



Hailsham Neighbourhood Plan

Consultation Statement

Volume 5: Regulation 14 Consultation (Annex)

Troy Planning + Design

March 2026



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Prepared by

Troy Planning + Design

33 Foley Street, London W1W 7TL

www.troyplanning.com

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Hailsham Neighbourhood Plan

Consultation

Report of Regulation 14 consultation:

Annex – Response to WDC Comments



March 2026

Part 1

Responses to comments on the Neighbourhood Plan

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
Figure 1	Is this map the most up to date it could be in terms of the built-up area?	Update built-up area on map. <i>HTC: Figure to be updated</i>
1.10	The scale and location of growth is reflective of policies in the Wealden Local Plan, but this is based on national planning policy and specifically calculation of housing need.	Add 'that are based on national planning policy' after Wealden District Local Plan. <i>HTC: No change to be made. National policy establishes a method to calculate housing numbers. This is not a mandatory target (if LPAs can justify a lower figure) and does not specify where development is to be located – these are decisions for the LPA.</i>
1.18	Is the last sentence required as it repeats paragraph 1.14	Remove last sentence <i>HTC: Sentence to be deleted</i>
1.23-1.25	There is currently no discussion on three different types of review modification of a Neighbourhood Plan.	Add a paragraph explaining the different stages of a neighbourhood plan review/the three different types of modification. <i>HTC: This is unnecessary. The Plan is a full review and the stages outlined have been followed. There is no need to explain that a minor review can be undertaken as this may confuse the reader. In any event, that is set out in the Modifications Statement.</i>
2.16	This paragraph will need to be updated for the Regulation 16 consultation. Our new Local Development Scheme (LDS) is here .	Update this paragraph following the publication of new LDS. <i>HTC: Para to be updated</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
2.17 and 2.18	<p>These paragraphs will need to be updated following the publication of the Draft 'Focused' (Regulation 18) Local Plan.</p> <p>If the Hailsham review of the NP is being submitted prior to the new Local Plan being adopted the review of the NP will need to be in conformity with the strategic policies in the existing development plan, including the adopted Local Plan. See separate comments. Of course, the emerging plan can be referenced but when considering if the NP meets the Basic Conditions, it will be tested against the statutory development plan, including the adopted Local Plan/Core Strategy.</p>	<p>Update the figures given in these paragraphs, including the total numbers and commitments for each settlement. These figures are as outlined in the Draft Wealden Local Plan Regulation 18 (March 2024) and have changed prior to the draft 'Focused' Wealden Local Plan (Regulation 18) consultation.</p> <p>This will change once more for the Regulation 19 Pre-Submission Wealden Local Plan that is due for publication near the end of Q2 of 2026/27.</p> <p><i>HTC: Text to be updated to reflect status of the Local Plan</i></p>
Figure 2	<p>The proposed allocations in the draft Wealden Local Plan (March 2024 (pink) along with the proposed employment sites (orange) are not part of an adopted plan, have not got planning permission, and are therefore subject to change.</p> <p>As highlighted above WDC have published its 'Focused' Wealden Local Plan (Regulation 18) for consultation and the proposed allocations may change again prior to the Regulation 19 Presubmission Wealden Local Plan consultation, that is planned for Q2 of 2026/27.</p>	<p>It is suggested that the proposed allocations in the draft Wealden Local Plan (pink) are removed from this map, along with the proposed employment sites (orange).</p> <p><i>HTC: Caveat to be added to all mapping to explain that these are subject to change. They remain important for context, help explain the pressure on land and wider growth aspirations established in the emerging WDC Local Plan, and thus why an update of the NDP (and production of associated design guidance) is required.</i></p>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
2.20	There are other strategic policies besides those relating to the natural environment, climate change and green infrastructure.	Change wording to 'relating to areas such as the natural environment, climate change and green infrastructure. It encourages...' <i>HTC: Text to be amended</i>
Vision	The vision is usually in the future tense as it is the vision for the future i.e. 2042.	Change the vision to the future tense. <i>HTC: No change. The text starts 'in 2042', which makes clear that this applies to a future position.</i>
Objective 4	The heading of chapter 7 has been changed to Movement but not Objective 4.	Change the objective heading to Movement. <i>HTC: To be updated</i>
Safe and convenient travel choices for all	There is some repetition between this section and the Movement section (Chapter 7). Can they be amalgamated to ensure the NP is succinct?	Look at amending the text to avoid duplication. <i>HTC: No change. As per the made Plan, this section is important to help explain the relationship with the ten-minute town concept.</i>
Policies and projects	There is some repetition between this section and the earlier section 'What is in the Neighbourhood Plan'. Can they be amalgamated to ensure the NP is succinct?	Look at amending the text to avoid duplication. <i>HTC: No change. This is included here to clarify the distinction between and purpose of policies and projects</i>
4.3	Policies in the emerging Wealden Local Plan are subject to change and are set out in draft only at this stage.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
4.5	'A new medical centre was to be delivered as part of the 'Aspires' proposal for the regeneration of the town centre that have since paused'	Change to 'has' rather than 'have'. <i>HTC: Text to be updated</i>
4.6	We have produced an update to the Infrastructure Delivery Plan (IDP) as part of the 'Focused' Draft Wealden Local Plan (Regulation 18) consultation, named the IDP Story Map and Delivery Schedule.	Update this paragraph following the 'Focused' Draft Wealden Local Plan (Regulation 18) consultation to include the latest information. <i>HTC: Text to note that the IDP is subject to review as work on the Local Plan progresses</i>
Policy HaCF1: Healthcare	Part 5 does not read correctly.	Replace 'and which' with 'that' and remove the 'comma' prior to 'should be explored'. <i>HTC: Text to be amended</i>
4.13	This paragraph refers to 'The emerging Wealden Local Plan also includes various standards'. At this stage in the NP and all times prior to the adoption of the new Local Plan, the first sentence should also refer to our Statutory Development Plan as it stands.	Add reference to the Statutory Development Plan. <i>HTC: Sentence referring to the Local Plan to be deleted.</i>
4.14- 4.15	Policies in the emerging Wealden Local Plan are subject to change and are set out in draft only.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
4.17	We have produced an update to the IDP as part of the 'Focused' Draft Wealden Local Plan (Regulation 18) consultation, named the IDP Story Map and Delivery Schedule.	Update this paragraph following the 'Focused' Draft Wealden Local Plan (Regulation 18) consultation to include the latest information. <i>HTC: Text to note that the IDP is subject to review as work on the Local Plan progresses</i>
4.18	Presumably the last sentence relates to Hailsham, not the district as a whole?	If this relates to Hailsham specifically then the last sentence should state this. <i>HTC: Text to be updated to clarify that it refers to Hailsham specifically</i>
4.18-4.19	References to the draft Infrastructure Delivery Plan (March 2024) - this information would be based on draft site allocations within the Local Plan (as well as current commitments) at that time so is not fixed and cannot be relied upon until the Local Plan reaches the Regulation 19 stage.	Update these paragraphs following the 'Focused' Draft Wealden Local Plan (Regulation 18) consultation to include the latest information. <i>HTC: Text on status of IDP to be updated as at para 4.17</i>
HaCF2: Education and Early Years	Capital letters are required in the heading for Early Years.	Adjust the heading to Education and Early Years <i>HTC: Text to be amended</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
<p>HaCF3: Community halls, centres and hubs.</p> <p>Parts 3 and 4</p>	<p>The evidence necessary for this will be determined by the LPA (via the validation criteria) and we are not sure this can be dealt with through a NP. There is no discussion on the evidence required in any part of this policy and viability would also need to be considered.</p> <p>In addition, the LPA would consider this on a District wide basis, and this would need to be wider than just the NP area as identified in part 3 (i.e. Hellingly Parish may be able to provide a community facility that is suitable for residents in the north of Hailsham town for example). Therefore criteria 3 and 4 of this policy is not supported by WDC at this stage.</p>	<p>Remove parts 3 and 4 of the policy.</p> <p><i>HTC: This is a fairly standard Policy clause for inclusion in a Neighbourhood Plan. Indeed, the made Horam NDP includes similar text (at Policy HCF1). It is unclear why WDC think this creates additional validation criteria. It establishes good principles that 'should' (as opposed to 'must') be met by new development. Indeed, much of the text reflects that which already appears in the made version of the Hailsham Neighbourhood Plan. If the concern is around inclusion of the text 'within the Neighbourhood Plan area', this can be expanded to say 'or in reasonable distance of the community using that facility'.</i></p>
<p>4.25, 4.26, 4.29, 4.36 and Part 1 of the policy HaCF4</p>	<p>Should be Wealden Open Space Report (2022) rather than study.</p>	<p>Adjust the title of the Report. A link is required in the policy to the Report.</p> <p><i>HTC: Reference to be updated. Link is already provided in Para 4.25.</i></p>
<p>HaCF4: Allotments and food growing</p> <p>Part 1</p>	<p>WDC will define when planning obligations/financial contributions are required, dependent on policies in its statutory development plan. This will also be dependent on viability evidence (not yet shown in the Hailsham NP) to justify such a requirement as required paragraph 35 of the NPPF. Part 1 of the policy is therefore not appropriate. The provision of allotments can be supported but the NP cannot require this.</p>	<p>It is suggested that part 1 is removed.</p> <p><i>HTC: No change. The text in Part 1 makes reference to WDC Space standards. The Neighbourhood Plan does not establish requirements in this respect.</i></p>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
4.32	The emerging Wealden Local Plan is subject to change and are set out in draft only.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>
HaCF5: Sports facilities and playing pitches Part 1b	The word 'avoiding' does not follow on from 'should'.	Replace 'avoiding' with 'avoid' <i>HTC: Text to be amended</i>
4.36	Should be Wealden Open Space Report (2022) rather than study.	Adjust the title of the report. <i>HTC: Text to be amended</i>
HaCF6: Play and Amenity Space Part 1	It is for WDC to determine what play and amenity space is required on a case-by-case basis, based on our statutory development plan. The provision of play space can be supported within the Neighbourhood Area, but the Hailsham NP cannot require this. It is stated that 'proposals for new residential development (resulting in a net gain of new homes) should contribute towards the provision of accessible and inclusive natural & semi-natural green spaces, amenity green space and play space for children and young people'. This does not correspond with draft Policy INF8: Open space, Sports and Recreation Provisions in the draft Wealden Local Plan (March 2024), which requires open space and recreation	It is suggested that the opening paragraph of Part 1 of the policy is rephrased to support such provisions, or it could be removed and left as criteria for when green spaces are proposed as part new residential development schemes. <i>HTC: The Policy does not establish nor require certain standards to be met but instead refers to those established by WDC. This form of wording appears in the made Horam NDP. No change required.</i>

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	provision on residential development of 10 or more dwellings (net). This draft policy is also subject to change at the Regulation 19 stage.	
PAS 01 Transforming existing residential streets into green streets	This is aspirational and unlikely to be achieved, particularly for existing streets. Does this need to be in the NP, given it is already in the Design Guide and Code?	Remove the project from the NP. <i>HTC: No change. Hailsham is an area deficient in open space and potential exists to increase this through the transformation of existing streets. Placing this in the Neighbourhood Plan enables communities to come forward with proposals for change</i>
4.43	'The draft Wealden Infrastructure Delivery Plan Part 2 notes that, as the emerging Local Plan progresses, further work will be undertaken to assess burial needs across the district'. At this stage in the plan-making process, this is unlikely to be progressed in the emerging Wealden Local Plan.	Sentence to be removed. Please see the update to the IDP Story Map for the 'Focused' Regulation 18 Wealden Local Plan consultation, or for more detail, the final IDP later in 2026. <i>HTC: Sentence to be removed.</i>
HaCF8: Community Infrastructure Delivery Part 2	In practice, this would be for the developer to agree with the LPA through a planning obligation, and we are not sure this adds anything beyond what we would normally expect on these issues.	Remove part 2. <i>HTC: No change. Similar wording appears in the made version of the Hailsham Neighbourhood Plan and, more recently, similar policy wording appears in the made Horam Neighbourhood Plan. Delivery of infrastructure is a major concern in Hailsham, as expressed through consultation, and existing policy is not working. It is therefore important to state this in the Plan.</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
HaCF8: Community Infrastructure Delivery Part 3	It is for the District Council to determine what documents need to be submitted with a planning application as part of its validation criteria. Neither the emerging Local Plan, nor a Neighbourhood Plan should dictate the documentation submitted by a developer in terms of a planning application and this should only be documented in the LPAs validation list.	Remove part 3. <i>HTC: The policy text includes the word 'should' as opposed to 'must' or 'require'. Applicants are encouraged to consider this but are not required to do so. It does not therefore comprise additional validation criteria.</i>
5.2	'The extent of the Town Centre, as defined in the emerging Local Plan, is illustrated in Figure 7' There is an issue with prematurity here. It is dependent on what version of the Local Plan this is in conformity with. We are in the process of updating our emerging Wealden Local Plan and these new boundaries are likely to be adopted in 2027 as per the current LDS and are subject to change.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Plan to be marked as draft and subject to change</i>
Figure 7	As discussed above, the Town Centre Boundary and primary shopping area are subject to change.	Update this figure following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Plan to be marked as draft and subject to change</i>
5.8	In our view, this paragraph could be moved to the Design Guide and Code?	Move to Design Guide and Code. <i>HTC: These are important to include in the Neighbourhood Plan as they help establish the wider context for change and the way in which policies and other ideas for the town centre should be interpreted. Similar text to</i>

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		<i>this was included in the made version of the Neighbourhood Plan and is retained. It is not appropriate to move to the Design Guide & Code.</i>
HaTC1: Town Centre Uses	In our view, there are elements of this draft policy that just repeat national policy and the emerging Local Plan policy TC1. Repetition is not necessary and we are unsure whether this policy is indeed needed on this basis. It should also be noted that town centre boundary within the emerging Wealden Local Plan is subject to change.	Remove repetition from the policy. <i>HTC: Until such time as the new Local Plan is adopted this policy establishes appropriate uses for the town centre. Elements of it may be superseded at a later date. It includes components from the made version of the Hailsham Neighbourhood Plan that are carried forward. Consultation has highlighted the importance of supporting a mix of uses in the town centre.</i>
5.17 and 5.18 and HaTC2 part 2a	Should be Conservation Area Character Appraisal	Add in the word 'Character'. <i>HTC: Text to be amended</i>
5.18	'better integrate the Church within the town centre'. It is not clear what this means. 'development should enhance the qualities...'	Explain what is meant by this sentence. It is suggested that this sentence is changed to 'proposals should preserve or enhance the historic environment'. <i>HTC: Text to be amended</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
5.22 - 5.24	'This may include the retrofitting, refurbishment and upwards extension of buildings,' This will be heavily constrained by the character and appearance of the Conservation Area and the number of Listed Buildings.	<p>Along with paragraphs 5.22 and 5.24, changes within the designated conservation area or within its setting will need to be supported and justified by a more thorough heritage led strategy to preserving and enhancing the historic environment. Changes need to be informed by an understanding of spaces and how the town centre has developed and this should lead the identification of sites within the town centre for redevelopment and then to guidance on how these sites could provide a positive enhancement of the historic environment. Alterations to buildings within the Conservation Area will need to reflect a heritage led strategy.</p> <p>See comments around adding a heritage policy to the NP which would address many of these issues.</p> <p><i>HTC: Additional text to be added to note that proposals for change need to be set within the wider context, including the historic environment, and impact of change on views of local landmarks (e.g.: the view of the Church along the High Street)</i></p>
5.23	The word maximise does not work here.	<p>Replace 'maximise' with 'maximising'</p> <p><i>HTC: Text to be amended</i></p>
<p>HaTC2: Town Centre Design Principles</p> <p>Part 1</p>	<p>If these points are already in the Design Guide and Code do they need to be repeated in the policy?</p> <p>Heritage significance should be referred to.</p>	<p>Consider using part 1 to reaffirm that proposals need to comply with the Design Guide and Code rather than repeating the guidance.</p> <p><i>HTC: These design principles are important to shaping and informing good design in the town centre. Simply saying that these should be had regard to (if they were moved to the Design Guide and Code) would weaken the intent. Similar principles were included in the made version of the Neighbourhood Plan and</i></p>

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		<p><i>are carried forward into this, with consultation responses highlighting the importance of creating an attractive town centre.</i></p> <p>Need to include 'heritage significance' in first sentence, along with design, character and location.</p> <p><i>HTC: Text to be amended</i></p>
<p>HaTC2: Town Centre Design Principles</p> <p>Part 1c</p>	<p>We are not convinced 'balconies' are appropriate within the Conservation Areas and are not a common feature - if a feature at all - at present.</p>	<p>Remove reference to balconies.</p> <p><i>HTC: No change. The conservation area is not the same as the town centre. Opportunities for change and development outside the conservation area may be appropriate for inclusion of balconies, particularly should higher density development apartment type come forward where private open space is required for each dwelling.</i></p>
<p>HaTC2: Town Centre Design Principles</p> <p>Part 1f</p>	<p>This is a land ownership issue rather than a planning issue per se. You could state that you wish to see town centre development take place comprehensively, which would be more positively worded, or to ensure that development opportunities are not lost through 'poor' design.</p>	<p>Remove part 1f or rephrase this in line with WDC comments.</p> <p><i>HTC: No change. Comprehensive development could result in the creation of large structures which do not provide flexibility or adaptability over time, replicating existing issues. New change should support a finer grain pattern of development that can change over time, without the need for further major intervention.</i></p>
<p>HaTC2: Town Centre Design Principles</p> <p>Part 2c</p>	<p>Conservation Areas are heritage assets in their own right.</p>	<p>Change the sentence to 'avoiding any adverse effects on the Conservation Area, other heritage assets or their settings'.</p> <p>Does there need to be a separate part 1 and part 2? As they are integrated, we</p>

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		<p>consider there is conflict between the two parts.</p> <p><i>HTC: Text in Part 2c to be amended. There is no need to merge Part 1 and 2. Part 2 was specifically added in response to earlier comments from WDC. Parts 1 and 2 (and 3) will all need reading together when informing and determining applications. There is no conflict between the different Parts of the policy.</i></p>
<p>HaTC2: Town Centre Design Principles</p> <p>General</p>	<p>There are a few conflicting elements to this policy which will be difficult to relate into a design that would preserve or enhance the character and appearance of the Conservation Area. It is too prescriptive in our view.</p>	<p>WDC believes that this policy should be on a more site-specific basis to reflect an appropriate scale, massing, design, articulation and floor to ceiling to street ratio based on immediately surrounding development.</p> <p><i>HTC: Earlier iterations of the Design Guide and Code included a town centre concept masterplan and principles for development of sites. This was removed upon advice from WDC, highlighting the need for SEA and HRA. The aspiration is thus to work with partners to prepare a masterplan for the town centre as a separate document and which would provide additional site specific detail. This is included as a project in the Neighbourhood Plan. Many of the principles already form part of the made Neighbourhood Plan and are carried forward into this version.</i></p>
<p>Project TCM-01: Town centre concept masterplan</p>	<p>Given the timings of Local Government Reorganisation (LGR), we cannot commit to anything on this at this stage and we cannot speak on behalf of the County Council or other landowners/stakeholders either.</p>	<p>We therefore suggest that this project is not included.</p> <p><i>HTC: The project does not commit third parties to prepare a masterplan. It is of course important since the failure of the Wealden-led Aspires project failed. A concept masterplan was prepared for inclusion in a previous draft of the Neighbourhood Plan but removed following discussion with WDC given the need for further landowner discussion and necessity for SEA and HRA. Change and</i></p>

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		<i>transformation is clearly required in the centre and needs shaping through a spatial strategy. The project is to remain, though reference will be added to LGR and possible partners within this.</i>
5.25 and elsewhere	'Twittern' should be spelt 'twtitten'.	Replace all examples of 'twittern' with 'twtitten'. <i>HTC: Text to be updated</i>
5.27	Full stop missing at the end of the paragraph.	Add full stop. <i>HTC: Text to be updated.</i>
HaTC3: Safety by Design Part 1	'the setting and character of the Conservation Area and heritage assets within it'. Does this policy, which relates to safety by design, need to refer to the setting and character of the Conservation Area and heritage assets within it? Draft policy HaTC2: Town Centre design principles 2c already refers to avoiding any adverse effects on the Conservation Area, heritage assets or their setting.	Remove reference to heritage assets from this policy. Please also see comments on page 3 of our comments regarding adding a heritage policy. <i>HTC: This text was added following receipt of comments on an earlier draft of the NDP from WDC which did not make specific reference to heritage. Whilst it is agreed that heritage is addressed elsewhere (including at national level, and thus perhaps not needed here – as initially considered by HTC), the text is to be retained in line with earlier comments and is to be considered through the examination process.</i>
HaTC3: Safety by Design Part 2	'Proposals for development should take an approach to co- design and Collaboration'. This should be reworded to read better and to provide clarity that it lacks. It is also not clear if this relates solely to development in the Town Centre. If it does, this should be added to the wording.	WDC recommends that you could replace the text with 'Proposals for development (in the Town Centre?) should take a co- design and collaborative approach to design'. <i>HTC: The entire section of this part of the NDP relates to the town centre, so it should be clear. But, the text will be amended as suggested.</i>

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HaTC4: Shopfront design and signage Part 2	External roller shutters are not something we can condone in a CA - regardless of design.	Amend the wording to state that external roller shutters are not supported in Conservation Areas. <i>HTC: Text to be amended</i>
HaTC4: Shopfront design and signage Part 4	Conservation Areas are heritage assets in their own right.	Change the sentence to 'avoiding any adverse effects on the Conservation Area, other heritage assets or their settings'. <i>HTC: Text to be amended</i>
HaTC4: Shopfront design and signage General	This policy is not entirely consistent with what we are intending to put forward in the emerging local plan. You need to avoid the word 'should' and instead use the word 'shall' which is stronger. However, this draft policy repeats and/or conflicts with our own draft policy and our design guide as existing and there is a question as to whether it is needed?	To revise the policy to better conform with our own emerging policy and Design Guide. In addition, we also have listed buildings within the town centre which have shop fronts, so there will be other requirements other than just the Conservation Area. <i>HTC: Heritage assets (which included listed buildings) are referenced in Part 4 of the Policy. No need to amend further.</i>
Public realm, gateways and wayfinding	This is a lengthy section which could be rationalized in our view.	Shorten the supporting text. <i>HTC: No change. The supporting text is important to highlight the issues and opportunities, removal of which will diminish the impact and necessity of the Policy.</i>
5.44-5.47	The Council own the South Road car park; Tesco's own their car park and there will be other owners along North Street. Have discussions taken place with our assets team and the other owners. Is the installation of these gateways realistic?	To remove text around Gateways if no firm action has taken place with landowners on these assets. It would also shorten the Plan. <i>HTC: No change. These are included as identified opportunities. They do not require change to take place, nor do they impose any burdens on landowners. They should be seen as enabling text (as part of an enabling policy) which seeks to influence 'better'</i>

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		<i>should opportunities for change come forward at some point in the future.</i>
HaTC5: Public realm, gateways and wayfinding Part 1	PRG 01 is a project and should not be referred to in the policy.	Remove reference to PRG-01 in part 1 of the policy. <i>HTC: Disagree. This signposting is added to help support delivery of wider ideas should the opportunity for change and development come forward. There is no requirement for these ideas to be delivered (the wording says 'should'), though they should be considered as appropriate to help inform coordinated change across the town centre.</i>
HaTC5: Public realm, gateways and wayfinding Part 3	It is suggested that Part 3 would work better as part of the following project, PRG-01. There needs to be some realism shown, particularly if landowners are unaware of these proposals.	Move Part 3 of the policy to project PRG-01. <i>HTC: No change. These are principles to be used and act as enabling policies.</i>
HaTC5: Public realm, gateways and wayfinding Part 5	Conservation Areas are heritage assets in their own right.	Change the sentence to 'avoiding any adverse effects on the Conservation Area, other heritage assets or their settings'. <i>HTC: Text to be amended</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
Project PRG-01	Parts of this project reads more as policy wording rather than a potential project. For example, 'opportunities should be taken that contribute to the greening of the urban environment' or 'opportunities should be taken that improve the quality of the pedestrian experience'.	<p>Rephrase those parts of the project that give directions as to what should be done.</p> <p>This project will also need to be informed by a heritage strategy to ensure that appropriate improvements are proposed - not just to the Conservation Area and its public realm, but how this impacts Listed Buildings too. There is much potential to declutter and improve the public realm and preserve and enhance heritage assets - significance and setting.</p> <p><i>HTC: No change. All projects are subject to further review, study and consultation. They will evolve over time.</i></p>
HaTC6: Public art	This policy may be better positioned as design guidance rather than policy. Alternatively, it could be amalgamated into the previous policy, particularly if elements are removed as we suggested.	<p>Consider amalgamating this policy with the previous policy or moving it to the Design Guide and Code.</p> <p><i>HTC: No change. The previous policy is primarily related to streets and spaces whereas this policy has a different focus on specific features and thus different principles apply.</i></p>
HaTC6: Public Art Part 1a	'be located in a public space, it is well integrated with the space, avoiding physical obstruction and impeding sightlines'. This does not currently make sense as worded in our view.	<p>Change wording to 'located in a public space, be well integrated with the space and avoid physical obstruction and impeding sightlines'.</p> <p><i>HTC: Text to be amended</i></p>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
HaTC6: Public Art Part 1 f	Public art does not always require planning permission, particularly if temporary. It may require Listed Building Consent, although less likely unless relating to a listed curtilage wall. Nonetheless for the art that does require planning permission or Listed Building Consent, a management plan would be a validation requirement outside the scope of a NP.	Remove part 1f. <i>HTC: The policy does not require a management plan to be prepared. It uses the word 'should' rather than 'must', and thus encourages preparation. The words 'where appropriate' will be added to the policy to make clear that different circumstances apply subject to location etc.</i>
HaTC7: Roofscape Part 2	This can be supported but not required through the planning application process.	Change the wording of part 2 to support this rather than requiring this. <i>HTC: Part 2 already includes the word 'should'. No change required.</i>
HaTC7: Roofscape Part 4	Conservation Areas are heritage assets in their own right.	Change the sentence to 'avoiding any adverse effects on the Conservation Area, other heritage assets or their settings'. <i>HTC: Text to be amended.</i>
5.67	'Development of existing surface car parks to the rear of the High Street would help meet windfall housing targets for development in Hailsham, support provision of new town centre uses, and enable improvements to the quality of the centre and visitor experience, repairing the urban fabric of the town'. This is a decision for Wealden District Council to make as part of the emerging Wealden Local Plan.	Remove this sentence. <i>HTC: How is the submitting of a windfall application the decision of WDC to make through the Local Plan (unless the Local Plan includes policies that preclude such applications)? The word 'would' to be changed to 'could'.</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
HaTC8: Town centre parking Part 3a	<p>'The proposal does not result in unnecessary traffic movement to, in and around the town centre'.</p> <p>It is not clear how this could be demonstrated by an applicant, or what is meant by this?</p>	<p>Remove this sentence.</p> <p><i>HTC: No change. This form of wording already appears in the made version of the Neighbourhood Plan.</i></p>
HaTC8: Town centre parking Part 3e	<p>Conservation Areas are heritage assets in their own right.</p>	<p>Change the sentence to 'avoiding any adverse effects on the Conservation Area, other heritage assets or their settings'.</p> <p><i>HTC: Text to be amended</i></p>
HaTC8: Town centre parking Part 3	<p>Could part 3 of HaTC 8: Town Centre parking be moved to the design guide and code?</p>	<p>Consider moving part 3 to the Design Guide and Code.</p> <p><i>HTC: Not all of these principles are design specific and some already appear in policy in the made version of the Neighbourhood Plan. No change.</i></p>
HaHD1: Housing design and character Part 2	<p>Could part 2 of HaHD 1: Housing design and character be moved to the Design Guide and Code?</p>	<p>Consider moving part 2 to the Design Guide and Code.</p> <p><i>HTC: No change. The importance of this approach was highlighted through consultation, with concerns expressed as to the impact of new development on the town (and many noting the impacts of development that has taken place). Removing this to the Design Guide & Code will weaken the intent and risk existing development models being repeated.</i></p>
Project DC-01: Architectural variety and innovation	<p>It is not clear how this project will work? Will you approach developers directly regarding the first sentence? This project does not appear to be realistic. The second sentence does not seem to relate to a project as such.</p>	<p>Remove this project from the NP.</p> <p><i>HTC: No change. This is a project, not a requirement. Applicants may follow this approach in recognition of the aspiration set in the Plan and which might help smooth the planning process. Different designs could relate to phases of development, or sections to be taken forward by different landowners. This is an approach reflected in large scale</i></p>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
		<i>developments elsewhere and is one that could be taken forward in Hailsham to help drive design quality, variety and interest.</i>
6.15	'windfall' development, which are typically (but not always) smaller developments of fewer than ten homes (see full definition in the glossary).' The definition in the glossary is also incorrect as sites do not have to have been previously developed. The definition in the NPPF is simply 'Sites not specifically identified in the development plan'.	Remove the definition of windfall development in the Plan or revise to align with the NPPF. <i>HTC: Text to be amended</i>
HaHD2: Well integrated residential development Part 5	The first paragraph of part 5 sets out a strategic approach to site allocations which a NP cannot do, given that site allocations are within the remit of emerging Wealden Local Plan. A-E in Part 5 are in effect setting out validation criteria. In the emerging Local Plan, we have a policy on both master planning and on ensuring comprehensive development. Part 5 is therefore duplication of emerging planning policy and should be considered at the district level, particularly as site allocations are not proposed as part of the Hailsham NP.	Remove part 5 <i>HTC: No change to be made. The text in Part 5 already forms part of the made Neighbourhood Plan (see Policy HAIL SD1). Also note that this is not establishing a requirement for applicants to meet in order for schemes to be validated as the text clearly uses the work 'should' rather than 'must'.</i>
6.22	This refers to the emerging Local Plan which is subject to change.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout.

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
		<i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>
HaHD3: Sustainable design and construction	With no viability evidence specific to Hailsham provided, much of this policy will come under scrutiny by the housebuilders. Our own emerging Local Plan has been assessed using a whole plan viability assessment and tested through this process. However, even for us as the LPA, this has not been examined or agreed through the Local Plan process.	Therefore, it is suggested that this policy is either removed or amended to just consider design and/or supporting developers that do take these actions. <i>HTC: The policy text does not mandate standards to be met by new development, but does make clear the aspirations for a more sustainable approach and aspects that applicants 'should' (as opposed to must) meet. The form of wording is one that can be found in numerous Neighbourhood Plans elsewhere. Whilst housebuilders may indeed scrutinise the approach this does not invalidate the support expressed for them to deliver better. No change to the Policy.</i>
HaHD3 Part 1g	If you wish to use this figure you would need the evidence base to support this. The figure in the government's EIP is a proposed action only. The draft Local Plan policy CC6 requires a target of 110 l/p/d based on enhanced Building Regulations standards at that time. The Government are currently reviewing these enhanced building regulations standards. We are also carrying out a water cycle study which may alter this figure too. This figure would need to be viability tested and even for our own Local Plan, this figure has not been tested through an examination process at this stage and is subject to change as alluded to above.	This water efficiency standard should be removed from the policy. <i>HTC: No change – the Environment Improvement Plan allows for standards of 100 l/p/d to be established in water stressed areas, which include Hailsham, as per the supporting text.</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
HaHD3 Part 5	Conservation Areas are heritage assets in their own right.	Change the sentence to 'avoiding any adverse effects on the Conservation Area, other heritage assets or their settings'. <i>HTC: text to be amended.</i>
6.35	WDC does not currently have a Design Review panel and are unlikely to do so in the foreseeable future.	It is suggested that this reference is removed. <i>HTC: No change. The text and associated project is carried forward from the made Neighbourhood Plan.</i>
Project DR01: Design review	It is not clear how this project would be realised. WDC do not currently use a Design Review Panel. It is our decision whether to have a policy or process in place to use a panel and currently we do not.	It is suggested this project is removed. <i>HTC: No change. The text and associated project is carried forward from the made Neighbourhood Plan. It is to be noted that this is a project / aspiration as opposed to a policy, and although WDC does not use a review, this process is encouraged by the NPPF.</i>
6.42	Without figures, dates etc. the first sentence is meaningless given how many existing homes there are in Hailsham. 'Although it shows that prices are lower in Hailsham than they are District-wide, the median house price across Wealden is 11.55 times median earnings' This needs clarification as to when this was, i.e. what year, as this changes every year.	It is suggested that this sentence is amended to concentrate on using the evidence, as you have done further on. Add clarification as to what year this refers to. <i>HTC: Reference to the word 'meaningless' is unfair. Reference to where the 11.55 times median house prices comes from should be clear in respect of the link provided to WDCs own evidence. A separate HNA and HNS has now been undertaken by the Town Council and this will be referenced in an update of the Plan to help justify the policy approach taken.</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
HaHD4: Housing mix, size and type Part 1	<p>There is some repetition here of policy HO1 in the emerging Local Plan although it is not quite the same as the Wealden draft policy also includes 4-bedroom homes and differentiates between market and affordable housing.</p> <p>'and where the mix includes a supply of affordable rented homes'. This part of the sentence does not make sense as currently worded.</p>	<p>It is suggested that part 1 is removed and left to the emerging Local Plan to define unless robust evidence can be provided as to why you differ from the Council's own LHNA. It should be noted that we have also updated the LHNA as part of the 'Focused' Draft Wealden Local Plan that is out to consultation.</p> <p><i>HTC: The Town Council has now prepared a Hailsham specific HNA and HNS which will be used to support and justify the policy in the NDP.</i></p>
HaHD4: Housing mix, size and type Part 2	Part 2 of the policy repeats policies in the emerging Local Plan.	<p>Remove part 2.</p> <p><i>HTC: Text to be retained until such a time as the new Local Plan is adopted (after which it will be superseded by that).</i></p>
HaHD4: Housing mix, size and type Part 6	It is likely that many elements of part 6 will not require planning permission, so is this part of the policy required?	<p>We recommend the removal of this policy.</p> <p>Nonetheless, if you are going to keep this part we would suggest replacing 'independently' with 'together', thus not supporting independent dwellings in all situations, including in the countryside, which are generally not support.</p> <p><i>HTC: No change. The findings of the HNA and HNS indicate the need to consider different housing models that allow for changing lifestyles and demographic patterns. There is also no requirement for applicants to deliver this form of housing. It is an enabling form of policy that indicates to applicants that they should consider providing this type of product (although they are not required to).</i></p>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
6.54	'The emerging Local Plan, at Policy HO5, says that 5% of all plots on sites of twenty homes or more should be set aside for self and custom build opportunities, and that these should be taken up within twelve months (or other agreed period)' The emerging Local Plan is subject to change.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>
HaHD5: Self and custom build homes Part 1a	It is not for the NP to set validation criteria for WDC.	It is suggested that part 1a is removed. <i>HTC: This policy uses the word 'should' rather than 'must' and is not therefore a requirement. Similar wording exists in the made Neighbourhood Plan (Policy HAIL D4).</i>
6.63	The emerging Wealden Local Plan is subject to change.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>
HaHD6: Street types, design and hierarchy Part 2	Part 2 sets validation criteria, which a NP cannot do.	Remove 'and details of these should accompany planning application material'. <i>HTC: No change. The policy uses the word 'should' rather than 'must'. It does not dictate that material must be provided. The quality of the street network has a major bearing on the quality of place created and is appropriate for this to be set out in policy.</i>
6.72	The emerging Wealden Local Plan is subject to change.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
HaHD7: Parking in new residential development	Is this policy required given that ESCC set the parking standards and are the highway authority and WDC have a draft policy on parking provision in the emerging Local Plan? Part 2 could be covered in the Design Guide and Code.	<p>Consider removing this policy.</p> <p><i>HTC: Although parking standards do exist these do not translate into design principles. This is important as the type and location of parking that is provided, and how, has a major impact on the quality of the built environment. This is evidenced through issues associated with parking in recent developments in Hailsham and was raised as a major area of concern through consultation. It is entirely appropriate for this to be included in a NDP Policy (as is done so in examples of NDPs elsewhere). A similar, though shorter, version of this policy appears in the made the Neighbourhood Plan.</i></p>
Project MHT-01: Crossing the A22	It is not clear here whether this project has been discussed with ESCC and whether it is feasible or indeed the funding required.	<p>Discuss with ESCC before including it as a potential project.</p> <p><i>HTC: The project has been discussed with ESCC and is advancing. No change required</i></p>
Project MHT-02: The Hailsham Country Line	It is not clear here whether this project has been discussed with ESCC and whether it is feasible or indeed the funding required.	<p>Discuss with ESCC before including it as a potential project.</p> <p><i>HTC: Projects have been discussed and will continue to be developed with partners. In respect of this particular project, the majority of land through which the route would run is in the ownership of HTC. No change.</i></p>
7.21	The emerging Wealden Local Plan is subject to change.	<p>Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout.</p> <p><i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i></p>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
7.25	'In these circumstances new routes within residential developments should incorporate sustainable, safe, and effective infrastructure that supports bus use'. As the development is coming forward through the Local Plan is this not a consideration for the Local Plan itself alongside infrastructure providers?	Consider removing this sentence. <i>HTC: It is unclear why this sentence should be removed. The aspiration for development to be based around sustainable patterns of development is crucial. The need for better bus infrastructure was highlighted through consultation. Recent growth around parts of Hailsham have failed to do this and disadvantage those communities. The expectation that growth areas should incorporate bus infrastructure is already established in the made Neighbourhood Plan (see Policy HAIL AT3). No change.</i>
Figure 20	The potential allocation sites have changed between the Draft Wealden Local Plan (Regulation 18) consultation in March 2024 and the 'Focused' Draft Wealden Local Plan (Regulation 18) out for consultation (February 2026). This will likely change again prior to the Pre-Submission Wealden Local Plan (Regulation 19), rendering the map as inaccurate.	It is suggested that the draft allocation sites and employment sites are removed from this plan. <i>HTC: Caveat to be added to map to explain that these are subject to change. They remain important for context, help explain the pressure on land and wider growth aspirations established in the emerging WDC Local Plan, and thus why design guidance is required.</i>
HaM3: Public transport Part 2	See the Examiner's comments on the Horam NP. He moved the detail of the distances to bus stops to the supporting text as he did not consider it to be a land use policy.	Move the detail of the distances to the bus stops to the supporting text as per the Horam NP. <i>HTC: This clearly is a land-use issue as it relates to the sustainability of development, the layout of this and density of it. The walking distance is well-established and is a factor considered by Inspectors in determining appeal decisions where the suitability and sustainability credentials of a site are in question. The distance used is based on research undertaken and published by the CIHT and also informs the guidance on 20-minute neighbourhoods which WDC refers to in the emerging Local Plan. This guidance is similar to the 10-minute town concept in the Neighbourhood Plan. It is noted that reference to development being within 400m</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
		<i>of public transport also appears in draft Policy INF2 of the emerging Local Plan.</i>
Figure 21	Some of the potential community hubs fall within Hellingly Parish and are therefore outside the scope of the Hailsham NP.	Remove those potential hubs which fall outside of the neighbourhood area. <i>HTC: The key makes clear that some of these might be located in Hellingly. The caption will be expanded to clarify that these are beyond the Plan boundary but should ideally be considered as part of a comprehensive network that responds to the reality of the place as a whole. The Policy however only applies to the Plan area.</i>
HaM4: Community mobility hubs	Would this be better suited as a project rather than a policy? It would be unlikely that anyone other than the Town Council would be proposing to develop these hubs.	Change this to a project and move part 2 to the Design Guide and Code. <i>HTC: No change. These are not design matters but rather elements that could combine as part of a Hub. Similar policies appear in other NDPs that have been made elsewhere.</i>
7.46	The emerging Wealden Local Plan is subject to change.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>
7.50-7.53	This section on street maintenance deals with non-land use issues.	It is suggested that this section is removed for sakes of brevity. <i>HTC: This text has been specifically inserted into the Plan to respond to considerable concerns raised through the consultation process as to the nature of the street environment and maintenance of this. Although not a land use matter, and not the responsibility of HTC, it is important to make clear to residents where the responsibility lies and that the Plan has not simply ignored this.</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
8.3	The emerging Wealden Local Plan is subject to change.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>
Figure 23	The potential allocation sites have changed between the Draft Wealden Local Plan (Regulation 18) consultation in March 2024 and the 'Focused' Draft Wealden Local Plan (Regulation 18) out for consultation (February 2026). This will likely change again prior to the Pre-Submission Wealden Local Plan (Regulation 19), rendering the map as inaccurate.	It is suggested that the draft allocation sites and employment sites are removed from this plan. <i>HTC: Caveat to be added to map to explain that these are subject to change. They remain important for context, help explain the pressure on land and wider growth aspirations established in the emerging WDC Local Plan, and thus why design guidance is required.</i>
8.7	This paragraph will need to be amended if changes to the BNG requirements and exemptions are brought in. Note that in the emerging Wealden Local Plan, we are seeking a net gain in biodiversity from all appropriate development. As set out in emerging policy and legislation a minimum of a 10% gain in biodiversity is being sought which will increase to 20% on qualifying sites.	Add reference to the 20% on qualifying sites when referencing the emerging Wealden Local Plan. <i>HTC: Text to be amended</i>
Biodiversity	It may be worth also referencing the Environmental Improvement Plan (EIP23), published in January 2023, which sets out government plans for significantly improving the natural environment.	Add reference to the Environmental Improvement Plan (EIP23), published in January 2023. <i>HTC: Reference to be added</i>
8.10	Wealden Green Infrastructure Study is subject to a review.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout.

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
		<i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>
8.13	'Opportunities for off-site biodiversity net gain may potentially present themselves through the diversification and remodelling of existing streets and spaces, introducing green infrastructure into these (see, for example, Projects PAS-01, PRG-01 and SGI-01), and through the diversification of existing green spaces which are currently little more than areas of mown grass (see, for example, Figure 27)'.	Here it is more related to general ecological enhancement than providing off site BNG compensation which would involve legal agreements on land or registering the site as a habitat bank. It is suggested this section is reframed as offsite BNG may not be applicable on streets. Make off-site biodiversity gains as a developer - GOV.UK <i>HTC: No change. HTC recognises that on-site delivery may not be possible (particularly as the emerging Local Plan establishes a very high requirement for 20% net gain) and is concerned that, if this is the case, gains may not be made in Hailsham. Scope does exist for improvements locally and these should be supported in the first instance.</i>
HaGI 1: Biodiversity Part 1	<p>'Other than where exempt by national guidance, proposals for development must secure a minimum biodiversity net gain of 10% '</p> <p>B 'within the Neighbourhood Plan Area' This does not comply with the legislation, in particular the Statutory Biodiversity Metric, which specifies LPAs and National Character Areas and does not consider the parish level.</p> <p>C- The process is already set out in legislation. Also, it refers to delivery in the Plan Area which goes beyond what the legislation states. It is also not clear if this refers to statutory credits or habitat bank units?</p>	<p>This part is not required. It is set out in national legislation. Also, we are proposing a higher amount of the BNG in the draft Wealden Local Plan, subject to supporting evidence.</p> <p>'Where possible' could be added at the end of the sentence to allow more flexibility.</p> <p>It is suggested that part c is removed.</p> <p><i>HTC: Wording 'where possible' to be added, along with reference to higher net gain requirement in the emerging Local Plan. Other text to remain as is for the reasons given in the supporting text, reducing the risk of net gain being directed elsewhere, or not being delivered at all.</i></p>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
HaGI 1: Biodiversity Part 5	Can some or all of this part be moved to the Design Guide and Code?	Move part 5 to the Design Guide and Code. <i>HTC: No change. These are important principles to embed into a policy, rather than simply saying that applicants 'should have regard to' (which would be the case if removed to the Code).</i>
HaGI 2: Access to green and blue infrastructure	Part 2 does not make sense as currently worded, and it is not clear what routes should connect or extend. Is it meant to refer to new routes connecting or extending existing routes?	Reword part 2 so that it is clearer. <i>HTC: The words 'walking and wheeling' to be added to this Part of the Policy text after 'conditions'.</i>
HaGI3: Diversifying and improving existing amenity green space	There is some duplication between this policy and HaCF6: Play and amenity space.	It is suggested that these two policies are combined. <i>HTC: Although closely related these policies cover different matters. HaCF6 is about new amenity space whereas HaGI3 is about existing spaces. No change.</i>
HaGI 3: Diversifying and improving existing amenity green space Part 1a	It is not clear what is meant by 'Diversifies existing green space provision' for HaGI3. Does this mean diversify the type of planting? Or the space size? Or its location?	It would help for this to be expanded upon to clarify what is expected and help with the implementation of this policy. <i>HTC: Text to be amended to refer to the provision of different green space typologies.</i>
8.26	The emerging Wealden Local Plan is subject to change.	Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout. <i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
8.28	The emerging Wealden Local Plan is subject to change.	<p>Update this paragraph following the publication of Regulation 19 Wealden Local Plan and ensure that these policies are referenced as 'draft' throughout.</p> <p><i>HTC: Reference to draft to be added. The NDP will be submitted (and potentially examined) before the Local Plan is submitted</i></p>
Figure 28	The potential allocation sites have changed between the Draft Wealden Local Plan (Regulation 18) consultation in March 2024 and the 'Focused' Draft Wealden Local Plan (Regulation 18) out for consultation (February 2026). This will likely change again prior to the Pre-Submission Wealden Local Plan (Regulation 19), rendering the map as inaccurate.	<p>It is suggested that the draft allocation sites and employment sites are removed from this plan.</p> <p><i>HTC: Caveat to be added to map to explain that these are subject to change. They remain important for context, help explain the pressure on land and wider growth aspirations established in the emerging WDC Local Plan, and thus why design guidance is required.</i></p>
HaGI5: Flood risk and sustainable drainage Part 1	'the design of should be'. This currently does not make sense as worded.	<p>Adjust the wording of the first sentence so that it makes sense.</p> <p><i>HTC: the word 'these' to be added after 'the design of'.</i></p>
HaGI5: Flood risk and sustainable drainage Parts 1 and 2	Parts 1 and 2 are largely about the design of SuDs and water tanks.	<p>It is suggested that these are moved to the Design Guide and Code.</p> <p><i>HTC: These are important policy considerations in an area subject to high flood risk and should thus be embedded in the NDP as opposed to being moved to the Design Code and where applicants will only have to 'have regard' to these aspects. Inclusion in the Policy strengthens the importance of this approach. No change.</i></p>

Part 2

Responses to comments on the Design Guide & Code

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
Foreword	<p>In the foreword it states that ‘subject to any future reorganisation of Council structures, parts of the Guide and Code, such as those in respect of well integrated residential development, variety and interest, may be relevant to future growth in Hellingly too.’ It is difficult to see how this would be the case, given that the Hailsham Design Guide and Code should only be based on the Hailsham Town Council designated neighbourhood area.</p> <p>Hellingly Parish Council are undertaking a review of its own NP and already have a Neighbourhood Plan in place.</p>	<p>This sentence should be removed.</p> <p><i>HTC: Sentence to be retained as the scale of growth that has taken place has effectively merged Hailsham with parts of Hellingly. Development is boundary-blind and good principles in respect of well-integrated development should apply irrespective of where located.</i></p>
Page 3, Figure 1	<p>As with the Neighbourhood Plan, it is recommended that on any mapping which contains the proposed housing allocations and employment sites, that these should be removed as these are still subject to change within the ‘Focused’ Wealden Local Plan (Regulation 18) published for consultation and the Pre-Submission Wealden Local Plan (Regulation 19) later in the calendar year.</p>	<p>It is recommended that the proposed housing allocation and employment sites are removed from the map.</p> <p><i>HTC: Caveat to be added to all mapping to explain that these are subject to change. They remain important for context, help explain the pressure on land and wider growth aspirations established in the emerging WDC Local Plan, and thus why design guidance is required.</i></p>
Page 5, final paragraph	<p>On page 5, final 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, Wealden District Council (WDC) does not use a Design Review Panel and have no plans to use one in the immediate future.</p>	<p>It is suggested that this paragraph is removed from the HDGC.</p> <p><i>HTC: Design Review is identified as a tool in the NPPF that LPAs should make use of. Wider design review services that operate outside of the LPA can be utilised. The aspiration for Design Review is established in the made Neighbourhood Plan and is carried forward. It is to be retained.</i></p>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
Page 7	Under the National Guidance, we also believe there are other heritage guidance documents that should be considered.	We suggest the inclusion of Historic England publication, 'Streets for All' and 'Streets for All: South East' <i>HTC: reference to documents to be added</i>
Page 8, final paragraph	The current 'Focused' Local Plan period is 20272042 (although the commencement date of the plan is subject to change, it is unlikely to at this stage).	The last paragraph on page 8 will need to be updated as a new Local Development Scheme (LDS) has been published. <i>HTC: Reference to status of Local Plan to be updated</i>
Page 12, Figure 7	The text refers to a number of key locations within the town, such as the High Street, Market Square and Market Street but there is no map with these locations labelled.	Provide an improved map to illustrate the locations referred to in the text including clear annotations and a key. <i>HTC: Labelled map to be added</i>
Page 13, Figure 8	A modern map to highlight the road system as is with road names would help with the interpretation of the older maps.	Provide a modern map with road names to compare with the older maps. <i>HTC: Labelled map to be added (combined with map prepared in response to comment above)</i>
Page 14, Figure 9	Figure 9 - It is recommended that on any mapping which contains the proposed housing allocations and employment sites, that these should be removed as these are still subject to change within the 'Focused' Wealden Local Plan (Regulation 18) published for consultation and the Pre-Submission Wealden Local Plan (Regulation 19) later in the calendar year.	It is recommended that the proposed housing allocation and employment sites are removed from the map. In addition, it may be helpful to have a more detailed extract of the town centre element as it is currently obscured by the public facility markers. Please also label the existing employment areas mentioned in the text. <i>HTC: Caveat to be added to mapping to explain that allocations are subject to change. Existing employment areas to be added to map.</i>
Page 14	The South Downs National	Please add an additional bullet point which mentions the South Downs

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	Park has not been mentioned as a key feature of the landscape setting.	National Park as a major landmark in the landscape to the south. <i>HTC: Additional bullet point to be added</i>
Page 15	<p>We are concerned that this is not in line with the text in the draft Conservation Area Character Appraisal document.</p> <p>Weatherboarding is not prevalent and neither is tile hanging. In addition, exposed timber frames are not common, and neither is thatch.</p>	<p>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'.</p> <p><i>HTC: This comment appears to conflate the Conservation Area with the town as a whole. This section of the Design Guide & Code is not just limited to the Conservation Area and includes cross reference to the town-wide Character Assessment previously prepared as part of the made Neighbourhood Plan. Reference to be added to the Conservation Area appraisal (e.g.: further information is set out in the Conservation Area Appraisal and which should be referred to). Reference to 'local vernacular' at start of section to be replaced with 'buildings' to help avoid confusion.</i></p>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
Page 16, Table 2	It is not just the setting of Listed Buildings which might be affected.	Table 2, central column, final bullet point - should be harmful to the setting of heritage assets. Not 'disturbs the setting of listed buildings'. <i>HTC: Wording to be amended</i>
Page 19	At the paragraph starting 'Hailsham is the largest settlement in the District'. We recommend that you should mention the presence of the South Downs National Park – as this is as important as the levels to the south and the High Weald to the north.	Amend wording accordingly. <i>HTC: Wording to be amended</i>
Page 21	What is meant by 'blank frontages' and where are these in the town centre? What is meant by a lack of coherence? Is this better described as connections? We are concerned that this page mixes the high street character and vernacular, with the surrounding residential character areas - the two are really quite distinct. Also, there is no mention of inappropriate materials such as weatherboarding.	Needs an explanation added. <i>HTC: The purpose of this section, as with the others in this part of the Design Guide & Code, is to provide an overview of the town as a whole and not to go into detail, as the comment would suggest. Text will be amended to explain there are some buildings in the town centre without doors and windows and thus have a blank frontage to the street. Reference to the lack of coherence is related to the previous sentence. The wording will be amended slightly.</i>
Page 22, Figure 17	Figure 17- It is recommended that on any mapping which contains the proposed housing allocations and employment sites, that these should be removed as these are still subject to change within the 'Focused' Wealden Local Plan (Regulation 18) published for consultation and the Pre-Submission Wealden Local Plan (Regulation 19) later in the calendar year.	It is recommended that the proposed housing allocation and employment sites are removed from the map. <i>HTC: Caveat to be added to mapping to explain that allocations are subject to change.</i>

Paragraph / Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation <i>HTC response in Italics</i>
Page 22	'Twitterns' is spelt incorrectly throughout the document.	Replace this with 'twittens'. <i>HTC: Typo to be amended</i>
Page 23, Figure 18	Figure 18- It is recommended that on any mapping which contains the proposed housing allocations and employment sites, that these should be removed as these are still subject to change within the 'Focused' Wealden Local Plan (Regulation 18) published for consultation and the Pre-Submission Wealden Local Plan (Regulation 19) later in the calendar year.	It is recommended that the proposed housing allocation and employment sites are removed from the map. <i>HTC: Caveat to be added to mapping to explain that allocations are subject to change.</i>
Page 27, Figure 23	Figure 23- It is recommended that on any mapping which contains the proposed housing allocations and employment sites, that these should be removed as these are still subject to change within the 'Focused' Wealden Local Plan (Regulation 18) published for consultation and the Pre-Submission Wealden Local Plan (Regulation 19) later in the calendar year.	It is recommended that the proposed housing allocation and employment sites are removed from the map. <i>HTC: Caveat to be added to mapping to explain that allocations are subject to change.</i>
Page 27 - Resources Section	Weatherboarding is not local to Hailsham. Neither are concrete tiles. Hailsham was a clay brickmaking area, so clay tiles are the local material.	Revise list of local materials to reflect this comment. <i>HTC: Text to be amended</i>
Page 28	Quality of public space - street furniture and signage are also important but not specifically mentioned. See 'Streets for All' mentioned in a comment box above.	Add this to text. <i>HTC: reference to be added to text to impact of poorly coordinated street furniture and signage, and street clutter in general, on the quality of the street environment.</i>

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Page 39, Objective 5	Fourth bullet point on roofspace - this should be subject to heritage constraints.	Add this to text. <i>HTC: Text to be amended</i>
Pages 40-41	Having a section here on part pedestrianisation of the High Street may be confusing for users as it is an aspiration. Whilst a design code or guide can set a design vision for the future it needs to be clear that it is just that. Please see page 57-59 of the Horam Design Guide.	It is recommended that the section on the pedestrianisation of the High Street is removed. It is already a project within the Neighbourhood Plan and it is not necessary to repeat here. <i>HTC: Section is to be retained as an important aspiration for the Town Centre and inclusion of which allows for principles to be established which could form the basis of any more detailed scheme to be taken forward. Removal of this would weaken the aspirations for change as clearly expressed through the consultation process.</i>
Page 42, Code HTC01	Part 6 – twitten is spelt incorrectly. Also historically, not all twittens had active frontages - see the route south from market square. Rope walks are also a traditional narrow path and more reference to the historic use of these in Hailsham could be made.	Consider comment and amend wording of part 6. <i>HTC: Typo to be amended and reference to be added to Ropewalks. Text to be amended to say that frontages should be created where appropriate (although in the core of the town centre, and given the opportunity for redevelopment and creation of sage, inclusive places, this is important)</i>
Page 43, First Paragraph	Rooms in the roof, or roof conversions with dormers/ rooflights are 'not' common in the conservation area.	Rephrase. <i>HTC: There is some evidence of this, including those in the images in Figure 38. However, end part of the sentence to be revised (i.e.: ...the presence of dormers in some buildings...)</i>
Page 44, Code HTC02	WDC disagree with upward extensions of buildings in the town centre as this would lead to conflicts, particularly with dominance of the church as the landmark focal point. WDC does not support the potential for upwards extension in Vicarage	Amend the blanket approach to upward extension recommended at part 6. <i>HTC: Text to be extended to explain that this is subject to the impact on views of the Church along the High Street</i>

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	Fields - this was a big sticking point in relation to the Hailsham Aspires project, particularly in considering the setting and context of the town centre and the historic environment.	
Page 46, Code HTC04	Balconies, Loggias and roof terraces are not characteristic of the town centre.	<p>Amend part 7 of Code HTC-04</p> <p><i>HTC: The text says these should be provided where appropriate and does not dictate that they will be necessary in all instances. The lack of balconies or similar in the town centre at the moment does not mean that they should not be provided in future. Indeed, there is a lack of residential development in the town centre, which perhaps explains the lack of this design feature. However, the provision of outdoor amenity space is important, particularly should opportunities for intensification come forward on previously developed land in the town centre. No change to be made.</i></p>
Page 49, Code HTC07	External shutters are not supported in conservation areas, whether perforated or not.	<p>Amend part 8 of Code HTC-07.</p> <p><i>HTC: Text to be amended</i></p>
Page 50, Code HTC08	HTC-08: Change and development in the Conservation Area- This reads more as policy than design guidance or coding. It also conflicts with some of the proceeding guidance / codes	<p>It is recommended that this is amended to just relate to design guidance. This could be incorporated in the NP as part of a policy and you could consider guidance/coding 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.</p> <p><i>HTC: This section was specifically inserted in response to comments on the earlier draft provided by WDC, and based on review of</i></p>

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		<p><i>examples supplied from elsewhere, and where the 'codes' in those documents are similar in length and content. The NDP does include reference to heritage assets in policy, but does not seek to duplicate national policy on this, and neither the NDP nor Design Guide & Code seek to repeat the information in the Conservation Area Appraisal. Rather, this is cross-referenced (as per Part 3 of Code HTC08 and the separate signposting section in the green shaded box), requiring applicants and decision-makers to consider this alongside the NDP and Code. The text of the Code is not considered to be in conflict with the Conservation Area. The position in the NDP and Code is that change and development can take place, but these should respond positively to the Conservation Area. This is clearly set out in the Code. No further change is required.</i></p>
Page 58, Code WEL02	WEL 02- Amenity Green Space. Part 1. This reads more as policy than design guidance or coding.	<p>It is suggested that this is amended to just relate to design guidance.</p> <p><i>HTC: Beyond Part 1 of the Code, which can be removed, all other aspects of this Code are considered to relate to design matters.</i></p>
Page 61	See comments above about local traditional material palette.	<p>Amend as detailed in comments on, page 27, resources section.</p> <p><i>HTC: See previous response</i></p>
Page 86, Code RET01	Sustainable drainage – the code 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.	<p>It is recommended that this 'Code' is amended to just relate to guidance on the design of SuDS only.</p> <p><i>HTC: It is considered that the text as drafted is focussed on SuDS. No further change required.</i></p>

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Page 88	There is a section on street greening but no actual clear guidance. It is not clear if the bullet points are guidelines/code? If they are guidance they should be in the appropriate coloured box.	Amend section if required. <i>HTC: The bullet point text should be read in the same way as all other sections in the document. It is only the coloured sections that comprise a Code or Signposting. In this section, and given the wealth of other guidance, it is not considered appropriate to include a specific code at this point. Signposting is instead provided.</i>



Neighbourhood Plan Consultation

**Report of Regulation 14 Consultation
Annex – Response to WDC Comments**

March 2026



**Hailsham Town Council
Inglenook, Market Street, Hailsham
East Sussex, BN27 2AE
01323 841702
www.hailsham-tc.gov.uk
enquiries@hailsham-tc.gov.uk**