Change and SO6 Waste because all development will result in a significant increase in carbon emissions and waste prior to mitigation and will therefore have a negative impact. However, relevant Local Plan policies will provide mitigation and any development will need to be in accordance with these policies to reduce impacts as far as possible. This applies to all sites assessed within all Parishes.

8 SPATIAL STRATEGY: REGULATION 19

8.9 Strategic Site Allocations

8.9.1 22 potential strategic sites were considered for allocation within the draft Local Plan Regulation 18(2). Following the consultation, an additional 4 strategic sites came forward, which have been included for assessment, providing a total of 26 strategic sites.

8.9.2 Details of the potential strategic sites considered in the development of the Spatial Strategy and the proposed quantum of development are set out in **Table 8.1,** which has been updated to take into account comments from the consultation and updates to the evidence base. The detailed SA results for the strategic sites have been updated to account for new information and are set out in **Part 3: Strategic Site Assessments, September 2026.**

8.9.3 **Table 8.1** shows the strategic sites which have been considered at each stage of the SA process, including the sites included within the Regulation 19 Local Plan identified for allocation. The results of the SA of the strategic sites has been used to inform the Spatial Strategy options (**see Sections 8.10 & 9-11**).

8.9.4 The Parish Assessments (**Part 2 of the SA**) include a summary of the potential strategic sites for the Local Plan. These sites have been assessed in more detail, owing to the likely significant impacts that could result from larger development.

Parish		Settlement	Ref. No.	Address	SA 18(1)		SA 18 (2)	FLP 18(2)	SA REG. 19
01	Arlington	Hailsham	825/1310	Land to north-west of Hempstead Lane	R		P	1,600 dw	R
02	Crowborough	Crowborough	1026/1110	Land at Beechenwood Farm	R		P	120 dw	120 dw
03	East Hoathly W/ Halland	East Hoathly	996/1950	Hesmonds Stud - 154/1950, 773/1950, 985/1950	R		R	925 dw	R
04	East Hoathly W/ Halland	East Hoathly	1235/1950	Land at Laughton Park Farm	-		P	925 dw 30,000 sqm	R
05	Framfield	Uckfield	127/1410	Land at Birds in Eye (North), Bird in Eye Hill	R		S	240 dw	215 dw
06	Framfield	Uckfield	400/1410	Land at High Cross Farm, Eastbourne Road	R		P	450 dw	R
07	Framfield	Uckfield	725/1410	Land at Hempstead Lane	-		P	300 dw	300 dw
08	Frant	Tunbridge Wells	729/1610	Land at Ramslye Farm (Spartsbrook Farm)	R		P	580 dw	300 dw
09	Frant	Tunbridge Wells	979/1610	Pinewood Farm, Frant Road	S		S	170 dw	170 dw
10	Frant	Tunbridge Wells	755/1610	Tunbridge Wells Rugby Club & Chase Farm	S		S	105 dw	100 dw
11	Frant	Tunbridge Wells	1201/1610	Tunbridge Wells Rugby Club & Chase Farm	R		S	240 dw	50 dw
12	Hailsham	Hailsham	931/1310	South of Summerhill Lane, Hailsham	-		-	-	R
13	Hailsham	Hailsham	1115/1310	Land east of A22, Hailsham	R	S	P	1,000 dw 16,750 sqm	0 dw 16,750 sqm
14	Horam	Horam	875/3030	Coxlow Farm, Horam Road	S		S	750 dw 4,000 sqm	750 dw 4,000 sqm
15	Hellingly	Hellingly	1221/3000	Chestnut Cross, Heelingly	-		-	-	R
16	Maresfield	Maresfield	980/3120	Ashdown Business Park Extension	R	P	60,000 sqm	48,000 sqm	45,000 sqm
17	Lunsford Cross	Ninfield	983/1630	Lunsford Cross Farm	-		-	-	334 dw
18	Polegate	Polegate	1069/1510	Polegate West	R		R	1075 dw	R
19	Polegate	Polegate	204/1510	Polegate West	R		R	230 dw	R
20	Polegate	Polegate	896/1510	Land at North Polegate, A22	R	S	87,000 sqm	87,000 sqm	63,000 sqm
21	Uckfield	Little Horsted	1061/1410	Owlsbury	R	S	1700 dw	1500 dw	1300 dw
22	Uckfield	Uckfield	137/1410	Downlands Farm, Uckfield	-		-	-	R
23	Uckfield	Ringles Cross	1007/1410	Land at White House Farm, London Rd	S		240 dw	240 dw	240 dw
24	Uckfield	Uckfield	1232/1410	Hempstead Farm, Uckfield	-	P	200 dw	134 dw	R
25	Westham	Westham	1099/3360	Land at Peelings Lane, Westham	S		150 dw	150 dw	150 dw
26	Westham	Stone Cross	1132/3280	Sharnfold Farm, Hailsham Rd, Stone Cross	S	S	350 dw	350 dw	350 dw

Table 8.5: Wealden District - Summary SA results of Strategic Sites in Local Plan Process with quantum of development

R	REJECT	S	SELECT	P	POSSIBLE	-	NOT ASSESSED

8 SPATIAL STRATEGY : REGULATION 19

PARISH		SETTLEMENT	REF. NO.	ADDRESS	DEVELOPERS' PROPOSALS	DEVELOPER / (AGENT)	SA REG. 18(1)	SA REG. 18 (2)	SA Reg. 19
01	**Arlington**	Hailsham	**825/1310**	**Land to north-west of Hempstead Lane**	1,500 homes in plan period (**Total 2,500**); 1 Primary School; New Community Facilities	(Stantec)	**Reject**	**Possible**	**Reject**
02	**Crowborough**	Crowborough	**1026/1110**	**Land at Beechenwood Farm**	120-150 dwellings; 1.79 ha green infra. & SANGS	Greymoor Homes	**Reject**	**Possible**	**Select**
03	**East Hoathly W/ Halland**	East Hoathly	**996/1950**	**Hesmonds Stud (sites 154/1950, 773/1950, 985/1950)**	925 homes in plan period (**Total 3,000**); 23,500 sqm emp.; 1 new primary / nursery provision; new secondary provision	Hesmond Studs (Parker Dann)	**Reject**	**Reject**	**Reject**
04	**East Hoathly W/ Halland**	East Hoathly	**1235/1950**	**Land at Laughton Park Farm**	925 homes in plan period (**Total 4,000**); 30,000 sqm employment; 2 primary schools; new community centre	South West Strategic Developments Ltd (Grass Roots Planning ltd)	-	**Possible**	**Reject**
05	**Framfield**	Uckfield	**127/1410**	**Land at Birds in Eye (North), Bird in Eye Hill**	240 homes; 1,000 sqm employment	Martin Grant Homes (Turley)	**Reject**	**Select**	**Select**
06	**Framfield**	Uckfield	**400/1410**	**Land at High Cross Farm, Eastbourne Rd**	450 homes	Thakeham	**Reject**	**Possible**	**Reject**
07	**Framfield**	Uckfield	**725/1410**	**Land at Hempstead Lane (NEW)**	300 homes; 1 2FE Primary school, Community Hub	Martin Grant Homes/Harcourt Developments (Turley)	-	**Possible**	**Select**
08	**Frant**	Tunbridge Wells	**729/1610**	**Land at Ramslye Farm (Spartsbrook Farm)**	700 homes; Community facilities	Dandara (Stantec)	**Reject**	**Possible**	**Select**
09	**Frant**	Tunbridge Wells	**979/1610**	**Pinewood Farm, Frant Road**	690 homes	(Savills)	**Select**	**Select**	**Select**
10	**Frant**	Tunbridge Wells	**755/1610**	**Tunbridge Wells Rugby Club & Chase Farm**	105 homes	Esquire Developments	**Select**	**Select**	**Select**
11	**Frant**	Tunbridge Wells	**1201/1610**	**Tunbridge Wells Rugby Club & Chase Farm**	240 homes; Redevelopment of Sports Pavilion / facilities	Esquire Developments	**Reject**	**Select**	**Select**
12	**Hailsham**	Hailsham **NEW**	**931/1310**	**South of Summerhill Lane, Hailsham**			-	-	**Reject**
13	**Hailsham**	Hailsham	**1115/1310**	**Land east of A22, Hailsham**	1,000 homes; 16,750 sqm employment	Polegate Land	**Rej** / **Sel**	**Possible**	**Select**
14	**Horam**	Horam	**875/3030**	**Coxlow Farm, Horam Road**	750 homes; 4,000 sqm emp.; 1,500 Community floorspace; 1 2FE Primary school; Community Hub; Country Park	Gladman Developments	**Select**	**Select**	**Select**
15	**Hellingly**	Hellingly **NEW**	**1221/3000**	**Chestnut Cross, Heelingly**	c. 280 homes with 35 % affordable provision		-	-	**Reject**
16	**Maresfield**	Maresfield	**980/3120**	**Ashdown Business Park Extension**	Employment (60,000 sqm)	Summerthorne Estates (MJB Architecture)	**Reject**	**Possible**	**Select**
17	**Ninfield**	Lunsford Cross **NEW**	**983/1630**	**Lunsford Cross Farm**	Development on c.10.87 ha of site for c. 334 homes; c.5% self build / custom build; 0.68 ha employment use; community uses; up to 2FE Primary school; 9.6 ha green infrastructure		-	-	**Select**
18	**Polegate**	Polegate	**1069/1510**	**Polegate West**	1,075 homes (**Total 1,500**)	Taylor Wimpey (Turley)	**Reject**	**Reject**	**Reject**
19	**Polegate**	Polegate	**204/1510**	**Polegate West**	230 homes	Taylor Wimpey (Turley)	**Reject**	**Reject**	**Reject**
20	**Polegate**	Polegate	**896/1510**	**Land at North Polegate, A22**	Employment (87,000 sqm)	Formula Land (Framptons)	**Reject**	**Select**	**Select**
21	**Uckfield**	Little Horsted	**1061/1410**	**Owlsbury**	1,525 homes in plan period (**Total 1,700**); 60 ha SANGS; emp. / community space; 1 2FE Primary School / nursery provision	Fairfax Properties (Enplan)	**Reject**	**Select**	**Select**
22	**Uckfield**	Uckfield **NEW**	**137/1410**	**Downlands Farm, Uckfield**	c.175 homes on southern part of the site (5.0 ha) or 2.1 ha later living facility with c.100 homes.		-	-	**Reject**
23	**Uckfield**	Ringles Cross	**1007/1410**	**Land at White House Farm, London Rd**	240 homes	-	**Select**	**Select**	**Select**
24	**Uckfield**	Uckfield	**1232/1410**	**Hempstead Farm, Uckfield**	200 homes; retirement care facility; improved sports provision	Hempstead Farm (DHA Planning)	-	**Possible**	**Reject**
25	**Westham**	Westham	**1099/3360**	**Land at Peelings Lane, Westham**	240 homes	Bellway (DHA Planning)	**Select**	**Select**	**Select**
26	**Westham**	Stone Cross	**1132/3280**	**Sharnfold Farm, Hailsham Rd, Stone Cross**	400 homes; 500 sqm open space / play space	(Ridge)	**Select**	**Select**	**Select**

Table 8.6: Wealden District - Summary SA results of Strategic Sites in Local Plan Process

8 SPATIAL STRATEGY : REGULATION 19

8.10 Spatial Strategy Options

8.10.1 The role of SA is to promote sustainable development by assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The SA can be used to test the evidence underpinning the Plan and help to demonstrate how the tests of soundness have been met. SA should be used to inform the decision-making process and help to demonstrate that the Plan is the most appropriate given the reasonable alternatives.

8.10.2 Following the previous stages of the SA and draft Local Plans, the options have been considered further as part of the Regulation 19 Stage of the process. The proposed Spatial Strategy combines elements of the options considered previously and reflects the most up to date evidence available, as well as the responses to the consultations and the SA of sites.

8.10.3 Two Options have been considered, which incorporate elements of the different Options presented throughout the SA process. Both Options are based around the preferred approach (**Option F**) established at Regulation 18(1), however the Ashdown Business Park extension has been included in both options.

'To focus growth in and around all sustainable settlements (as defined in the Sustainable Settlement Strategy), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells).'
Option F

8.10.4 The Spatial Options considered are therefore variants of **Option 3** presented at Regulation 18(2)**,** although both propose a reduced quantum of development overall to address issues presented in the evidence base.

8.10.5 The sites included within the Options have all been subjected to SA prior to the consideration of the Spatial Strategy to enable a more informed approach using the updated evidence base. As a result of the SA of Strategic Sites, ten sites are not recommended for selection, which has reduced the ability to meet the identified housing need for the District. The main reasons the sites have not been selected are as a result of the impact upon landscape, townscape, heritage, transport and the potential for coalescence. Details of the site assessments can be found in **Part 2: Parish Assessments** and **Part 3: Strategic Site Assessments, September 2026.** A summary table of the results is provided overleaf at **Table 8.8.**

Key Issues

8.10.6 Key issues which have been taken into consideration in the revised Spatial Strategy options include:

- ❑ Brownfield Land
- ❑ Climate Change
- ❑ Economy
- ❑ Habitats Regulations Assessment (HRA)
- ❑ Heritage
- ❑ Housing Need & Population Growth
- ❑ Infrastructure Capacity
- ❑ Landscape Character & Biodiversity
- ❑ Neighbouring Authorities
- ❑ Site Allocations
- ❑ Transport & Access
- ❑ Viability
- ❑ Water & Flood Risk
- ❑ Cumulative Impacts.

HOUSING NEED:

Total Homes - 23,440 (net) homes

Completions + Commitments - 7,312 (net) homes

Windfalls - c. 1,724 homes

Residual Need - 14,404 homes

EMPLOYMENT NEED:

Total Employment - 194,400 sqm

Large Commitments - 27,110 sqm

Residual Need - 167,290 sqm

OPTION 1: **15,728 homes (67.4% Housing Need)**
+ employment 197,780 sqm
(102% Employment Need)

OPTION 2: **16,833 homes (71.8% Housing Need)**
+ employment 197,780 sqm
(102% Employment Need)

Figure 8.7: Local Plan Regulation 19 - Spatial Strategy Options

8 SPATIAL STRATEGY : REGULATION 19

PARISH		SETTLEMENT	REF. NO.	ADDRESS	REGULATION 19 PROPOSED ALLOCATIONS	REG. 18	REG. 19	Option 1	Option 2
01	Arlington	Hailsham	825/1310	Land to north-west of Hempstead Lane	1,500 homes in plan (**Total 2,500**); 1 Primary School; Community Facilities	Possible	Reject		
02	Crowborough	Crowborough	1026/1110	Land at Beechenwood Farm	120-150 dwellings; 1.79 ha green infra. & SANGS	Possible	Select	120	120
03	East Hoathly	East Hoathly	996/1950	Hesmonds Stud	925 homes in plan (**Total 3,000**); 23,500 sqm emp; 1 primary / nursery / secondary provision	Reject	Reject		
04	East Hoathly	East Hoathly	1235/1950	Land at Laughton Park Farm	925 homes in plan (**Total 4,000**); 30,000 sqm emp; 2 primary schools; community centre	Possible	Reject		
05	Framfield	Uckfield	127/1410	Land at Birds in Eye (North), Bird in Eye Hill	240 homes; 1,000 sqm employment	Select	Select	161	215
06	Framfield	Uckfield	400/1410	Land at High Cross Farm, Eastbourne Rd	450 homes	Possible	Reject		
07	Framfield	Uckfield	725/1410	Land at Hempstead Lane	300 homes; 1 2FE Primary school, Community Hub	Possible	Select	225	300
08	Frant	Tunbridge Wells	729/1610	Land at Ramslye Farm (Spratsbrook Farm)	580 homes; Community facilities	Possible	Select	225	300
09	Frant	Tunbridge Wells	979/1610	Pinewood Farm, Frant Road	690 homes	Select	Select	90	120
10	Frant	Tunbridge Wells	755/1610	Tunbridge Wells Rugby Club & Chase Farm	105 homes	Select	Select	112	150
11	Frant	Tunbridge Wells	1201/1610	Tunbridge Wells Rugby Club & Chase Farm	240 homes; Redevelopment of Sports Pavilion / facilities	Select	Select		
12	Hailsham	Hailsham	931/1310	South of Summerhill Lane, Hailsham	Residential development	-	Reject		
13	Hailsham	Hailsham	1115/1310	Land east of A22, Hailsham	1,000 homes; 16,750 sqm employment	Select	Select	emp	emp
14	Horam	Horam	875/3030	Coxlow Farm, Horam Road	750 homes; 4,000 sqm emp; 1,500 sqm Community; 1 2FE Primary; Community Hub; Park	Select	Select	562	750
15	Hellingly	Hellingly	1221/3000	Chestnut Cross, Heelingly	c. 280 homes with 35 % affordable provision	-	Reject		
16	Maresfield	Maresfield	980/3120	Ashdown Business Park Extension	Employment (45,000 sqm)	Possible	Select	emp	emp
17	Lunsford Cross	Ninfield	983/1630	Lunsford Cross Farm	c. 334 homes; c.5% self build / custom build; 0.68 ha emp; community; 2FE Primary; GI	-	Select	330	330
18	Polegate	Polegate	1069/1510	Polegate West	1,075 homes (**Total 1,500**)	Reject	Reject		
19	Polegate	Polegate	204/1510	Polegate West	230 homes	Reject	Reject		
20	Polegate	Polegate	896/1510	Land at North Polegate, A22	Employment (63,000 sqm)	Select	Select	emp	emp
21	Uckfield	Little Horsted	1061/1410	Owlsbury	1,700 homes; 60 ha SANGS; emp. / com space; 1 2FE Primary/ nursery	Select	Select	975	1300
22	Uckfield	Uckfield	137/1410	Downlands Farm, Uckfield	c.175 homes (5.0 ha) or 2.1 ha later living facility with c.100 homes.	-	Reject		
23	Uckfield	Ringles Cross	1007/1410	Land at White House Farm, London Rd	240 homes	Select	Select	150	240
24	Uckfield	Uckfield	1232/1410	Hempstead Farm, Uckfield	200 homes; retirement care facility; improved sports provision	Possible	Reject		
25	Westham	Westham	1099/3360	Land at Peelings Lane, Westham	150 homes	Select	Select	150	150
26	Westham	Stone Cross	1132/3280	Sharnfold Farm, Hailsham Rd, Stone Cross	350 homes; 500 sqm open space / play space	Select	Select	350	350

Table 8.8: Wealden District - Strategic Sites considered for Regulation 19 Spatial Strategy Options

9 Spatial Option 1:

9.1 Option Overview

9.1.1 The key elements of **Option 1** include:

- All Sites selected for allocation at Regulation 18(2)
- Updated information to take into account sites withdrawn, with planning permission or new numbers of dwellings
- Reconsideration of sites which were considered uncertain or possible at the Regulation 18(2) stage
- Inclusion of the 16 Strategic Sites proposed for allocation in **Table 8.3** above
- A 25% reduction in the quantum of housing development in areas where there may be a cumulative impact of development and/or impact upon the High Weald National Landscape.
- A total of **197,780 sqm** (102% emloyment need) of employment space, including: Ashdown Business Park Extension (45,000 sqm) and North Polegate (63,000 sqm).
- A total of **15,728 homes** (67.4% housing need), with a 25% reduction in the site allocations in Frant; Horam and Uckfield / Maresfield to address concerns regarding potential coalescence and cumulative impacts.

9.2 Key Issues

9.2.1 **Option 1** proposes 15,728 homes (67.4% housing need) and 197,780 sqm of employment land. This option includes a 25% reduction in the quantum of housing development in the parishes of Frant, Horam and Uckfield areas in response to issues raised in the consultation responses regarding the potential for cumulative impacts / coalescence with the surrounding settlements, as well as the potential for adverse impacts upon the High Weald National Landscape for the allocations within Frant. A reduction of 25 % in the overall allocations in the areas considered most sensitive to these issues has been made.

9.2.2 The option includes provision for 197,780 sqm of employment space or 102% of the estimated need. The overall quantum of employment provision has been reduced since the Regulation 18(2) stage as an over estimate of the amount of employment need was made, including provision for Eastbourne Borough Council, which is no longer required. The SA of sites also found that the majority of sites along the A22 are not suitable for development because of issues of access and pressure on the highway network, so these sites have been excluded. Ashdown Business Park extension has been included but with a reduced allocation of 45,000 sqm. A further reduction in the amount of employment allocations was not considered appropriate, in order to meet the need for employment space within the District.

9.2.3 Some new sites have also been considered, which were submitted after the Regulation 18(2) consultation. Other sites have been removed, which were either withdrawn, considered uncertain or which are no longer supported by the evidence.

SPATIAL OPTION 1

Small & Medium Sites + Significant Extensions to Existing Settlements

UPDATED SITES / NUMBERS SINCE REG 18(2)
+
RECONSIDERS DISMISSED SITES FROM REG 18(2)
+
25% OVERALL REDUCTION IN ALLOCATIONS IN FRANT, HORAM AND UCKFIELD AREAS

- ▷ **UCKFIELD / FRAMFIELD / MARESFIELD / LITTLE HORSTED (1,820 HOMES)**
- ▷ **FRANT (662 homes)**
- ▷ **HORAM (562 HOMES)**

+
ASHDOWN BUSINESS PARK EXTENSION (45,000 SQM)
+
NORTH OF POLEGATE (63,000 SQM)

TOTAL HOMES = 15,728 (67.4% need)
TOTAL EMPLOYMENT = 197,780 sqm (102% need)

Figure 9.1: Local Plan Regulation 19 - Spatial Strategy Option 1

9 SPATIAL STRATEGY : SPATIAL OPTION 1

9.3 Positive Impacts

9.3.1 Positive impacts are considered likely for:

- **HOUSING** - 15,728 homes or 67.4% of the District's housing need will be met, including provision for affordable housing and a mix of type and tenure. There will be less pressure from growth on existing settlements and the potential for coalescence.
- **ECONOMY AND EMPLOYMENT** - 197,780 sqm or 102% of the District's employment needs will be met, which will have a positive impact for the provision of employment and economic growth.
- **LANDSCAPE & TOWNSCAPE -** Development is directed to the areas of least sensitivity around the existing settlements, maintaining the existing character of the area as far as possible. The quantum of development has been reduced by 25% to address potential concerns regarding cumulative impacts particularly in relation to coalescence and impacts upon the High Weald National Landscape and other sensitive areas.
- **TRANSPORT** - The location of development will put less pressure on the existing transport network.
- **TOWNS & VILLAGES** - The impact of development in Uckfield/Maresfield, Frant and Horam will be reduced, which may result in less impact upon the character of the area.
- **GREEN & BLUE INFRASTRUCTURE -** Improvements to green and blue infrastructure are likely as a result of new development, including the need to meet the requirement for Biodiversity Net Gain (BNG).
- **FLOOD RISK -** The majority of development is located in Flood Risk Zone 1. Where development includes areas of flood or surface water flood risk, suitable mitigation measures will need to be identified.

9.4 Uncertain Impacts

9.4.1 The delivery of sites has an element of uncertainty, in particular the quantum of development that comes forward within the Plan period. The further evidence prepared in relation to the Transport modelling, Landscape Character and Habitats Regulations Assessment (HRA) has been used to refine the quantum of development within the specific site allocations.

9.4.2 The Scoping Water Cycle Study (WCS) has indicated that water supply is a potential constraint for future growth and that there is insufficient headroom at a significant number of Wastewater Treatment Works. Further work is recommended to refine the calculations provided in the Scoping WCS and identify opportunities to increase capacity for the proposed growth in partnership with Southern Water.

9.4.3 Consideration will also need to be given to the capacity of Education and Health provision and the need for additional services as part of the detailed proposals.

9.5 Negative Impacts

9.5.1 Negative Impacts are considered likely for:

- **HOUSING** - Provision will fall 32.6% below the level of need for the District and does not take into account housing need beyond the Plan period. The reduction in housing provision will exacerbate the housing deficit, particularly affordable housing provision. No provision is made for neighbouring authorities.
- **ECONOMY AND EMPLOYMENT** - The reduction in the quantum of housing development is likely to have a negative impact upon the viability of proposals, particularly the strategic sites, which need to provide substantial infrastructure to deliver suitable development and the necessary prosperity for the District.
- **LANDSCAPE & TOWNSCAPE** - Development will still have an impact on the open countryside and rural character of the area, including the setting of the South Downs National Park and High Weald National Landscape.
- **TRANSPORT** - The majority of development is situated within or adjacent to existing settlements, however, some of the major strategic sites included are not near a railway station and may encourage use of the private vehicle. There will be less opportunity to encourage modal shift through the provision of new infrastructure and services.
- **INFRASTRUCTURE -** The reduction in the quantum of development will mean that improvements to critical and essential infrastructure such as transport, education and community facilities are less likely to be provided.
- **TOWNS & VILLAGES -** The decrease in development could have a negative impact upon the vitality and viability of existing villages and centres as new facilities and services are less likely to be provided.
- **POLLUTION -** Development will result in an increase in light pollution in areas of 'darker skies'. Noise and air pollution will increase during construction but mitigation is considered possible
- **HISTORIC ENVIRONMENT** - The increase in development may lead to negative impacts upon designated heritage assets and their surroundings.
- **COMMUNITY** - The development may result in a slight increase in the provision of new services and facilities but is unlikely to provide the necessary growth to support new infrastructure.
- **CLIMATE CHANGE -** All development will result in an increase in carbon emissions and as a consequence there will be a negative impact upon climate change.
- **WASTE & MATERIALS -** All development will result in an increase in waste & materials and as a consequence there will be a negative impact upon waste.

9 SPATIAL STRATEGY : SPATIAL OPTION 1

9.6 Cumulative Impacts

9.6.1 The cumulative impacts are largely positive as the Option sets out a defined framework for the delivery of sustainable and high-quality development. Although the strategy meets the identified need for employment which will have a positive impact, it fails to meet the identified housing need of the District (32.6% below), which is likely to have a combined negative impact upon the delivery of jobs and infrastructure provision.

9.6.2 The level of growth has been reduced to try to balance the likely impact upon the natural environment, protected landscapes and the countryside including the potential for coalescence between settlements. Whilst there will undoubtedly be a positive impact for landscape, the viability of proposals and provision of suitable community facilities and services are likely to reduce. The reduction in housing development is therefore likely to add to the current housing crisis, particularly affordable housing, as well as reduce the potential for economic growth.

9.6.3 Minor negative impacts are likely for climate change and waste as all development will result in an increase in greenhouse gas emissions and waste, which could still have a negative impact after mitigation.

9.7 Mitigation

9.7.1 The Transport modelling assessed the future options for growth and whilst significant impacts were identified without mitigation, the assessment concluded that if mitigation measures are implemented at the appropriate stages, then Wealden District Council's Local Plan growth could be accommodated by the transport network. Achieving this outcome will require coordinated phasing of development continued investment in sustainable travel options, and regular monitoring to maintain network resilience.

9.7.2 The Scoping Water Cycle Study has also identified several water environment and water infrastructure factors that have the potential to constrain future growth across Wealden and Eastbourne. Of particular note, is a shortfall of houses accounted for in the current South East Water (SEW) Water Resource Management Plan (WRMP) for the Wealden area, which indicates water supply is a potential constraint to future residential growth in Wealden. There is also insufficient headroom at a significant number of Wastewater Treatment Works (WwTW) to accommodate all proposed growth without additional investment. Further work is recommended to refine the calculations provided in the Scoping WCS and identify opportunities to increase capacity for the proposed growth in partnership with Southern Water. Consideration should be given to the impact on water quality of the receiving water bodies as a result of the proposed additional housing, including the treatment constraints of the WwTWs and timescale implications for the phasing of development.

9.7.3 Development will need to be follow the guidance provided in the Landscape Character Assessment and Heritage Strategy on how to mitigate any potential impacts. The Local Plan policies will provide additional mitigation to many of the likely impacts in controlling how development proposals are implemented. Further details of potential mitigation measures to support the site allocations are provided in the individual site assessments, which will need to be refined as part of any detailed planning applications.

10 Spatial Option 2:

10.1 Option Overview

10.1.1 The key elements of **Option 2** include:

- All Sites selected for allocation at Regulation 18(2)
- Updated information to take into account sites withdrawn, with planning permission or new numbers of dwellings
- Reconsideration of sites which were considered uncertain or possible at the Regulation 18(2) stage
- Inclusion of the 16 Strategic Sites proposed for allocation in **Table 8.3** above
- No reduction in the quantum of housing development in areas where there may be a cumulative impact of development and/or impact upon the High Weald National Landscape.
- A total of **197,780 sqm** of employment space (102% employment need), including: Ashdown Business Park Extension (45,000 sqm) and North Polegate (63,000 sqm).
- A total of **16,753 homes** (72% of housing need), with no overall reduction in the site allocations in Frant; Horam and Uckfield / Maresfield to address concerns regarding potential coalescence and cumulative impacts.

10.2 Key Issues

10.2.1 **Option 2** proposes 16,833 homes (71.8% of the housing need) and 197,780 sqm of employment land. This option does not include a 25% reduction in the overall quantum of housing development in the parishes of Frant, Horam and Uckfield / Maresfield area.

10.2.2 The development proposed in Frant Parish amounts to 885 homes in total. The quantum of development has been reduced on several sites since the Regulation 18(2) consultation but provides 25% more growth than Option 1. The proposed development, although within the Parish of Frant is located within walking distance to Tunbridge Wells, a sustainable settlement, located outside the administrative boundary of Wealden. It is therefore expected that future residents are likely to make greater use of the facilities and services in Tunbridge Wells than Frant, a Tier 4 secondary village. Individual site numbers, however, have been reduced where appropriate to respond to the specific sensitivities of sites identified in the Landscape Character Assessment.

10.2.3 The quantum of development in Horam (885 homes) has not been reduced in this option. Concern was raised by some respondents that the amount of development proposed in a Tier 3 Primary Village was inappropriate. However, Horam is the only Primary Village, which is relatively unconstrained and does not have transport congestion issues, unlike the other primary villages. Providing development in Horam therefore enables a reduction in development pressure on other lower tier settlements, which are less suitable for large scale proposals, whilst providing for housing need and necessary supporting infrastructure.

10.2.4 A large quantum (2,434 net dwellings) of development is proposed around Uckfield, a Tier 1 settlement, and the most sustainable tier in the hierarchy. Significant opposition was raised at the Regulation 18(2) stage to the Owlsbury Site, which was proposed in the draft Focused Local Plan review for 1,500 homes. The proposals have been reviewed in view of representations and the new evidence for the Local Plan, as well as supporting information submitted as part of the live planning application. As a consequence, the allocation has been reduced in size from c.1500 homes to c.1300 homes. This reduction removes the most sensitive parts of the site from development in terms of landscape, ecology and heritage. Further reductions have also been made to other specific site numbers with the exclusion of some sites in their entirety, which it was considered could not be supported by the evidence available.

10.2.5 The option includes provision for 197,780 sqm of employment space or 102% of the estimated need. The overall quantum of employment provision has been reduced since the Regulation 18(2) stage as an over estimate of the amount of employment need was made, including provision for Eastbourne Borough Council, which is no longer required. The SA of sites also found that the majority of sites along the A22 are not suitable for development because of issues of access and pressure on the highway network so these sites have been excluded. Ashdown Business Park has therefore been included but with a reduced allocation of 45,000 sqm. A further reduction in the amount of employment allocations was not considered appropriate, in order to meet the need for employment space within the District.

10.2.6 Some new sites have also been considered, which were submitted after the Regulation 18(2) consultation. Other sites have been removed, which were either withdrawn, considered uncertain or which are no longer supported by the evidence.

SPATIAL OPTION 2

Small & Medium Sites + Significant Extensions to Existing Settlements

UPDATED SITES / NUMBERS SINCE REG 18(2)
+
RECONSIDERS DISMISSED SITES FROM REG 18(2)
+
UCKFIELD / FRAMFIELD / MARESFIELD / LITTLE HORSTED (2,434 HOMES)
+
FRANT (885 HOMES)
+
HORAM (750 HOMES)
+
ASHDOWN BUSINESS PARK EXTENSION (45,000 SQM)
+
NORTH OF POLEGATE (63,000 SQM)

TOTAL HOMES = 16,833 (71.8% need)
TOTAL EMPLOYMENT = 197,780 sqm (102% need)

10 SPATIAL STRATEGY : SPATIAL OPTION 2

10.3 Positive Impacts

10.3.1 Positive impacts are considered likely for:

- **HOUSING** - 16,833 homes or 71.8% of the District's housing need will be met, including provision for affordable housing and a mix of type and tenure.
- **ECONOMY AND EMPLOYMENT** - 197,780 sqm or 102% of the District's employment needs will be met, which will have a positive impact for the provision of employment and economic growth. The increase in the quantum of housing development is likely to have a positive impact upon the viability of proposals, particularly the strategic sites, which need to provide substantial infrastructure to deliver suitable development for all residents.
- **LANDSCAPE & TOWNSCAPE -** Development is directed to the areas of least sensitivity around the existing settlements, maintaining the existing character of the area as far as possible. The quantum of development has been reduced on specific sites to address concerns regarding cumulative impacts particularly in relation to potential coalescence and impacts upon the High Weald National Landscape and other sensitive areas.
- **INFRASTRUCTURE -** The increased quantum of development will mean that critical and essential improvements to infrastructure such as transport, education and community facilities are more likely to be provided.
- **TRANSPORT** - The quantum of development will provide opportunities to encourage modal shift through the provision of new infrastructure and services.
- **TOWNS & VILLAGES -** The increase in development is likely to have a positive impact upon the vitality and viability of existing villages and centres.
- **COMMUNITY** - Development is likely to result in an increase in the provision of new services and facilities and provide the necessary growth to support the provision of new infrastructure.
- **GREEN & BLUE INFRASTRUCTURE -** Improvements to green and blue infrastructure are likely as a result of new development, including the need to meet the requirement for Biodiversity Net Gain (BNG).
- **FLOOD RISK -** The majority of development is located in Flood Risk Zone 1. Where development includes areas of flood or surface water flood risk, suitable mitigation measures will need to be identified.

10.4 Uncertain Impacts

10.4.1 The delivery of sites has an element of uncertainty, in particular the quantum of development that comes forward within the Plan period. The further evidence prepared in relation to the Transport modelling, Landscape Character and Habitats Regulations Assessment (HRA) has been used to refine the quantum of development within the specific site allocations.

10.4.2 The Scoping Water Cycle Study (WCS) has indicated that water supply is a potential constraint for future growth and that there is insufficient headroom at a significant number of Wastewater Treatment Works. Further work is recommended to refine the calculations provided in the Scoping WCS and identify opportunities to increase capacity for the proposed growth in partnership with Southern Water.

10.4.3 Consideration will also need to be given to the capacity of Education and Health provision and the need for additional services as part of the detailed proposals.

10.5 Negative Impacts

10.5.1 Negative Impacts are considered likely for:

- **HOUSING** - Provision is 28% below the identified need for the District. The selected sites are largely to be delivered within the Plan period, leaving little provision for beyond the Plan period but does take into account potential sites for future growth. No provision is made for neighbouring authorities.
- **LANDSCAPE & TOWNSCAPE** - Development will still have an impact on the open countryside and rural character of the area, including the setting of the South Downs National Park and High Weald National Landscape but mitigation is considered achievable.
- **TRANSPORT** - The quantum of development is likely to put pressure on the transport network. The majority of development is situated within or adjacent to existing settlements, however, some of the major strategic sites included are not near a railway station and may encourage use of the private vehicle. The transport modelling indicated that without mitigation, the proposed Local Plan growth options could have severe impacts on the road network.
- **POLLUTION -** Development will result in an increase in light pollution in areas of 'darker skies'. Noise and air pollution will increase during construction in the short term but mitigation is considered possible
- **HISTORIC ENVIRONMENT** - The increase in development may lead to negative impacts upon designated heritage assets and their surroundings.
- **CLIMATE CHANGE -** All development will result in an increase in carbon emissions and as a consequence there will be a negative impact upon climate change.
- **WASTE & MATERIALS -** All development will result in an increase in waste & materials and as a consequence there will be a negative impact upon waste.

10 SPATIAL STRATEGY : SPATIAL OPTION 2

10.6 Cumulative Impacts

10.6.1 The cumulative impacts are largely positive as the Option sets out a defined framework for the delivery of sustainable and high-quality development. Although the strategy meets the identified need for employment, which will have a positive impact, it fails to meet the identified housing need of the District (28% below). The reduction in development is likely to have a combined negative impact on the current housing crisis, particularly affordable housing provision. However the level of reduction in growth is not thought to have a negative impact upon the delivery of jobs and infrastructure provision overall.

10.6.2 The strategy has reduced the level of growth to respond to new evidence and consultation responses in an effort to balance the likely impact upon the natural environment, protected landscapes and the countryside alongside necessary growth for the District. The proposed quantum of development will have a positive impact for landscape and the character of the area, whilst ensuring that the viability of development proposals is not compromised.

10.6.3 The provision of suitable community facilities and services and supporting infrastructure is therefore likely to be achieved. The level of growth is expected to have a positive impact in relation to infrastructure and the viability of proposals, enabling the provision of the necessary facilities, services and utilities to support growth and prosperity within the District.

10.6.4 Minor negative impacts are likely for climate change and waste as all development will result in an increase in greenhouse gas emissions and waste, which could still have a negative impact after mitigation.

10.7 Mitigation

10.7.1 Whilst a higher quantum of development will potentially have an increase in the cumulative impacts upon the landscape and coalescence with the surrounding settlements, the supporting evidence and site assessments have shown that the likely impacts can be suitably mitigated. Individual site numbers, however, have been reduced where appropriate to respond to the specific sensitivities of sites.

10.7.2 The Transport modelling assessed the future options for growth and whilst significant impacts were identified without mitigation, the assessment concluded that if mitigation measures are implemented at the appropriate stages, then Wealden District Council's Local Plan growth could be accommodated by the transport network. Achieving this outcome will require coordinated phasing of development continued investment in sustainable travel options, and regular monitoring to maintain network resilience.

10.7.3 The Scoping Water Cycle Study has also identified several water environment and water infrastructure factors that have the potential to constrain future growth across Wealden and Eastbourne. Of particular note, is a shortfall of houses accounted for in the current South East Water (SEW) Water Resource Management Plan (WRMP) for the Wealden area, which indicates water supply is a potential constraint to future residential growth in Wealden. There is also insufficient headroom at a significant number of Wastewater Treatment Works (WwTW) to accommodate all proposed growth without additional investment. Further work is recommended to refine the calculations provided in the Scoping WCS and identify opportunities to increase capacity for the proposed growth in partnership with Southern Water. Consideration should be given to the impact on water quality of the receiving water bodies as a result of the proposed additional housing, including the treatment constraints of the WwTWs and timescale implications for the phasing of development.

10.7.4 Development will need to be follow the guidance provided in the Landscape Character Assessment and Heritage Strategy on how to mitigate any potential impacts. The Local Plan policies will also provide additional mitigation to many of the likely impacts in controlling how development proposals are implemented. Further details of potential mitigation measures to support the site allocations are provided in the individual site assessments, which will need to be refined as part of any detailed planning applications.

11 The Preferred Option

11.1 Overview of the Spatial Strategy

11.1.1 The Council has selected Option 2 as the preferred option for the Spatial Strategy. The strategy identifies that development should be focused in the small and medium sites of the District with significant extensions to existing settlements. Development has been focused to the higher tier settlements as set out in the Sustainable Settlement Strategy

11.1.2 The Spatial Strategy directs growth to the District's most sustainable settlements and to locations adjoining neighbouring towns, including Eastbourne and Royal Tunbridge Wells, where strong functional relationships exist. Employment growth will be focused along the A22, A27 and A26 corridors. The strategy also seeks to minimise development within the High Weald National Landscape, directing growth to the most sustainable locations whilst conserving its nationally important landscape character.

11.1.3 The strategy aims to provide for the present and future needs of the District, whilst protecting the highly valued landscape and townscape character and responding to the impacts of climate change. Owing to the significant environmental constraints of the District, the strategy fails to accommodate the housing need for the District in full.

11.1.4 The strategy provides for 71.8% of the District's identified housing needs and 102% of the identified employment need. The District has no spare capacity to offer to neighbouring authorities, the majority of which are unable to meet their own needs due to the specific constraints of their authority areas.

11.1.5 The Council has taken a 'no stone unturned' approach to the identification and assessment of potential sites for development and considers that the proposed strategy provides an appropriate balance between enabling necessary growth, whilst protecting its sensitive assets.

11.2 Selection/Rejection of Options

11.2.1 Under the SEA Regulations, there is a requirement to consider 'reasonable alternatives' when undertaking the assessment and to set out an outline of the options considered and the reasons for their selection or rejection. Options have been considered in the development of the draft Local Plan for the Spatial Strategy; the Local Plan Policies; and Site Allocations.

11.2.2 The option of 'do nothing' or 'no new plan' was not considered a 'reasonable alternative' as it would not address the need to plan for the required housing and economic growth in the District or address recent changes in planning and environmental legislation and guidance. A summary of the Options considered in the development of the Plan are set in Sections 6 -10 of this report.

11.2.3 Further refinements to the Options and Policies have been made as part of Regulation 19 Local plan and SA. The Preferred Spatial Strategy is based on previous Options considered in the development of the Plan, namely **Option F**, Regulation 18(1) and **Option 3**, Regulation 18(2).

11.2.4 Following the Regulation 18(2) Consultation on the 'Focused' Review of the Local Plan and supporting SA, the options for the Spatial Strategy were reconsidered in view of the consultation responses, new evidence and the SA of sites. Several Strategic Sites considered previously were rejected as a result of the revised SA, particularly in view of likely impacts upon landscape, townscape, heritage, transport and the perception of coalescence.

11.2.5 The following sites have therefore been removed as options for the Spatial Strategy, which has significantly reduced the potential to meet the identified housing need within the District:

- Land to north-west of Hempstead Lane, Hailsham (Ref. 825/1310)
- Hesmonds Stud, East Hoathly (Ref. 996/1950)
- Land at Laughton Park Farm (Ref. 1235/1950)
- Land at High Cross Farm, Framfield (Ref. 400/1410)
- Polegate West, Polegate (Ref. 1069/1510 and 204/1510)
- Hempstead Farm (Ref. 1232/1410)

11.2.6 The Regulation 19 stage has therefore considered two further options, which are refinements of the previous options as set out in **Sections 9 and 10** of this report. It should be noted that both options fail to meet the housing need for the District or provide for the needs of neighbouring authorities. The majority of the authorities in the Housing Market Areas for Wealden are currently unable to meet their housing need. Wealden's substantial constraints make the balance between protection of the environment and the provision for future needs particularly difficult to achieve.

Option 1 - Small and medium sites of the District with significant extensions to existing settlements (67.4% Housing Need, 102% employment need)

11.2.7 **Option 1** provides housing provision which is 32.6% below the District's Housing need, a significant shortfall at a time when there is a housing crisis, which will also have a negative impact upon the affordable housing provision. The District's employment need will be met which will have a positive impact for employment and economic growth. The option is likely to reduce the cumulative impact of development to some extent, particularly the environmental impacts but will also result in less beneficial social and economic impacts, as a result of more constrained development. The reduction in development is likely to have a significantly negative impact upon the viability of proposals and the delivery of substantial infrastructure, which will have negative impacts for residents and the prosperity of the District.

It is therefore recommended that Option 1 is not taken forward as the proposed Spatial Strategy.

Option 2 - Small and medium sites of the District with significant extensions to existing settlements (71.8% Housing Need, 102% employment need)

11.2.8 **Option 2** provides 16,753 homes (71.8%) of the District's housing need, which is still substantially below (28.2%) the District's identified housing need. The strategy has reduced the level of housing development to respond to new evidence and consultation responses in an effort to balance the likely impact upon the natural environment, protected landscapes and the countryside, alongside necessary growth for the District. The proposed quantum of development will enable a positive impact for landscape and the character of the area, whilst ensuring that the viability of development proposals is not compromised. The District's employment need will be met in full, which will have a positive impact for employment and economic growth.

11.2.9 The option is likely to have greater environmental impacts overall, particularly with regard to the loss of greenfield land but will also have more beneficial social and economic impacts, as a result of less constrained development. The evidence has established that suitable mitigation measures are possible to minimise any likely negative impacts.

It is therefore recommended that Option 2 is taken forward as the proposed Spatial Strategy.

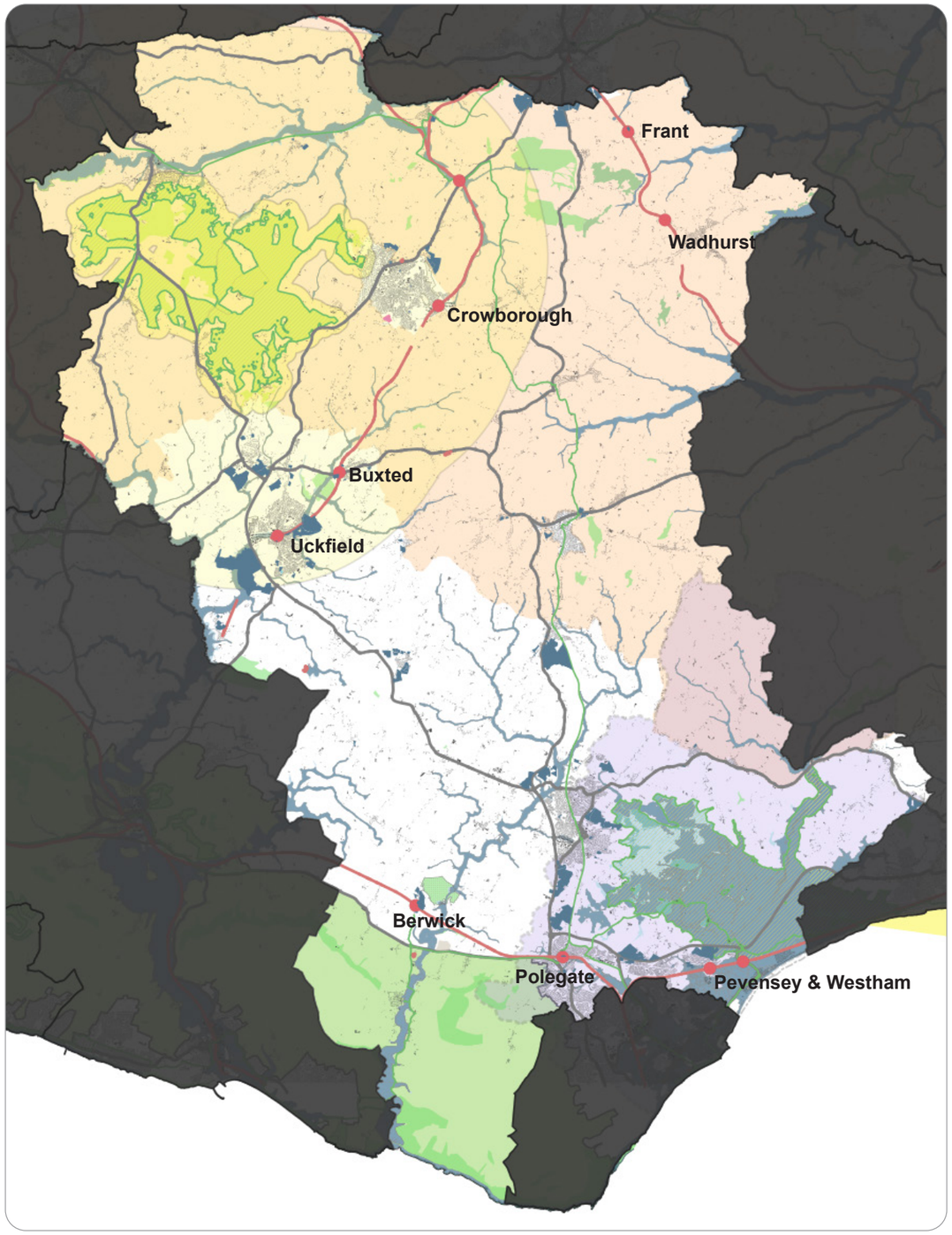
11 PREFERRED SPATIAL OPTION

PROPOSED SPATIAL STRATEGY

Small & Medium Sites + Significant Extensions to Existing Settlements

ALL SITES IN REG 18(1)
+
UPDATED SITES / NUMBERS SINCE REG 18(2)
+
RECONSIDERS DISMISSED SITES FROM REG 18(2)
+
UCKFIELD / FRAMFIELD / MARESFIELD / LITTLE HORSTED (2,434 HOMES)
+
FRANT (885 HOMES)
+
HORAM (750 HOMES)
+
ASHDOWN BUSINESS PARK EXTENSION (45,000 SQM)
+
NORTH OF POLEGATE (63,000 SQM)

TOTAL HOMES = 16,753 (71.8% need)
TOTAL EMPLOYMENT = 197,780 sqm (102% need)



KEY

- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- SPA + 400m buffer
- SPA + 7km buffer
- Site of Special Scientific Interest (SSSI)
- High Weald National Landscape (HWNL)
- Flood Zone 3
- Flood Zone 2
- Pevensey Levels Hydrological Area
- South Downs National Park (SDNP)
- Railway Station
- Railway line
- Roads
- National Cycle Route

11.1 Proposed Spatial Strategy

12 POLICY ASSESSMENTS

12 Planning Polices

12.1 Development of the Plan Policies

12.1.1 The new Draft Local Plan will contain a number of policies that will implement the Preferred Option and help achieve the Plan's objectives. A list of the policies is set out in **Appendix 4** of this report.

12.1.2 Under the SEA Regulations, there is a requirement to consider reasonable alternatives when undertaking the assessment and to set out an outline of the options considered and the reasons for their selection or rejection. Options have been considered in the development of the draft Local Plan for the Spatial Strategy; the Local Plan Policies; and Site Allocations. The **Initial SA Report 2024 - Appendix 8**, sets out 'reasonable alternatives' considered in the development of the Plan's policies.

12.1.3 The option of 'do nothing' or 'no new plan' was not considered a 'reasonable alternative' as it would not address the need to plan for the required housing and economic growth in the District or address recent changes in planning and environmental legislation and guidance.

12.2 Assessment of Plan Policies

12.2.1 The Initial SA 2024 considered 'reasonable alternatives' (options) for each of the policy areas within the Draft Local Plan and set out the reasons for selecting or rejecting the approaches. An appraisal of the draft policies was undertaken including the reasons why the policies were selected. The full assessment of the policies is contained within the **Initial SA Report 2024** - **Appendix A9.**

12.2.2 Since the Initial SA report, the following policies were amended as part of the SA Regulation 18(2) February 2026:

Policy CC8: Sustainable Drainage / Pevensey Levels

Policy HO8: Affordable Housing

Policy HO9: Gypsy, Traveller Travelling Showpeople Site Criteria

12.2.3 In addition, a new **Policy CC9 Coastal Change Management Area** was included in the consultation. The Council has considered its evidence base on coastal change management, along with the interpretation of national policy and guidance. WDC considers that the Shoreline Management Plan provides strong enough assurances that the hold the line approach will be maintained for a substantial amount of the plan period to 2042, and that this will continue beyond to protect residents, businesses and infrastructure into the future. As such the CCMA policy has now been removed as it is not required.

12.2.4 An assessment of the draft policies including any further amendments has been carried out as part of the Regulation 19 Local Plan including revisions to the Spatial Strategy and Housing policies. The results show that the majority of the policies are likely to have a positive impact against the sustainability objectives. The results can be found in the **Regulation 19 SA - Part 4, September 2026**.

13 Cumulative Impacts

13.1 Cumulative Impacts of the Plan

13.1.1 The SEA Directive requires that cumulative and synergistic effects are considered when identifying likely significant effects. These effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the Plan (e.g. light pollution, landscape and visual impacts) have a combined effect.

13.1.2 The **Initial SA Report, 2024** considered how the different policy areas and proposed site allocations of the Plan would affect the environmental, social and economic elements identified in the sustainability objectives, including the likely cumulative effects. It is also important to consider the effects of the plan implementation in itself and when combined with other plans i.e. neighbouring authorities.

13.1.3 An initial assessment of the cumulative impacts was carried out in support of the Draft Plan and was included in the **Initial SA Report, 2024 - Appendix 13**. The assessment showed that the majority of the draft Plan Policies performed well against the Sustainability Objectives.

13.1.4 The majority of the Draft Plan policies have not changed significantly since the Regulation 18(1) assessment and therefore the cumulative impacts have also not changed. The cumulative impacts of the Plan policies have been reviewed and updated as part of the **Regulation 19** stage.

13.1.5 Where the Initial SA report did show a high degree of uncertainty as well as minor negative impacts was with regard to the options for growth. The focus of this SA has therefore concentrated on these areas of uncertainty in the Plan.

13.1.6 The cumulative impacts of the policies are included within the **SA Part 4 - Policy Assessments.** A summary of the key impacts identified is provided opposite. The implementation of development will be in line with the policies and mitigation measures identified within the Wealden Local Plan, which will be monitored as part of the Plan implementation.

13.1.7 The consideration of cumulative impacts included in the assessment of the proposed Site Allocations in January 2026 **(SA Part 2 - Parish Site Assessments and Part 3 - Strategic Site Assessments),** was limited where there was a lack of detail for proposals or evidence was still not available. The cumulative impacts have therefore been reviewed and updated where appropriate and are set out in the **SA Part 2 - Parish Site Assessments and Part 3 - Strategic Site Assessments.**

Policy Area	Cumulative Impacts
Spatial Strategy	The cumulative impact is positive as the Spatial Strategy sets out a defined framework for the delivery of sustainable and high-quality development, which meets the needs of the District's communities for homes and jobs, whilst balancing the impact of growth on the natural environment, protected landscapes and the countryside. The Strategy provides for the comprehensive delivery of new development and homes. Minor negative impacts are likely for climate change mitigation and waste as all development will result in an increase in greenhouse gas emissions and waste, which could still have a negative impact after mitigation. The level of growth is expected to have a positive impact in relation to infrastructure and the viability of proposals, enabling the provision of the necessary facilities, services and utilities to support growth and prosperity within the District.
Climate Change	Impacts are likely to be positive as the policies will ensure that new developments in Wealden are as energy efficient as possible, follow the energy hierarchy and are 'net zero carbon ready', ensuring that development contributes positively to the mitigation of and adaptation to climate change across the District, and the reduction of carbon emissions. The policies will improve the energy efficiency of existing buildings including refurbishments and ensure the highest standards of sustainable design and construction in Wealden, improving the overall environmental performance of new developments and minimising their contribution to climate change effects over their lifetime. Development will need to protect existing carbon sinks and take opportunities to provide nature-based solutions that can assist adaptation and mitigation through carbon offsetting, carbon storage/sequestration and adaptation to climate change risks. Proposals for renewable and low carbon energy-generating and distribution networks, including heat networks are supported but will need to consider potential negative cumulative impacts on issues such as ecology, landscape, visual impact and heritage assets and provide appropriate mitigation, as identified in the relevant policies. Developments are to be as efficient in their water usage as possible, whilst reducing vulnerability to the adverse effects of climate change and the projected increases in population, including drought and impacts on the District's water resources. Development should be directed to areas at the lowest risk of flooding, whilst ensuring flood risk is not increased elsewhere, including increasing flood risk downstream as a result of cumulative development
Design	Impacts are likely to be positive as the policies will ensure that all development contributes positively to the high quality design of spaces and places, the natural environment and economic vitality in the District through early, proactive and effective engagement with the community on design issues, where appropriate. The policies will ensure larger developments use design guides, codes and masterplans to provide a more detailed framework for creating high quality, sustainable and locally distinctive places, which will deliver high quality environments in which residents can live and work and provide benefits for communities. The cumulative impact of advertisements and associated illumination on townscape, landscape, visual amenity and heritage significance will be taken into account when determining applications.
Economy & Employment	Impacts are likely to be positive as the policies aim to attract and promote inward investment, facilitate higher value employment development, help to support the existing and future workforce with their skills and education, enable effective partnership working to secure key supporting infrastructure, maintain the District's town centres and visitor offer, support the growth of the District's rural economy, and support existing businesses to become Net Zero.
Historic Environment	Impacts are likely to be positive as the policies will ensure development proposals affecting the historic environment are managed positively and continuously for the multiple benefit of the existing population and visitors, whilst protecting and conserving the historic environment for future generations to enjoy. The cumulative impact of incremental small-scale change on the significance of heritage assets can have as great an effect as a larger scale change and will need to be considered early in the design process.
Housing	The cumulative effect is likely to be largely positive in delivering an appropriate mix and type of development in the District, meeting the identified need as far as possible, whilst ensuring the necessary safeguards are in place to address the established character and density of the area, viability, site specific constraints and local housing needs. The policies support the development of brownfield land in sustainable locations in order to reduce the requirement for the development of greenfield land. Whilst there is likely to be a combined positive impact of increasing density across the District by increasing the potential for sustainable travel and access to services and reducing the requirement for the development of greenfield land, the impact upon infrastructure is uncertain and will need to be carefully considered in the decision making process. The uncertain and negative impacts are likely to be offset by the proposed mitigation measures and benefits of providing for the housing needs of the District.
Infrastructure	Impacts are likely to be positive as the policies will ensure new development supports and contributes toward infrastructure facilities, whilst ensuring that the infrastructure is delivered and is operational prior to, or alongside the development it is required to serve. The policies will enable the delivery of safe, accessible, inclusive, and sustainable transport options for both existing and new development across the District by ensuring that opportunities for improved access to pedestrian and transport infrastructure are implemented alongside necessary highways mitigation, active travel provision and improved public transport.
Natural Environment	The cumulative effect is likely to be positive in conserving, restoring and enhancing the District's biodiversity resource and landscape and townscape character, which contribute to nature recovery and biodiversity improvements, whilst ensuring that the mitigation hierarchy is followed and that developments meaningfully contribute to nature recovery within the District and, where possible the wider area, working with neighbouring authorities to ensure a coherent and connected natural environment. The policies will prevent adverse effects from development on the integrity of the Ashdown Forest SPA and SAC and setting of the High Weald National Landscape and South Downs National Park, as well as the wider environment. Any new development which is likely to have a significant effect, either alone or in combination with other plans or projects, will need to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.
Town Centres	Impacts are likely to be positive as the policies will ensure that proposals for main town centre uses within district, service and local centres, as defined on the Policies Map, are of an appropriate scale to the centre, whilst reflecting their function and position within the defined town centre hierarchy and respecting both the natural and built environment.

14 Mitigation Measures

14.1 Approach to Mitigation

14.1.1 The SA regulations require that the SA process should consider ways of mitigating adverse effects and maximising beneficial effects and propose measures to monitor the significant effects of implementing the Plan.

14.1.2 Mitigation measures have been considered throughout the assessment process and will continue to be reviewed and updated, as appropriate. The Local Plan policies will need to be taken into consideration in the determination of all planning applications, many of which identify specific measures for mitigation.

14.1.3 Details of the specific mitigation measures, which could be applied are set out in the assessments of the policies and sites, where available.

14.2 Summary of Mitigation Measures

14.2.1 Specific mitigation measures are set out in the detailed **SA Assessments in Parts 2, 3 and 4 of the SA Repor**t. Key mitigation measures for each policy area are set out below:

Climate Change

- ▷ Development will be expected to meet building performance standards using the energy hierarchy in the design, construction, and operational phases and utilise landform, layout, building orientation, massing and landscaping to minimise energy consumption and maximise energy efficiency measures.
- ▷ Residential development should seek to achieve a 4 Star rating under the Home Quality Mark scheme and non-residential development a BREEAM minimum 'Excellent' rating, and where possible an 'Outstanding' rating. Active House and Passivhaus accreditation schemes can also be utilised to achieve and demonstrate a developments or building's sustainable design and construction credentials.
- ▷ Proposals for the refurbishment of 10 dwellings or more are expected to meet BREEAM Domestic Refurbishment Excellent. Applicants are encouraged to use the six principles of best practice within LETI's Climate Emergency Retrofit guidance.
- ▷ Energy Performance Certificates (EPC) will be required for properties when constructed, sold or let and all private rented properties should achieve an EPC of E or better in accordance with regulations.
- ▷ Development should take a 'life cycle' approach, which encompasses location, design, materials, construction management and the life and long-term stewardship of developments, including demolition of existing buildings.
- ▷ A Sustainability Statement must be submitted with the planning application to demonstrate that the development proposals will comply with the Plan policies.
- ▷ Proposals containing an identified carbon store must consider the potential impacts of the development on the carbon store and seek to maximise opportunities to enhance its sequestration function and submit an appropriate management plan. Applicants are encouraged to refer to Natural England's 'Carbon Storage and Sequestration by Habitat 2021 (NERR094) at the earliest stages in the planning process.
- ▷ Development proposals for renewable and low-carbon energy generation, including associated infrastructure, must avoid significant adverse impacts on the local landscape character including: the High Weald National Landscape; the setting of the South Downs National Park; biodiversity; residential amenity of existing and future occupiers of nearby property, including noise, shadow flicker, vibration and visual impacts; agricultural land use and activity; and heritage assets.
- ▷ Development proposals, including the retrofit / refurbishment of existing buildings must demonstrate that water reuse, recycling and rainwater harvesting measures have been incorporated wherever possible to reduce demand on mains water supply as part of an integrated approach to water management.
- ▷ Proposals must apply a sequential flood risk-based approach to the location of development and the exception test where the application of sequential test is not possible. Flood mitigation must be implemented in accordance with the Council's SFRA, the NPPF and PPG. Developers must ensure that mitigation does not increase flood risk elsewhere and that floodplain compensation is provided where necessary.
- ▷ SuDS should be integrated as a fundamental part of site design and sufficient space should be provided within the site layout. The systems should be multi-functional to ensure flood risk reduction; water quality improvement; biodiversity enhancement; and green/ blue infrastructure. For phased developments, a strategic drainage approach should be provided across all phases.
- ▷ Development proposals must incorporate Sustainable Drainage Systems (SuDS) designed and implemented in accordance with the latest local, regional and national guidance and, where relevant, demonstrate that surface water management will not adversely affect the integrity of the Pevensey Levels SAC and Ramsar site where the development proposal falls within the Pevensey Levels Hydrological Catchment (PLHC).

14 MITIGATION MEASURES

Design

- Development will be expected to be designed to last, including a consideration of management and maintenance of both private and public spaces.
- Applicants will be expected to demonstrate how a high quality design has been achieved and how national and local design guidance has been considered.
- Applications will be expected to demonstrate early, proactive and effective engagement with the community on design issues, as required by the NPPF and where appropriate, in accordance with the Council's own adopted Statement of Community Involvement to demonstrate that the views of the local community have been sought and taken into account in the formulation of development proposals.
- The Council will expect applicants to use design requirements as set out in the Local Plan and the national and local design guidance. Design & Access Statements are required to accompany certain applications for planning permission and applications for listed building consent.

Economy & Employment

- The Council will consider the use of either planning obligations or planning conditions to secure additional infrastructure to support proposals or to ensure necessary protection of the environment.
- Where relevant, the Council will also use planning obligations to secure support for local employment, skills and education.
- The loss of employment uses (i.e. E(g), B2 and B8) within strategic employment sites will need to be justified. Proposals for 'main town centre use', including offices, will need be safeguarded and need to comply with Policy TC2 Sequential and Local Impact Test.
- The loss of tourism facilities and attractions to alternative uses will not be supported unless it is demonstrated that the business is no longer viable and has no reasonable prospect of continuing.

Historic Environment

- Any potential impacts on the historic environment need to be considered early in the design process to ensure that they can be minimised or avoided.
- Any archaeological research and investigation that is necessary needs to be carried out at an early stage in the design process, including any investigative work on above ground archaeology such as buildings.
- Any development affecting a heritage asset (both designated and non-designated) and/or its setting must demonstrate sufficient understanding of its significance through the provision of a Heritage Statement in accordance with current Historic England good practice guidance.
- Applicants will have to demonstrate that they have investigated all alternative ways of securing the asset, including sources of public and private investment before submitting a proposal for an enabling development. Benefits will be secured using a S106 agreement
- Proposals in relation to energy efficiency and carbon resilience must demonstrate that less harmful alternatives have been considered and adopt a whole building approach.
- The change of use of heritage assets will be supported where there is clear justification & evidence to support the change and potential impacts on the fabric and significance of the building. The loss of heritage assets will need to accord with national policy and provide justification for such a loss.

Housing

- For both market and affordable homes, the housing mix of new developments should have regard to the Council's latest evidence base and will be considered against the criteria set out in the policies.
- New housing developments must make the most effective use of land and seek to optimise the use of land and the potential of a site. Density will be expected to be higher where accessibility to transport and services is higher. Reduced densities will only be supported where exceptional site-specific constraints can be demonstrated and where it can be clearly shown that the proposed development would continue to make effective and efficient use of land.
- Affordable housing should be designed to be visually indistinguishable and integrated throughout the development. Where robust viability evidence demonstrates that policy-compliant provision would make the development unviable, the maximum reasonable amount of affordable housing will be sought, giving priority to adjusting tenure mix before reducing the overall provision.
- A design code, prepared by the developer and agreed with the District Council, will need to be followed for each self-build/ custom house build plot and individual plot passports will also be required.
- GTTSP sites will be determined against the policy criteria, including: need; relationship to sustainability settlement and services; scale; flood risk; vehicular and pedestrian access; water and waste facilities; and design. Authorised permanent GTTSP sites will be safeguarded for their existing use, proposals resulting in the loss, redevelopment or change of use must be supported by robust evidence.
- The loss of existing older persons' accommodation and specialist housing will not be supported unless it is demonstrated to the Council's satisfaction that the criteria set out in the policy have been met.
- All new dwellings will be required to meet the appropriate accessibility standards and Nationally Described Space Standards.

Infrastructure

- Early engagement with infrastructure providers is expected. 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.
- Where development is phased, infrastructure delivery must be aligned with the agreed phasing of development. 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.
- 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. Facilities should be located in areas well served by existing or new/enhanced public transport services and walking, wheeling and cycling routes and ensure accessibility for all users.
- Strategic transport impacts have been assessed through the East Sussex Countywide Transport Model and the Wealden Local Plan Shared Transport Evidence Base, which identify impacts and proportionate mitigation measures to support the Local Plan strategy in alignment with the objectives of East Sussex LTP4 and the Transport Strategy for the South East (2025)
- A Transport Assessment, Transport Statement and Sustainable Travel Plan will need to be provided, relevant to the scale and nature of the development, in line with East Sussex County Council guidance and Active Travel England's design assistance tools.
- Telecommunications infrastructure proposals must demonstrate that the proposed location is necessary, having regard to opportunities for mast sharing and the use of existing buildings and structures.
- Land is safeguarded for the delivery of an extension to the Arlington Reservoir and the restatement of Lewes to Uckfield, Eridge to Tunbridge Wells and Willingdon Chord railway lines as defined on the Policies Map. Development will also not be permitted where it would prejudice the delivery of any offline improvements to the A27 between Lewes and Polegate.

14 MITIGATION MEASURES

- New open space, sports and recreation provision must be safe, inclusive, accessible, well-connected, appropriately lit, multifunctional and designed to support health, nature recovery, climate resilience and long-term maintenance.

Natural Environment

- The policies identify the need to follow the mitigation hierarchy of avoidance, mitigation and compensation. Where compensatory measures are required, these should be provided on-site, however where it is not possible, offsite compensation will be required.
- Avoidance and Mitigation measures are necessary to ensure that the conservation objectives for Ashdown Forest SPA and SAC are met. Avoidance and mitigation for recreational development is required for a 400m to 7km zone around Ashdown Forest SPA as confirmed by the visitor surveys in 2008, 2016 and 2021 undertaken by the Council in partnership with other Local Authorities. Planning permission will be refused where significant harm to biodiversity cannot be avoided. Residential development will not be permitted on sites where the curtilage of a property falls within 400m of the SPA.
- Proposals for a net increase in residential development between 400m and 7km from Ashdown Forest SPA will be required to contribute to mitigation through the provision of Suitable Alternative Natural Greenspace (SANG) to the minimum level of 8ha per 1,000 net increase in population or the provision of a financial contribution to a strategic SANG and a financial contribution to the Ashdown Forest Strategic Access Management and Monitoring (SAMM) Strategy. SANG will be supported where they meet Natural England SANGs Guidelines.
- Residential development located adjacent or close to the SPA 7km zone boundary will be assessed on a case-by-case basis and may require mitigation for the SPA. A site specific HRA will be required at the application stage for sites on or close to the boundary. New development likely to result in increased traffic will need to be assessed through a site-specific Habitats Regulations Assessment to consider any air quality impacts and to prevent adverse effects on the integrity of the Ashdown Forest SAC.
- Planning applications should be supported by relevant environmental information, including protected species and habitat records from the Sussex Biodiversity Record Centre, which is informed by appropriate and up-to-date ecological data/surveys and air quality assessments
- When granting permission for any proposals that include BNG, the Council will impose conditions or seek planning obligations or Conservation Covenants that secure appropriate management and monitoring regimes to deliver BNG for at least 30 years after the completion of works.
- Any ecological surveys should be undertaken by suitably qualified professionals and in line with best practice / guidance and Government standing advice. Scheme design should be informed by an Ecological Constraints and Opportunities Map.
- Where the impact on the HWNL is considered to be significant, a full Landscape and Visual Impact Assessment (LVIA) will be required. All proposals for development in, or adjacent to, the National Landscape should be accompanied by a LVIA and assessment of all relevant National Landscape Management Plan objectives. Development within the National Landscape is expected to be limited in scale and extent and in accordance with the NPPF and HWNL Management Plan.
- Development which contributes to the setting of the SDNP should conserve and enhance the landscape and scenic beauty of the National Park in line with SDNP Local Plan and Management Plan.
- Trees lost through development, will be replaced by an appropriate number of suitable trees on-site, in terms of species and size, which replaces or exceeds the loss.
- In the absence of site surveys and detailed assessments, a minimum buffer of 25m will be assumed from the edge of the woodland, to allow for the presence of veteran trees and the fall height of mature trees.
- Development which results in the loss of BMV agricultural land will need to be justified and assess the impact on the wider farming resource, natural capital, and ecosystem services.
- Proposals must demonstrate that there is adequate existing water supply infrastructure (foul and surface drainage as well as drinking water provision) to serve the development over its lifetime.
- Development affecting the water environment will only be permitted where it can be demonstrated that any risks to groundwater, surface water bodies, wetlands, designated sites and other sensitive aquatic environments have been avoided or appropriately mitigated.
- Where contaminated land is identified, an Options Appraisal and Remediation Strategy must be submitted and agreed to demonstrate that the land is to be made safe for its intended purpose.
- Regard to the objectives identified for the East Sussex Local Nature Recovery Strategy 2026 (LNRS) should be made, and a contribution towards those objectives sought wherever possible

Town Centres

- Development proposals for main town centre uses will be expected to take a ‘town centre first’ approach and be located within district, service and local centres, as defined on the Policies Map, unless the proposal complies with the sequential test
- Temporary ‘meanwhile’ uses to occupy vacant units are to be permitted where they support the vitality and viability of designated centres and do not compromise the future redevelopment of the unit/ site.
- Proposals for retail development over 350 square metres and leisure development over 2500 square metres must undertake an impact assessment to demonstrate that they will not have a significant adverse impact on the District’s defined centres, either on their own or cumulatively in consideration of other commitments in the area.
- Uses that are likely to detract from the overall shopping function and have closed or inactive frontages will be resisted in the Primary Shopping Area, as this will detract from the overall shopping function.
- The change of use of existing ground floor premises, that is defined as a ‘main town centre use’ to residential, will not be supported within a defined centre.
- Where necessary, planning conditions and/or legal agreements should be applied to any new planning permission outside of defined centres, including defining the nature and extent of the proposed use to ensure no future adverse impacts on existing defined centres.
- All extensions to existing garden centres that are proposed to have retail floorspace above 350 square metres gross will be subject to the Local Impact Test.

15 Monitoring & Uncertainties

15.1 Monitoring

15.1.1 The Council currently produces an Authority Monitoring Report (AMR) annually, which is the main mechanism for assessing the performance of the adopted planning policies. The AMR sets out how the Council's planning policies have been implemented and whether the planning policies are addressing the required issues.

15.1.2 The indicators set out in the Sustainability Appraisal Framework will be incorporated into the AMR to enable the specific impacts, which relate to the delivery of sustainable development to be assessed in the future. If the AMR identifies any changes that should be made to the policies, such changes will be reviewed and a further SA undertaken if it is considered necessary.

15.2 Uncertainties & Risks

15.2.1 SA is a Strategic Environmental Assessment tool for predicting the 'likely significant effects' of the Plan. The assessment is a high level, objective process and the prediction of effects relies upon an evidence based approach, which incorporates expert judgment. When predicting effects, it is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and / or the success of mitigation measures over a long timeframe.

15.2.2 The assessments that have been undertaken in this report are based on the best publicly available information and every attempt has been made to predict effects using this information as accurately as possible. The 'reasonable alternatives' have been assessed using the same method. Where detailed or up-to-date data is unavailable, then reasonable assumptions have been made to inform the assessments.

15.2.3 At the Regulation 18 Stage, uncertain impacts were identified in relation to several of the Sustainability Objectives as a result of evidence which still needed to be prepared, as well as information regarding the proposed development for site allocations. The Regulation 19 Stage SA of the Local Plan has sought to address any remaining uncertainty identified at the previous stages.

15.2.4 Specific attention has been given to the uncertain impacts identified when reviewing proposals. Mitigation measures have been provided in more detail as evidence has been finalised. Further information will also need to be provided at the planning application stage, where effects are considered in more detail, to ensure that any potential adverse impacts are suitably addressed.

15.2.5 There are also risks largely outside the Council's control, which could have an impact on development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues has been included, as far as possible, within the monitoring and implementation plan.

16 NEXT STEPS

16 Next Steps

16.1 Next Steps

16.1.1 The Council will consider all the consultation responses (representations) received during the consultation period for the **Regulation 19 SA** of the Proposed Submission Local Plan and make any necessary amendments.

16.1.2 Following the consultation, the Proposed Submission Local Plan and SA will be submitted for Examination in Public (EiP) in December 2026. If any major modifications are identified as a result of the consultation or EiP, the Council may need to carry out a further SA of the modifications which will be issued for consultation.

Jam Consult Ltd
23 Harelaw Avenue
Glasgow
G44 3HZ

jane@jamconsult.com
07812 129 810

www.jamconsult.com