

Wealden District Council (WDC) Response to the Hailsham Design Guidelines - Regulation 16 Consultation

Overall Observations

The Hailsham Design Guidelines (HDG) document is to be commended for focussing on those areas where design guidance has been identified during the consultation as being required, such as town centres, new residential development, smaller sites and retrofitting of existing streets. It does not seek to reproduce good practice design principles set out elsewhere, which is supported. The signposting to other documents in the green boxes works well and avoids duplication with external guidance and documents. It should also be commended for its principles for a safe, pedestrian friendly, inclusive environment and its guidance on creating safer gender and age inclusive places.

Our comments at the Regulation 14 Stage regarding the format of the document (it was previously titled Hailsham Design Guide and Code despite not all the stages of coding having been carried out) have been considered by Hailsham Town Council (HTC) and relevant adjustments have been made. We confirm that the document works better as Design Guidelines.

Duplication

As stated in our comments on the main Neighbourhood Plan, there is some duplication between the main Plan document and this Design Guide. There is no need for the Neighbourhood Plan to repeat criteria in the Design Guide and vice versa, and a reference to the relevant part of the Design Guide could be made instead in the policies. For example, there is guidance on creating well integrated developments, amenity green space, natural green space and allotments and then separate policies in the Neighbourhood Plan on well-integrated residential development, diversifying and improving existing amenity green space, green and blue infrastructure and allotments.

Foreword

In the foreword it states, 'subject to any future reorganisation of Council structures, parts of the document, such as those in respect of well integrated residential development, variety and interest, may be relevant to future growth in Hellingly too'. The HDG must only be based on the Hailsham Town Council designated neighbourhood area. Hellingly Parish Council are undertaking a review of its own NP and already have a Neighbourhood Plan in place. It is recommended that this paragraph is removed from the Design Guidelines.

Figure 1

This figure has been added since the Regulation 14 consultation on the Hailsham Neighbourhood Plan Review to show where the Town Centre guidelines apply. The boundary is taken from the emerging Local Plan Regulation 18 mapping. As we stated in

our comments on the Neighbourhood Plan, WDC are in the process of updating our emerging Wealden Local Plan and these new boundaries are to be included in the Regulation 19 Local Plan in late 2026 as per the current LDS. It is not considered advisable to show a boundary that is subject to change in Figure 1.

Figure 2

This has been added since the Regulation 14 consultation on the Hailsham Neighbourhood Plan to show where the design guidelines apply. However, from the map it is still hard to determine exactly which design guideline apply and where.

- ***Area within which guidelines for major residential development and proposals for development outside the built up area apply-*** does this refer to all the guidelines in part c or just sections 5, 6 and 8? It needs to be clear. Also, it is not clear why the yellow hatched area has been selected? Given the scale of the map, it is going to be difficult to determine whether a site falls within or outside this boundary. There is also the possibility that development may occur outside the hatched area. It is suggested that part C (sections 5, 6 and 8) should apply across the whole neighbourhood area and that the map should be amended accordingly.
- ***Area within which guidelines for small residential development sites apply-*** presumably this relates to section 7 but this is not clear. It is not clear why this guideline is confined to the draft development boundary as shown in our own Regulation 18 Local Plan consultation, as there is the possibility that residential development may come forward outside of the development boundary. There are also issues with showing a development boundary which is still only in draft form and is subject to change through the Local Plan process. It is suggested that part 7 should apply to the whole neighbourhood area.
- ***Area within which guidelines for proposals in the town centre apply-*** This is based on our Town Centre Boundary in the emerging Local Plan which is still subject to change.
- ***Designated employment areas where existing design guidance applies-*** existing design guides will apply across the whole of the neighbourhood area, so it is not considered necessary to single out employment areas. It is recommended that this category is removed from the map.

It states at the bottom of the key that 'outside of the areas indicated existing design guidelines apply e.g. the Wealden Design Guide'. In fact, the Wealden Design Guide will apply across the whole district, including the neighbourhood area. It is suggested this sentence is removed.

Figure 3

As with the Neighbourhood Plan, it is recommended that on any mapping which contains the draft housing allocations and employment sites within the emerging Local Plan, that these should be removed as these are still subject to change within the 'Focused' Wealden Local Plan (Regulation 18) previously published for consultation and the Proposed Submission Wealden Local Plan (Regulation 19) that will be published later in the calendar year. It is recommended that the draft housing allocations and employment sites are removed from the map and these are subject to revision.

Conformity with the Council's Statutory Development Plan

In line with comments on the Neighbourhood Plan, there are significant references to the emerging Wealden Local Plan as opposed to the adopted statutory development plan that the Neighbourhood Plan will be assessed against at the examination stage. Therefore, there are concerns with prematurity and timing of the Neighbourhood Plan. Examples of this appear in paragraphs 2, 3 and 4 on page 5 that will need to be reviewed to remain current. Indeed, these paragraphs are a moment in time and will become out of date quickly. For example, the figures used in paragraph 3 on page 5 relate to the 'Focused' Wealden Local Plan (Regulation 18) consultation, which is still subject to change prior to the Regulation 19 consultation and during the examination.

Design Review

On page 5, penultimate paragraph, it states that a 'Design Review should take place for all major applications and also on smaller sites in sensitive or important locations'. As stated in our comments on the Neighbourhood Plan, WDC does not use a Design Review Panel and have no plans to use one in the immediate future. We previously suggested that this paragraph is removed from the HDG at the Regulation 14 stage of the Wealden Local Plan.

New Local Plan

On page 9 the HDG, it refers to draft policies in the emerging Local Plan. The quotations used are from the draft Wealden Local Plan (Regulation 18) consultation undertaken in March 2024 and the design policies will be altered for Proposed Submission Wealden Local Plan (Regulation 19) that will be published later in the calendar year. It is recommended that these quotations are removed as they will very soon be out of date.

Figures 11, 19, 20 and 25

It is recommended that on any mapping which contains the draft housing allocations and employment sites, that these should be removed as these are still subject to change as part of the Proposed Submission Wealden Local Plan (Regulation 19) later in the calendar year.

Materials

WDC are concerned that this section on page 15 is not in line with the text in the draft Conservation Area Character Appraisal document¹. Weatherboarding is not prevalent and neither is tile hanging. In addition, exposed timber frames are not common, and neither is thatch. We previously commented that this section should be amended to avoid conflict with the draft Conservation Area Character Appraisal document.

Page 67 of draft Conservation Area Character Appraisal states that: ‘Most of the older buildings in the area are constructed of materials from local sources. The predominant wall construction material is brick. Many of the buildings are also stuccoed (rendered). There has been little use of local flint on buildings, mainly limited to the church tower and some boundary walls. There is some use of tile-hanging, but it is mainly limited to architectural detailing. Weatherboarding is not a common historic material in the town. Older timber framed buildings have mainly been refaced in brick, with little exposed timber framing. Roofs are mainly gabled, with some hipped, and clay tiles are the main roofing material. Slate is also found on some of the 19th century buildings’.

The Consultation Statement accompanying the Hailsham Neighbourhood Plan explains that this section is not limited to the Conservation Area and refers instead to the whole town. In this case, we would recommend that this section is split between materials and details in the Conservation Area and those used in the rest of the town.

On page 21, WDC is concerned that this page mixes the high street character and vernacular, with the surrounding residential character areas. In our view, the two are really quite distinct. Also, there is no mention of inappropriate materials such as weatherboarding. Again, we would suggest that in this section, materials are clearly differentiated between those used in the Conservation Area and those used elsewhere in the town.

On page 27, WDC confirms that concrete tiles are not local to Hailsham. On page 61, weatherboarding is not local to Hailsham, and neither is concrete tiles. Hailsham was a clay brickmaking area, so clay tiles are the local material.

Part Pedestrianisation of High Street

Page 40-41- Having a section here on part pedestrianisation of the High Street will be confusing for users as it is an aspiration. It is recommended that the section on the pedestrianisation of the High Street is removed as it does not clearly relate to the remaining elements of the Design Guide. It is already a project within the Neighbourhood Plan, and it is not necessary to repeat here.

HTC-04: A pedestrian friendly, walkable environment

¹ [Draft Conservation Area Character Appraisal – Hailsham, December 2020](#)

Part 7- Balconies, Loggias and roof terraces are not characteristic of the town centre. We therefore suggest part 7 is amended to reflect this.

HTC-08: Change and development in the Conservation Area

In WDCs view, this reads more as policy than design guidance. It also conflicts with some of the preceding guidance. It is recommended that this is amended to just relate to design guidance. This could be incorporated in the NP as supporting text and this could consider guidance for specific details (e.g. ensuring windows are of appropriate materials, divisions, opening and form etc, resisting painting of traditional materials (i.e. brickwork and tile hanging), resisting inappropriate modern materials such as concrete tiles and liquid membrane on flat roofs etc, removing bollards, consideration of hard surfacing and street furniture.

WEL-02: Amenity Green Space.

In WDCs view, this also reads more as policy than design guidance. It is suggested that this is amended to just relate to design guidance.

RET-01: Sustainable drainage systems.

The guideline RET-01 seems to read more like planning policy, which is being prepared within the emerging Wealden Local Plan, than design guidance. Also, there are specific considerations for the Cuckmere and Pevensey Levels hydrological catchment area which have not been included.