

Wadhurst Neighbourhood Plan 2016 to 2039



Consultation Statement

Presented by Wadhurst Parish Council

April 2023

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1 INTRODUCTION

About this document

- 1.1. This Consultation Statement sets out the background of how the Wadhurst Neighbourhood Plan (WNP) 2016 to 2039 has been developed and provides, in accordance with regulation 15(2) of Neighbourhood Planning Regulations 2012:
 - details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - how they were consulted;
 - a summary of the main issues and concerns raised by the persons consulted; and
 - how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.
- 1.2. The WNP Steering Group (WNPSG) under the direction of Wadhurst Parish Council (WPC) has undertaken consultation activities with parishioners and statutory bodies. Stakeholder and business interested parties were also consulted to enable extensive engagement and involvement in the preparation of the WNP.
- 1.3. This WNP Consultation Statement sets out details of the events and activities carried out in the Parish and with the parishioners and key stakeholders.
- 1.4. All activities were carried out to ensure full inclusivity in the decision-making throughout the development of the plan.

The Wadhurst Neighbourhood Plan Steering Group (NPSG)

- 1.5. Wadhurst Parish Council (WPC) set up the WNPSG in September 2017 and it comprised three Parish Councillors and a further seven or eight parishioners.
- 1.6. This small but effective team was charged with the task of getting the WNP to the point of being ready to submit at Regulation 16 to Wealden District Council (WDC), supporting the independent examination and the public referendum. The group was fully constituted and given clear terms of reference.
- 1.7. The chairs and vice chairs of the group during the process were as follows:

Steering Group Chair/Vice Chair (Sep 2017 - May 2019) Chair Jonathon Bishop/Vice Chair Clive Parry.

Steering Group Chair/Vice Chair (May 2019 - Feb 2020) Chair Sue Bishop/Vice Chair Clive Parry.

Steering Group Chair/Vice Chair (Apr 2020 - to current) Chair David Connoley/Vice Chair Claire Moore.
- 1.8. Continuity was preserved throughout these Steering Group changes. Regular WNPSG meetings were held (normally every two weeks) and Progress Reports were submitted to the Parish Council regularly or when budget expenditure was requested. The Covid Pandemic lockdowns

from March 2020 to July 2021, and from December 2021 to January 2022, did mean that most WNPSG meetings in that period were held using Zoom videoconferencing.



Examples of the engagement activities - launch of the focus groups at an AirS briefing meeting (around Sept. 2018) to potential focus group members

2 SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES

High level summary of the engagement process

2.1. A high-level summary of the engagement and consultation activity is shown in Table 2.1.

Table 2.1: High level summary of the Plan process

Date	Milestone	Key activities
2017	Neighbourhood Area designated	<ul style="list-style-type: none"> WPC decide to prepare a neighbourhood plan. Steering Group established. Area designated to coincide with the Parish.
2018	Initial community engagement to publicise the plan and gain input	<ul style="list-style-type: none"> Launch of the WNP at the Commemoration Hall – Saturday pm 23 June 2018. Parish Fair – Uplands Community College – WNP Drop-in sessions – June 2018. Primary School Summer Fair – WNP Drop-in sessions – July 2018. Tidebrook Summer Fair – July 2018 and Tidebrook Drop-in sessions September 2018. Launch of the five resident Focus Groups at the Greyhound – Autumn 2018. Cousley Wood Community Event (held in Old Vine) – September 2018.
2019	Evidence gathering	<ul style="list-style-type: none"> Household Survey – March 2019. ‘What we all said’ community presentation at the Commemoration Hall – April 2019. Business Survey – May 2019.
2020 to 2021	Drafting the Plan	<ul style="list-style-type: none"> Pre-Submission plan drafted. SEA/HRA screening finalised. Regulation 14 (Phase 1) Pre-submission plan consultation and feedback survey – 17th June to 17th September 2021(extended due to summer holidays). Feedback considered, prompting professional health check of the WNP. Development of Wadhurst Design Code.
2022	Consultations	<ul style="list-style-type: none"> Regulation 14 (Phase 2) consultation to consult on changes since the first consultation.
2023	Finalising and making of the WNP	<ul style="list-style-type: none"> Submission Version Plan submitted to WDC. Regulation 16 Consultation. Examination. Parish referendum.

- 2.2. The sections below describe, in fuller detail, the engagement and consultation process which took place during the Plan's preparation. This is divided into five stages, with approximate dates provided:

Stage I: Engaging the local community to understand main issues (2018 to 2020)

Stage II: Developing and testing the emerging planning policies (2020 to 2021)

Stage III: The Regulation 14 (Phase 1) Pre-submission plan consultation (2021)

Stage IV: The Regulation 14 (Phase 2) Pre-submission plan consultation (2022 to 2023)

Stage V: Finalising the Submission (Regulation 16) Plan (2023)

Stage I: Engaging the local community to understand main issues (2017 to 2020)

- 2.3. The idea of undertaking the WNP project was first promoted at the May 2017 Annual Parish Assembly meeting. Several meetings of the emerging WNPSG followed in July to September 2017 and the formal go-ahead was agreed with WPC and WDC in September 2017. The neighbourhood area, coinciding with the parish boundary, was formally designated on 8 November 2017. The designation letter is shown in Appendix A.
- 2.4. The WNPSG spent time putting together an overarching project plan. In January 2018, they selected a logo for the WNP, which would be used on all material. At this early stage, Action in Rural Sussex (AirS) consultants were appointed to support WPC and the WNPSG, notably on the engagement and communications aspect of the WNP.



The WNP logo

- 2.5. An interactive session on the WNP project at the Annual Parish Assembly in May 2018 was followed by a public launch event for the WNP, held on 23 June 2018. This provided an opportunity for the community to learn more about what the WNP would be and to begin to gather initial ideas from parishioners about what they felt about the Parish. There was a visual display about the project and attendees were able to post initial thoughts and ideas using post-it notes.

- 2.6. The launch event turnout exceeded expectations with more than 260 members of the public attending, and a very high level of participation with approximately 1,400 written comments received.



Local event

- 2.7. Following the launch, the WNPSG focussed on engagement and evidence gathering, with the WNPSG concentrating on five particular topic areas:

- Getting Around
- Local Economy
- Environment
- Design, Development and Character
- Wellbeing and Leisure

- 2.8. Focus groups for each topic were established, drawing in wider members of the community. These met frequently and members were tasked with gathering information and local views relevant to their topic. Each produced a SWOT (Strengths, Weaknesses, Opportunities, Threats) analysis to help inform the priorities.





Examples of event publicity

- 2.9. The WNPSG had a presence at a series of local events, including the Tidebrook fair, the Primary School fair, the Commemoration Hall launch and the Wadhurst Country Fair. A display about the WNP was also established at the Station and using the village noticeboard. A website was set up, alongside social media accounts including Facebook and Twitter. Further activities included open days, surveys, and workshops. Visits to local parishioner organisations were undertaken to ensure that 'harder to reach groups' were also able to input. The NPSG also encouraged existing stakeholder organisations with interests in the Parish to reach out to their members, for instance the disability group.



Examples of the range of engagement activities undertaken by the group

- 2.10. A framework engagement plan document was put together to co-ordinate activities among the Focus Groups.
- 2.11. In August 2018, the group discussed the possibility of whether or not the WNP should seek to allocate sites for development. In light of the early stage of the then emerging WDC Local Plan, it was agreed that the WNP would not look to allocate at this time.
- 2.12. Towards the end of 2018, AirS hosted a Visioning Event with the groups and also prepared a State of the Parish Report, which set out key facts and figures about the Parish. They then assisted the Focus Groups in preparing questions for a [Household Survey](#) to go to all residents in March 2019.



Banner advertising the Household Survey

- 2.13. A total of 2,237 paper survey forms were distributed by post on the 1 March 2019 to reach each household in Wadhurst Parish from the 4 March 2019. The survey was also available to complete online. Residents were asked to complete and return their forms latest 22 March 2019. A total of 997 responses were received, of which 661 were returned by post and 336 completed online.
- 2.14. In parallel with the Household Survey, the WNPSG engaged with the Student Leadership Team at Uplands Academy to prepare and distribute a questionnaire aimed at teenagers in the Parish. Equally, primary school children were asked to write down what they like about the area and what could be improved.
- 2.15. A public meeting was arranged in April 2019 to give feedback to parishioners on the [Neighbourhood Plan Survey Report](#), prepared by AirS.
- 2.16. In June 2019, a separate online survey aimed at local businesses was launched by the local economy group. Meetings with individual businesses, including schools, and the Business Association took place to further gain input from this sector.
- 2.17. By September 2019, the draft vision for the WNP was agreed which, following revisions in 2019 and 2020 (as a result of community engagement), was finalised in 2021 as:
- Wadhurst Parish will continue to be a collection of friendly and vibrant distinct communities. The Parish will retain and support its rural 'village feel', historic character and heritage. Justifiable, sensitive and sustainable development will be supported whilst robustly protecting the High Weald Area of Outstanding Natural Beauty. The Parish economy and its popular High Street will be revitalised by improvements to the roads, traffic control, parking and active support of businesses. Sustainable ways of improving travel and leisure activities and facilities, which promote wellbeing, will be sought wherever possible.'*
- 2.18. It was also at this time that the WNPSG began to consider whether any significant local viewpoints in the Parish should be identified and safeguarded. A 'Views of Value' project was discussed, which would comprise a public exhibition and photographic competition for people to submit views they felt were important to them. This included a category for under 18s to ensure that the views of the younger demographic could be captured. The project was a joint venture between the WNPSG and Wadhurst Culture.
- 2.19. In January 2020, the Local Green Space project was launched. An initial desktop exercise was undertaken using local knowledge and feedback from the various surveys, meetings and events.

This would lead to a long-list of potential sites, which would each be carefully assessed against the National Planning Policy Framework (NPPF) criteria. A similar study of important local facilities was also planned following a similar methodology.

- 2.20. In early 2020, WDC officially withdrew its emerging Local Plan and the impact of this was discussed with WDC officers. A set of [Supplementary Questions and Answers](#) was documented for consideration by the WNPSG. It was agreed that the withdrawal of the Local Plan should not interfere with the progress of the WNP.
- 2.21. To ensure that the local community contributed to the Neighbourhood Plan preparation there were ongoing regular communications. This was achieved through regular updates on the WPC Public Notice Boards, via newsletters in the Parish Focus magazine, public posters and flyers, the website and social media.



- 2.22. **Character Assessment and Design Guide:** An important part of the WNP has been the development of locally specific design criteria to inform development proposals in Wadhurst Parish. The Design, Development and Character Group had, with the aid of additional volunteers, spent time assessing and photographing different parts of the Parish, to document their individual character. The work was further informed by the findings of the community engagement events and feedback.
- 2.23. A [Wadhurst Character Assessment](#) and [Wadhurst Design Code](#) were produced, although not fully finalised at this point.

Stage II: Developing and testing the emerging planning policies (2020-2021)

- 2.24. During 2020, and using the information gathered from the evidence and the community engagement, the WNPSG set out a series of Policy Intentions, with support from AirS, which were evolved into 35 draft planning policies. The draft policies were couched under the five Focus Area topics and included a range of policies for instance protecting dark skies, identifying green gaps, promoting high quality design, prioritising Brownfield sites in preference to Greenfield sites and promoting healthy lifestyles.
- 2.25. The draft policies were shared with WDC in order to seek early informal feedback. The feedback received suggested that the work needed to be more Wadhurst specific and identified areas where additional evidence and supporting maps would be required. There were comments too about the number (being too many) and scope of the proposed policies, some of which were considered to be outside what a neighbourhood plan can do.
- 2.26. Further work ensued, which involved filling evidence gaps and also reformatting the document into a more readable document. This work was undertaken in consultation with WDC officers, who provided feedback as more work was undertaken. There was a concern among the WNPSG members that comments received on the draft policies were seeking to 'water down' the effectiveness and protective nature of those policies. This led to a discussion in the group in February 2021 where a series of possible actions were voted on:
- i. Continue with the WNP, with increased justifications
 - ii. Continue with the WNP, with WDC major adjustments
 - iii. Continue with WNP, with some compromises
 - iv. Stop NP
- 2.27. The WNPSG agreed to number (i), i.e. continuing with the policies as crafted, but with an increased justification against each. Over the next few months, the Pre-submission Plan was finalised in readiness to take to consultation at Regulation 14.

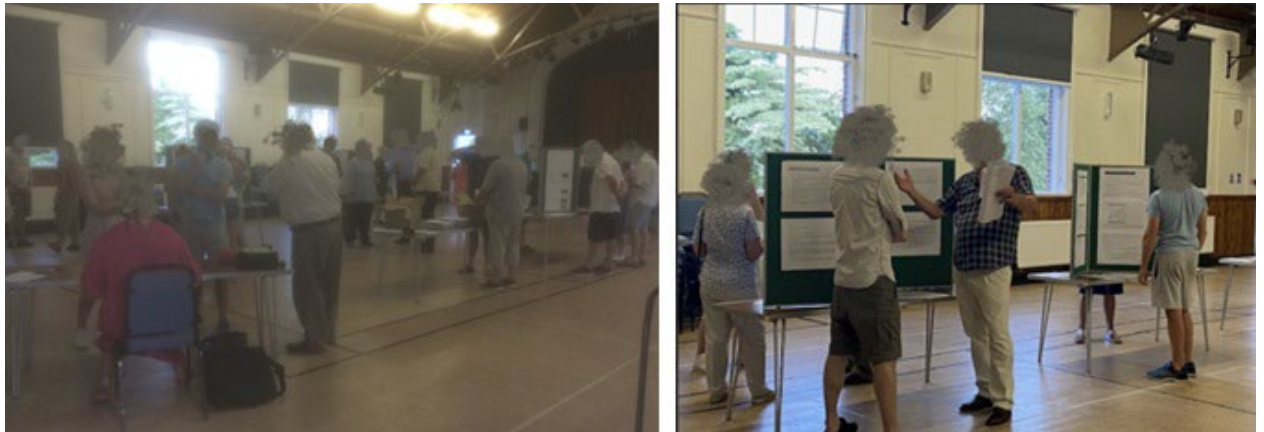
Stage III: The Regulation 14 (Phase 1) Pre-submission plan consultation (2021)

- 2.28. The Pre-Submission Plan was approved by WPC on 16 June 2021.
- 2.29. A Feedback Survey form relating to the key issues was developed to assist people in providing feedback. This had been piloted from 13-16 June by WPC Councillors and members of the WNPSG, to test and endorse the technology (using Google Forms). This collection period was included in the feedback statistics outcome. An electronic version of the Feedback Survey can be viewed at the following website address:
- https://docs.google.com/forms/d/e/1FAIpQLSeX8oyDxo2WRVJ4_F5ZGeBQjkeD09phZerP-nSRnLw-tOxXuA/viewform
- 2.30. Paper versions of the Feedback Survey were printed and made available at the public presentations (see para 2.34) and on request.
- 2.31. The Pre-Submission Plan and supporting evidence were formally published for public consultation for an initial eight-week period commencing 17 June 2021 and ending on 15 August

2021. Due to the Covid-19 pandemic, the WNPSG extended the feedback period to the end of September 2021.

2.32. Activities undertaken to consult with the community were:

- i. Digital copies of the Regulation 14 draft WNP and associated documents were available on the Parish website www.Wadhurst-pc.gov.uk and the dedicated WNP website www.wadhurstnp.org (noting this website has since been retired as of 2 November 2021 to save Parish funds). Hard copies of the Plan and Feedback Survey were available at the following locations: Wadhurst Village Information Centre (Carillon Cottage), Jempson's Supermarket (Post Office Area) and Wadhurst Library.
- ii. Two public presentations were held on 20 July 2021 and 28 July 2021 in the Wadhurst Commemoration Hall with over 150 residents attending. A summary of the WNP and the Feedback Survey (with links to the full Pre-Submission draft) were provided at the Public Presentations in July 2021 (c. 120 copies distributed).



Images from the Regulation 14 Phase 1 public presentations



Promoting the Regulation 14 consultation and handing out fliers / Feedback Surveys

- iii. Emails were sent to all the Neighbourhood Plan GDPR Google database of 372 contacts with a link to the documents on the website and an electronic copy of the feedback form. These were individuals who had expressed an interest in receiving information about the WNP.
- iv. Emails were sent to other contacts and stakeholders not on the GDPR WNP Google contacts database with a link to the documents on the website and an electronic copy of the feedback form. An email to James Preece at WDC from one of the WNP Steering Group members dated 28 June 2021 confirms that that emails were sent to circa 30 stakeholders and letters or emails sent to circa 15 landowners (this would include all Local Green Space owners, owners impacted by the proposed designated views and Green Gap owners)

Public Presentation of the draft WADHURST NEIGHBOURHOOD PLAN

Tuesday 20th July or Wednesday 28th July at 7.30pm in the Commemoration Hall, Wadhurst High Street.

The Wadhurst Neighbourhood Plan Steering Group and the Wadhurst Parish Council (WPC) would now like to share with Wadhurst Parish residents and stakeholders, the draft of the Wadhurst Neighbourhood Plan.

This process forms the Regulation 14 pre submission stage of the Neighbourhood Planning statutory process and allows resident / stakeholder to feedback to the Steering Group / WPC about the Plan.

Therefore please join us on the dates above for an informal review session of the draft Neighbourhood Plan.

Alternatively please complete the review of the draft Neighbourhood Plan Summary and associated feedback survey below (should take c. 15 minutes) by close of business on 15th August 2021.

Feel free to pass this notification to other members of your household or neighbours to complete their own review and feedback as well (the elderly or those without electronic devices may require your assistance).

Any additional comments not covered in the survey can be emailed to me at wadhurstnpp@gmail.com

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Here is the electronic link to the draft Neighbourhood Plan Summary and feedback survey:
<https://forms.gle/8KuNMapnLS6Y5QeS7>

(If you need to see the full policy descriptions then here is a link to the full draft Neighbourhood Plan (118 pages) or the draft Neighbourhood Plan can also be viewed on www.wadhurst-pc.gov.uk :
<https://drive.google.com/file/d/1RxCufZNTyVliADdjtPCPQdTnG49ZPFo9/view?usp=sharing>

Thanking you

David Connoley, Chair of the Wadhurst Neighbourhood Plan Steering Group

Copy of email sent to the local contacts on the database

- v. Emails were sent to the statutory consultees listed in Schedule 1 to The Neighbourhood Planning (General) Regulations 2012, and to appropriate consultees on a spreadsheet list provided by the planning officer at WDC. Further detail is provided at paragraph 2.37).

- vi. Articles were published in the Parish Focus Magazine in June, July and August 2021, with information about where to find the documents (online and in person).
- vii. Articles were placed in the Courier Local Newspaper, July 2021.



Examples of the Parish Magazine FOCUS and Courier Newspaper articles

- viii. Information flyers and a hard copy of the Feedback Survey were delivered to 1,350 addresses in the Parish by a company called JogPost. This covered the main built-up areas of the Parish. Information was delivered by Steering Group members to all addresses in the Parish in the rural areas outside these built-up areas, where they could gain access to a post-box (noting that many properties are behind locked gates). Information was also delivered to the Old Vine pub in Cousley Wood for people to pick up.

Name	Postcode	Name	Postcode
BALACLAVA LANE	TN5 6	PENDERS GREEN	TN5 6
BALDOCK ROAD	TN5 6	PEWTERS COTTAGES	TN5 6
BANKSIDE	TN5 6	SHANE VIEW	TN5 6
BASSETTS FORD	TN5 6	SHANE VIEW ROAD	TN5 6
BLACKSMITHS LANE	TN5 6	SIXTEEN BELLS	TN5 6
BOKING CLOSE	TN5 6	SHARPOUR GREEN	TN5 6
CASTLE WALK	TN5 6	SHARPOUR GREEN ROAD	TN5 6
CENTRAL PARADE	TN5 6	ST JAMES SQUARE	TN5 6
CHURCH STREET	TN5 6	SHARPOUR HILL	TN5 6
COCKMOUNT LANE	TN5 6	SHARPOUR ROAD	TN5 6
COURTHOPE AVENUE	TN5 6	SHARPOUR ROAD	TN5 6
COSSLY WOOD ROAD	TN5 6	SHARPOUR ROAD	TN5 6
DEEPDENE	TN5 6	SHARPOUR ROAD	TN5 6
DUNSTAN TERRACE	TN5 6	SHARPOUR ROAD	TN5 6
DURGATES	TN5 6	SHARPOUR ROAD	TN5 6
FAZAN COURT	TN5 6	SHARPOUR ROAD	TN5 6
FULLER CLOSE	TN5 6	SHARPOUR ROAD	TN5 6
GEORGE STREET	TN5 6	SHARPOUR ROAD	TN5 6
GLOUCESTER PLACE	TN5 6	SHARPOUR ROAD	TN5 6
GLOUCESTER ROAD	TN5 6	SHARPOUR ROAD	TN5 6
GORDENSHIELD	TN5 6	SHARPOUR ROAD	TN5 6
GREAT DURGATES CLOSE	TN5 6	SHARPOUR ROAD	TN5 6
GREEN SQUARE	TN5 6	SHARPOUR ROAD	TN5 6
GREYHOUND LANE	TN5 6	SHARPOUR ROAD	TN5 6
HIGH STREET	TN5 6	SHARPOUR ROAD	TN5 6
HIGHBURY PLACE	TN5 6	SHARPOUR ROAD	TN5 6
HOLLYBONE ROAD	TN5 6	SHARPOUR ROAD	TN5 6
HOLMSDALE CLOSE	TN5 6	SHARPOUR ROAD	TN5 6
JONAS DRIVE	TN5 6	SHARPOUR ROAD	TN5 6
JONAS LANE	TN5 6	SHARPOUR ROAD	TN5 6
KINGSLEY COURT	TN5 6	SHARPOUR ROAD	TN5 6
LITTLE PARK	TN5 6	SHARPOUR ROAD	TN5 6
LOWER CHURCH STREET	TN5 6	SHARPOUR ROAD	TN5 6
MAYFIELD PARK	TN5 6	SHARPOUR ROAD	TN5 6
MOUNT PLEASANT	TN5 6	SHARPOUR ROAD	TN5 6
OLD STATION ROAD	TN5 6	SHARPOUR ROAD	TN5 6
OSMERS HILL	TN5 6	SHARPOUR ROAD	TN5 6
PILL CLOSE	TN5 6	SHARPOUR ROAD	TN5 6
PILL GREEN	TN5 6	SHARPOUR ROAD	TN5 6
PILL HILL	TN5 6	SHARPOUR ROAD	TN5 6
PINDRILL PLACE	TN5 6	SHARPOUR ROAD	TN5 6

- ix. *Copy of delivery report from JogPost detailing which addresses they delivered to*
Information fliers with electronic links to the Pre-Submission Plan and informing residents about how to feed in their views were published (c. 500 leaflets)

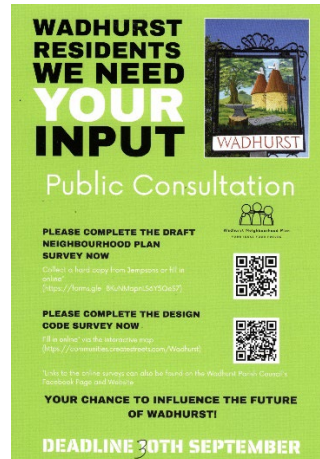


Image of the flier

- x. The consultation was advertised on the WNP Public Notice Boards in the High Street, using on street banners and posters within shops.



Photograph of local noticeboards, stands and posters advertising the Regulation 14 consultation

- xi. Multiple Social Media posts were posted with document links: Wadhurst Village, East Sussex Facebook Group - 3.3K followers, Wadhurst Together Facebook Group - 1.8K followers, Wadhurst Community Facebook Group - 2.8K followers, Save Wadhurst Village Facebook Group - 719 followers, Wadhurst Neighbourhood Plan Facebook Group – 33 followers
 - xii. A YouTube video was produced by the Brinkers Lane Action Group which also included a 'plug' for the Reg 14 draft WNP (950 views).
- 2.33. It should be noted that on 23 June 2021, the Steering Group also commenced a [Consultation](#) about developing a Design Code for the Parish. The aim was to understand what residents of the parish believed to be good developments, new and old alike. This would assist in developing codes that would help to benchmark future developments which are proposed in the Parish. The consultancy Create Streets was commissioned to prepare the Design Codes. The Codes

themselves were not finalised until after the Regulation 14 Phase I and therefore not consulted on. This is one of the reasons behind re-running the Regulation 14 consultation.

- 2.34. In terms of feedback from the local community on the Pre-Submission WNP, overall, 481 community surveys were returned (420 electronically and 61 manually). A summary of the results is provided in Appendix B.
- 2.35. 97% of respondents live or work in the Wadhurst Parish. There was a good spread of age groups responding with 23%, 54%, 21% responding from the 19-49, 50-69 and 70+ age groups respectively. Individual comments on the policy areas can be viewed in Appendix B.
- 2.36. Feedback from the community was extremely positive on the whole, with over 90% agreeing with the Vision Statement and over 90% agree with the Plan Aims. The WNPSG considered this to be a strong endorsement of the Plan. The main comments stemming from the community relating to the individual policies themselves can be summarised as follows:
- **General concern about the impacts of development on the landscape and environment:** multiple comments raising concerns about overdevelopment and the impact on the AONB, wildlife and biodiversity protection, water and air pollution and flooding. Local Green Space protections required (especially in Woods Green and Cousley Wood).
 - **Support for the need to ensure adequate infrastructure is in place:** Infrastructure is required to support development, climate change impacts, traffic congestion, protection of green spaces, loss of 'village feel', lack of education and healthcare facilities.
 - **Support for ways to reduce congestion:** Safe cycling is dependent on better roads (but roads are too narrow and too congested for cycle lanes). More High Street parking is required or better use of existing parking e.g. time restrictions. Impact on road safety / speed if congestion resolved / more speed limiting. Need to consider electric vehicles. Stop parking on pavements.
 - **Support for protecting local character and the identity of the settlements:** including the Green Gaps and character policy.
 - **Support for safeguarding open spaces and views:** Accessibility to more amenity space generally is required (e.g. there no formal public parks in Wadhurst). More distinctive and highly valued views to be protected (especially Cousley Wood). Views and potential Green Gaps in Cousley Wood and Woods Green may be considered for the Plan, although the WNPSG considered there is no major development threat because it would be unsustainable. The Windmill Lane, Cousley Wood view has since been included in the WNP.
 - **Support for the housing mix:** reflecting the need for affordable housing for the young (with a local connection).
- 2.37. In addition to consulting with the local community, the NPSG wrote to the statutory consultees and other organisations who might have an interest in the Plan. A list of the statutory consultees was provided to the Steering Group by WDC (James Preece, planning). The list can be found in Appendix C. Responses were received from the following organisations, with a summary of their comments provided. A full summary is included in Appendix B:
- **Wealden District Council** – detailed comments were received. Concerns were raised about a number of policies which were considered to be restricting development opportunities. The

format of the document was considered too complex. Includes amended wording and suggestions for removing text, where it was considered to be unjustified, overly onerous, duplicating or not supporting the principles of sustainable development. The WNPSG annotated the response with their feedback and this document is available in the Evidence Pack accompanying the Submission Plan.

- **East Sussex County Council** – comments received largely related to incorporating more strongly ‘health and wellbeing’ in to the vision, aims and policies themselves, strengthened wording and links to additional evidence documents.
 - **Historic England** – the response focussed on the heritage-related policies. The comments were largely supportive of the policies, with additional wording provided to enhance the policies in terms of effectiveness.
 - **National Highways** – comments to say that whilst they support the commitment of the Parish to sustainable development, due to no specific development sites, and corresponding dwelling numbers, being mentioned in the Wadhurst NP, they cannot make any specific recommendations regarding potential traffic impacts on the strategic route network.
 - **High Weald AONB Unit** – generally supportive of the policies and suggesting where additional evidence could be helpful to further justify policies. Also, where there is overlap and policies could be made more concise. Advised that green gaps exist to reduce the coalescence between settlements.
 - **Kent County Council** – suggested that the term ‘public rights of way’ is used as a generic term. Also made the point that Kent residents access Wadhurst, e.g. from Lamberhurst to Bewl, which is helpful to note for a number of policies, such as the Local Green Space policy.
 - **Environment Agency** – no specific comments but provided a checklist for neighbourhood planning groups to consider.
 - **Natural England** – no specific comments but provided a general advice note for neighbourhood planning groups.
 - **Southern Water** – commented on Policy PLE5 (Infrastructure support for businesses/ services/homes): Although the Parish Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system. This could be something to include in the WNP.
 - **South East Water** – commented that the Plan could include further reference to water efficiency, such as a target of 110 litres per person per day.
 - **Tunbridge Wells Borough Council** – Supportive of the designation of the Bewl Reservoir Recreation Area as a Local Green Space. Otherwise, general comments related to formatting and terminology.
- 2.38. In addition, representations were received from landowners including DMH Stallard on behalf of Land north of Mayfield Lane, and Kember Loudon Williams LLP on behalf of the Bewl Water Estate.

- 2.39. In parallel with the Regulation 14 consultation, WDC undertook a screening to ascertain whether the WNP would require a Strategic Environmental Assessment (SEA) and/or Habitats Regulations Assessment (HRA). A screening opinion was formulated and consulted on with the Environment Agency, Historic England and Natural England, who determined that the WNP was unlikely to have significant environmental impacts and therefore neither assessment would be required. The Screening Opinions dated July 2021 are available on the WDC website: [SEA Screening Opinion](#); [HRA Screening Opinion](#).

Stage IV: The Regulation 14 (Phase 2) Pre-submission plan and consultation (2021 to 2023)

- 2.40. Following on from the comments received at Regulation 14 (Phase 1), an amended version of the WNP was developed by the WNPSG. This was shared with WDC, who continued to raise concerns about various aspects of the policies and the general format of the plan. This led the WNPSG to seek a consultant to undertake a Health Check of the updated WNP, with a focus on providing advice on how to address the comments received from WDC. The Health Check was commenced in November 2021. An initial high-level appraisal of the document was prepared and this was discussed with the WNPSG. Following this, a fuller Health Check report was provided on 6 December 2021. These reports are available in the Evidence Pack.
- 2.41. The WNPSG used the recommendations of the Health Check to amend the WNP and this was again reviewed by the consultant. Further comments were submitted to the group, many of which were integrated into the document.
- 2.42. This iterative process of amending the WNP sought to reduce duplication, ensure that policies were focused on areas that can be influenced by planning policy, make the document accessible and easier to read, ensure conformity with strategic policy and further justify each policy with robust evidence. Whilst the content and scope of the WNP did not change significantly, the format and presentation of the policies was amended to consolidate the work. The Design Code that had been prepared in draft by Create Streets was finalised and brought into the Plan as a core part of the Plan to underpin the Design and Character policies. In addition, a new policy relating to Bewl Water reservoir area was introduced. Finally, additional evidence was gathered to underpin the Local Green Spaces, green gaps and local viewpoints policies.
- 2.43. The mapping for the WNP was also updated to provide more accurate portrayal of policies and associated boundaries. Finally, the WNPSG were made aware that certain policies as currently structured might fall outside the scope of the neighbourhood plan and some were therefore placed as Community Aspirations.
- 2.44. On sharing the renewed document with WDC for comment, WDC advised that in the context of the new policy and introduction of the Design Code, the WNP should be rescreened in relation to the need for an SEA/HRA. This rescreening took place during September and October 2022 with the Screening Determination Statements stating that neither an SEA nor HRA would be required. WDC advised, however, that a Sustainability Appraisal be developed to assess the impact of the WNP policies against social, environmental and economic factors. The updated Screening Opinions dated October 2022 are available on the Wadhurst Parish Council website: [SEA Screening Opinion](#); [HRA Screening Opinion](#).

- 2.45. A [Sustainability Appraisal](#), dated November 2022, was developed and can be found on the Wadhurst Parish Council website.
- 2.46. A renewed Regulation 14 consultation was held. The Regulation 14 (Phase 2) Pre-submission plan was put out for consultation from 14 November 2022 to 3 January 2023.
- 2.47. Activities undertaken to consult with the community were:
- Information about the consultation was provided on the Parish Council website.

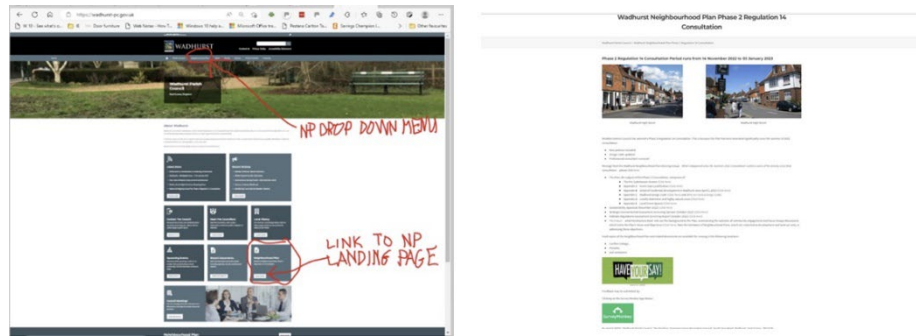


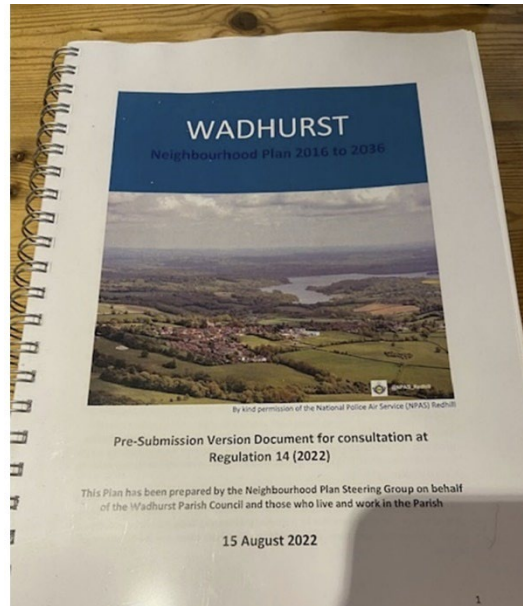
Image showing the Parish website with pages dedicated to the Regulation 14 (Phase II) consultation

- A Feedback Survey – in both electronic form and paper - was provided to aid input. A copy of this is provided in Appendix D.
- An article explaining the document and how to engage was placed in the December edition of the Focus Magazine.



Focus Magazine article, December 2022

- Hard copies of the document were placed in locations around the Parish.

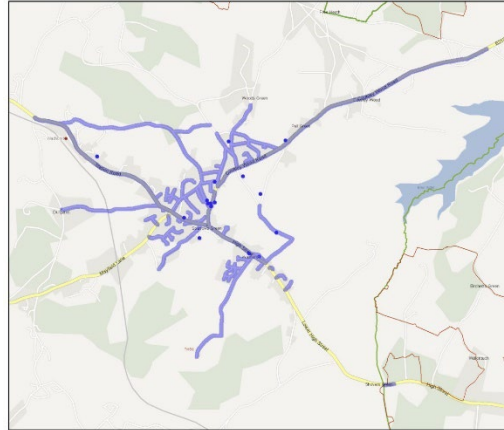


Hard copies of the WNP printed for viewing by parishioners

- v. A flier was prepared and printed, promoting the consultation and how to respond. 1,433 were delivered by JogPost to the built up areas of the parish. The remaining homes, where possible, were delivered by volunteers.



The flier prepared to promote the WNP consultation



Map of areas delivered to by JogPost

- vi. Posters promoting the consultation and how to get involved were displayed at locations around the Parish.



Example of posters and lamp-post banners promoting the consultation

- vii. The Steering Group hosted a stall at the Christmas Market in December, with copies of the document and information about how to provide feedback.



WNP stall at the Christmas Market, December 2022

- 2.48. In total, 34 responses from the local community were received. It is considered that the number was considerably lower due to the fact that the WNP had previously been consulted on and communications with the community had been ongoing during the amended drafting phase.
- 2.49. The statutory consultees were also written to with details of the WNP and supporting documents and evidence. A list of the statutory consultees written to is provided in Appendix E, using the detail provided by WDC.
- 2.50. Responses were received from WDC, East Sussex County Council, Southern Water, West Sussex County Council, the National Grid and Tunbridge Wells Borough Council. In addition, responses were received from four local landowners. Appendix F contains a summary of the responses received from the community, landowners and statutory consultees (excluding WDC) with responses from the WNPSG. Appendix G provides a copy of the response received from WDC with the WNPSG comments.
- 2.51. The following paragraphs provide a summary, by topic area, of the comments received during the Regulation 14 (Phase 2) Pre-submission plan consultation and how these were integrated into the Submission Plan.
- 2.52. General comments: The online survey provoked 34 responses from community members, who were asked to what extent they supported the individual policies and invited to submit any additional free text comments. A summary of the relative support for each policy is provided below and free text comments have been added to the overall summary table in Appendix F.

Policy number	Strongly Agree/ Agree	Policy number	Strongly Agree/ Agree	Policy number	Strongly Agree/ Agree
WAD1	89%	WAD8	94%	WAD15	94%
WAD2	86%	WAD9	97%	WAD16	89%
WAD3	88%	WAD10	94%	WAD17	97%
WAD4	88%	WAD11	80%	WAD18	91%
WAD5	97%	WAD12	97%		
WAD6	91%	WAD13	94%		
WAD7	91%	WAD14	94%		

Support for the policies taken from feedback from the local community consultation

- 2.53. The document was checked against the accessibility requirements to ensure that it complied with regulations. All maps were enlarged to improve readability. The conformity references were double checked and amended where required. WDC suggested removing the references to the High Weald AONB Management Plan objectives, but the WNPSG decided to retain these as it was considered helpful to decision makers in applying the policies.
- 2.54. The end date for the document was updated to coincide with the proposed end date for the emerging Local Plan. Information about the updated SEA and HRA screenings has been included alongside information about the Sustainability Appraisal.
- 2.55. Introduction: The section was slightly amended to reflect the purpose of the WNP in the context of the legislation.

- 2.56. About Wadhurst: The chapter has been slightly amended to ensure accuracy of information relating to designated areas in the Parish. The challenges and opportunities have highlighted the need to protect and improve health and wellbeing.
- 2.57. Vision and Objectives: These have been slightly amended to add additional clarity to the wording and to reflect specific comments raised during the consultation, for instance the inclusion of footpaths, bridleways and cycleways and health and safety.
- 2.58. Spatial Strategy: The WNP does not seek to allocate sites, as discussed in the document itself. A series of comments were received, largely from WDC, in relation to Policy WNP1 (Location of Development). Many of these assisted in adding greater clarity to the wording and have been incorporated.
- 2.59. A significant comment about the inclusion of green gaps was made. The two overarching concerns were that the strategic plan for WDC does not include green gaps in the parish and also that a perception that the green gaps identified were being used primarily to restrict development sites that had come forward via the SHELAA process. The WNPSG discussed these points in detail.
- 2.60. On the first point, the green gaps identified are considered to be the areas most vulnerable to the negative impacts of development, for instance in terms of coalescence of settlements and encroachment into the wider countryside. The adopted Local Plan already identifies certain such gaps in the district and, importantly, also suggests there are certain other settlements in the District where the open countryside separating them is particularly vulnerable to development pressures that would tend to erode their separate identities and their rural settings.
- 2.61. The Local Plan continues to state that such gaps are particularly sensitive, being visually exposed within the High Weald Area of Outstanding Natural Beauty. Previous planning policy has acknowledged the significance of these areas and it is considered that specific protection from development should continue to be expressed.
- 2.62. The identification of green gaps within Wadhurst Parish adds additional local detail to this strategic policy.
- 2.63. On the second point, the WNP has been in gestation for almost six years and the identification of the green gaps, which are considered to be most vulnerable from a coalescence, landscape and character perspective, were identified in advance of sites being submitted to the SHELAA and subsequent SHELAA review.
- 2.64. Housing: A comment was received about the inclusion of the potential housing mix table in the supporting text. This is provided as an example to aid developers and is not stipulated in the policy itself. Information about the application of First Homes has been included to reflect amendments to policy at the national level. Further guidance to assist developers in meeting the needs of older people, for instance on planning for dementia, has been included on the advice of East Sussex County Council.
- 2.65. Character, Heritage, Design and Sustainability: The title of this section has been expanded to reflect the suite of policies. Policy WAD3 (Design and Character of Development) was considered to be too long by WDC with detail included that duplicates the Design Code, which forms an integral part of the WNP. Whilst it is true to say that the policy is long, the WNPSG were minded

to retain the detail as they are concerned that such detail has been overlooked in previous planning decisions. The use of sub-headings within the policy is provided to aid readability and interpretation.

- 2.66. On the Design Code itself, WDC provided detailed commentary on this, which is included in Evidence Pack. Create Streets, the consultancy who prepared the Design Code, have updated the document, which forms Appendix B of the WNP. An explanatory letter addressed to WDC has been drafted by the WNPSG and a copy of this is included in Appendix H of this Consultation Statement.
- 2.67. A concern was raised about the inclusion of clause C within Policy WAD4 (Sustainability and Design). The WNPSG discussed this clause and, whilst community-scale renewable energy schemes might be acceptable, large scale schemes such as those detailed in the clause would be considered problematic in the High Weald AONB setting and the community have agreed with this premise.
- 2.68. Additional information has been provided to underpin Policy WAD5 (Conserving heritage assets) on the advice of WDC, notably the development of criteria against which potential non-designated heritage assets (NDHAs) might be identified. The criteria are based on guidance from Historic England and reflecting on the approach of other local authorities when it comes to classifying locally important heritage. The policy itself retains the two sets of NDHAs, which are considered to meet the criteria. The policy also retains the clause relating to heritage at risk, with additional detail provided in the justification text to set out that opportunities to monitor and improve local heritage should be sought by the Parish Council in partnership with Historic England, WDC and individual property owners.
- 2.69. Getting Around: Traffic and transport was raised consistently as a concern by the community throughout the plan development process. The policies in this section seek to address those areas that can be influenced through the planning system. The policies were largely welcomed and supported by consultees with amendments adding to the clarity of wording and easing of the application of the policies. ESCC in particular support the promotion of active travel and links have been made to the county-wide Local Cycle and Walking Infrastructure Plan.
- 2.70. Local Economy: The evidence quoted within the WNP has been updated to reflect the most recent reports prepared by WDC. Policy WAD10 (Employment retention and local economy viability) has been amended to bring into line with proposed WDC policy in relation to how long a property should be marketed before allowing a change of use. This serves to strengthen the policy. Further justification has been provided to Policy WAD11 (Supporting sustainable rural tourism), for instance to provide a more detailed description of what is meant by rural tourism.
- 2.71. The Environment: Comments were received in relation to Policy WAD14 (Bowl Water reservoir area and associated public activities) for instance regarding the public accessibility of the site and the resisting of support for overnight accommodation. The WNPSG considers that the Water Industry Act requires provision of access to the public to the site. Policy WAD14 is not designating “private land for non-profit community-based activities”. It is agreed that the site is a valued and important amenity/leisure/recreational space for everyone to enjoy and have access to, hence the reason to protect it, notably from an environmental perspective in the context of its location within the AONB and the flora and fauna that it provides a habitat for.

- 2.72. Additional information has been provided to Policy WAD15 (Protection of distinctive and highly valued views), for instance detail on the process of selecting the views identified and further information to justify the significance of each. Some of the views are individual while others form clusters and this been made clearer in the text.
- 2.73. Objections were received from the landowner whose site is crossed by Views 2a, 2b and 3. The WNPSG carefully reviewed these views in light of the comments received. Further information has been presented within the WNP about how the views were identified, in collaboration with the wider community. All views are viewable from publicly accessible locations. Additional justification text has been provided.
- 2.74. For Policy WAD16 (Local Green Spaces), each landowner was written to early in the process and again at the Regulation 14 (Phase 2) consultation. Certain proposed local green spaces received commentary (detailed in the Appendices) and the WNPSG response is set out below:
- 2.75. **LG7 (Ex Wadhurst College Recreation Field)** – WDC considered the site does not have recreational value. The land owner raised concerns.
- 2.76. This is the only sustainable recreation site for the new 41 executive homes and 17 apartments at the old Bellerbys college, located opposite (now Wadhurst Place). The field is now mainly used for informal recreation including for dog / recreational walking. It has historically been used for a wider range of recreational pursuits including lacrosse. For this reason, the WNPSG have retained inclusion of the site.
- 2.77. The landowner also raised concerns about the site as summarised below with the WNPSG response:

Concern raised by landowner	Response from WNPSG
The site is not in close proximity to the main settlement of Wadhurst.	The site is located amid the residential part of Mayfield Lane. It serves these residents, and also those living in the main village of Wadhurst, which is approximately 15-20 minutes walk from the space. As noted in the supporting justification, it is used by local brownie and guide groups and has a history of being used for sporting activities (notable lacrosse). The space is not considered to be remote from the community it is serving.
The residential properties located south of the site are adequately served by green space within that development.	There is green space within the residential area to the south, but that provision does not negate the importance of the Space LG7, which serves an additional set of purposes, as set out in the justification. Equally, site LG7 serves not only the residences to the south, but a broader set of needs from the wider community.
The site is not publicly accessible. It is used informally for dog-walking.	An LGS does not need to be publicly accessible. There is a history of informal use, not only by dogwalkers but others for

	informal recreation. The recreational use of the space is not the only reason for its inclusion, rather it is considered to meet other NPPF criteria beyond just recreation, that would make it 'demonstrably special'.
The site is not demonstrably special for wildlife purposes.	Wildlife: The WNPSG considers that the reasons provided in the justification adequately demonstrate how the space meets the NPPF criteria. An LGS does not have to be nationally designated as a wildlife space to be considered suitable for LGS designation. There is mature woodland and a pond on the site: ponds alone support two thirds of all freshwater species (Freshwater Habitats Trust). Part of the site is home to ancient woodland, which is recognised as an irreplaceable habitat.
The site is not demonstrably special for beauty purposes.	Beauty: The WNPSG considers that the reasons provided in the justification adequately demonstrate how the space meets the NPPF criteria. The space is the highest point in the parish and is informally visited as a point to view sunsets. It has not been included a specific view to safeguard because the access is informal.
The space is too large to be 'local in character' at 2.5 ha.	The Planning Practice Guidance does not define what is meant by 'local in character' in terms of size. There are many examples of LGSs in made NDPs that are larger than this space. The space has been considered in the context of: <i>whether it feels as though it is part of the local area? And why? How does it connect physically, visually and socially to the local area? What is your evidence?</i> The space is located close the residential areas of Mayfield Lane and within a 15-20 minute walk of Wadhurst Village. It is well-used informally both by individuals and organised groups (e.g. the brownies) and is well-connected to the movement route network, being located just north of the Mayfield Lane. As the highest point in the parish, it is well-known and noticeable and considered to be a feature of the wider village and parish.
The site is already protected from inappropriate development by way of its location in the High Weald AONB. Part of the site is ancient woodland.	The LGS designation would offer greater protection than is offered by way of being in the AONB, by raising the level of protection to that of Green Belt. As noted by the representative, the space has been

	considered in the early stages of the emerging local plan, therefore it would be wrong to suggest that the space is adequately safeguarded against loss. The loss of the space would be significant to the local community for the reasons provided. Whilst part of the space is home to ancient woodland, which is protected, the space is recognised as a whole piece, and it would be counter to local knowledge to redraw the boundaries to exclude the woodland, which forms an intrinsic part of the value of the space.
This is part of a wider site being considered as part of WDC's Direction of Travel Document and designating it as an LGS would preclude further consideration of that space.	The purpose of the LGS designation is to identify spaces that are demonstrably special to the local community. The current Local Plan was adopted prior to the introduction of LGS as a designation and the WNP is the first NDP document to be developed for the parish. Therefore it stands to reason that there will be a series of LGSs identified in the WNP that would not previously have been identified as such. The WDC emerging Local Plan is at a very early stage and is not adopted. Therefore it is not yet strategic policy.

- 2.78. **LG11/12 (Turner's Green Fields)** – WDC do not consider the sites to have significant historical value and are concerned that their inclusion is merely to stifle development.
- 2.79. The sites are considered to be demonstrably special to the local community from a historical perspective, which is one of the NPPF criteria. A number of articles and other evidence is cited in support of this and contained in the WNP Appendix. The sites were identified in advance of the SHELAA process and have also been identified as NDHAs in the WNP.
- 2.80. **LG13 (Bowl Water recreation area)** – Representations were received raising concerns about the size of the site, the location of the site being too far from the community and the fact that the site already has planning permission for 80 camping pitches for three years.
- 2.81. Size of the site: The site is approximately 13ha in size. The WNPSG do not consider that this is too large a tract of land to designate as an LGS. Government guidance on LGSs at [Open space, sports and recreation facilities, public rights of way and local green space - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space) states *"There are no hard and fast rules about how big a Local Green Space can be because places are different, and a degree of judgment will inevitably be needed."*
- 2.82. In addition, the CPRE undertook a review of 'made' neighbourhood plans to explore how communities have utilised the Local Green Space designation in their Neighbourhood Plans ([Local Green Space: a tool for people and nature's wellbeing](https://www.cpre.org.uk/publications/local-green-space-a-tool-for-people-and-nature-s-wellbeing)), which found the following:

“Analysis of this selection of LGSs revealed an average size of 1.8 hectares (ha) and a median size of 0.6ha. Sizes vary greatly across this selection, ranging from as much as 46.5ha to as little as 0.001ha (or 10 m²). This indicates that what constitutes an area of green space that is ‘not an extensive tract of land’ (see paragraph 102 of the NPPF) has remained relatively open to local interpretation.” (page 13)

- 2.83. In a rural parish, and in the context of the size of the whole of the Bewl site, the proposed LG13 at 13ha is not considered to be extensive. The SG consider that the CPRE Report and Analysis is strong evidence to refute a size challenge.
- 2.84. Close to the community it serves: In terms of being close to the community it serves, the proposed space is well used by those living in Wadhurst Parish. The rural nature of the parish means that residents will travel further than, for instance those living in more urban settings, to spaces that are special to them. Additionally, the space is only 2.5 miles from Lamberhurst which, whilst outside the neighbourhood area, represents an important user group for this particular space. This point was emphasised by TWBC in their response at the Regulation 14 (Phase 1) consultation, who were supportive of this space as a local green space.
- 2.85. Planning permission: Whilst there is a planning permission relating to the space for camping pitches, this is only temporary and for five months of the years. The permission is not considered to conflict with the local green space designation.
- 2.86. **LG16 (Stone Cross Farm Field)** – WDC raised concerns about whether the site could be considered demonstrably special.
- 2.87. The site has been identified by the community as being demonstrably special, particularly for recreational reasons. Since 2011 this field has been used (bar Covid and severe weather) to host the annual Parish Bonfire and Firework display by the Wadhurst Warriors Charity. The slopes are used for tobogganing on snow days. The site offers the first and only distinctive and highly valued views to the southern ridges as you enter Wadhurst from the B2099 (southeast). It is beautiful, tranquil and has a historic, well-used public footpath 27a (Snape 4) running through it, leading to Birchetts Wood and Forestry Commission Snape Wood. This footpath represents the one public access to these ancient woods without having to walk on pavement-less roads or take the car and is the only footpath able to be directly accessed from Wadhurst village High Street. This unique footpath is highly valued by the community and used for walking and bird watching.
- 2.88. Community Facilities: Concern was raised by WDC as to how the list of important community facilities noted in Policy WAD18 had been compiled. The WNPSG produced the list based on feedback from the community at the various engagement events that have taken place throughout the process. These facilities are considered to be the most important ones to retain from loss where possible.
- 2.89. Sustainability Appraisal: This has been reviewed and the WNPSG consider that the NPPF and PPG are reflected in the findings. The wording has been slightly amended to correspond to the Topic Areas from the Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Stage V: Finalising the Submission (Regulation 16) Plan (2023)

- 2.90. Following the changes made to the WNP as a result of the Regulation 14 consultations, the Submission Plan was formally submitted to WDC who, once satisfied that the correct set of documents have been received, will undertake the Regulation 16 consultation. It will then proceed to Examination and, assuming a favourable outcome, to referendum.

3 CONCLUSION

- 4.1. The WNPSG has undertaken a very thorough engagement programme in order to develop its Neighbourhood Plan. It has set out a comprehensive vision and objectives and guiding principles. In developing the policies to achieve the vision and objectives, the WNPSG has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 4.2. Feedback from the Regulation 14 consultations, notably from WDC, has been very detailed and this led to the WNPSG seeking an external review of the Plan. The resulting reports led the WNPSG to amend the Plan accordingly.
- 4.3. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Planning Regulations 2012.
- 4.4. Gratitude is extended to everybody who has contributed to the Plan's development, either as a valued member of the Steering Group or the Focus Groups, as well as to those who have taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the WNP.

Appendix A - Neighbourhood Plan Area Designation Letter

DECISION NO. IND 65/2017-PD

WEALDEN DISTRICT COUNCIL
Planning and Development Portfolio Holder DECISION

NAME OF DECISION MAKER	Councillor Ann Newton	DATE: 8 November 2017	
PORTFOLIO HOLDER	Planning and Development Portfolio Holder		
SUBJECT OF REPORT:	<div style="border: 1px solid black; padding: 5px;"> WADHURST PARISH COUNCIL: APPLICATION FOR DESIGNATION AS A NEIGHBOURHOOD AREA FOR THE PURPOSES OF PREPARATION OF A NEIGHBOURHOOD PLAN </div>		
DECISION MADE:	<div style="border: 1px solid black; padding: 5px;"> To approve the application submitted by Wadhurst Parish Council and designate formally the parish of Wadhurst as a Neighbourhood Area, for the purposes of Neighbourhood Planning. </div>		
REASONS FOR DECISION:	<div style="border: 1px solid black; padding: 5px;"> Wadhurst Parish Council, as a relevant body for the purposes of designation, has applied for designation of the whole Parish as a Neighbourhood Area under Section 61G of the Town and Country Planning Act 1990 (as amended). It is concluded appropriate to approve the application to designate the extent of Wadhurst Parish as a Neighbourhood Area. </div>		
OPTIONS CONSIDERED:	<div style="border: 1px solid black; padding: 5px;"> N/A </div>		
RESOURCE IMPLICATIONS:	<div style="border: 1px solid black; padding: 5px;"> The Local Planning Authority (LPA) has a duty to take decisions at key stages in the neighbourhood plan process and provide advice or assistance to a Parish Council that is producing a neighbourhood plan. Officers have attended an initial meeting with representatives of the Parish Council to discuss their ideas at the preliminary stages. The LPA will need to consider how best to resource future advice or assistance as the Wadhurst Neighbourhood Development Plan progresses. The level of advice or assistance will need to be considered against other Council / planning priorities. </div>		
Other Implications	<div style="border: 1px solid black; padding: 2px; display: inline-block;">Applies</div>	<div style="border: 1px solid black; padding: 2px; display: inline-block;">Other Implications</div>	<div style="border: 1px solid black; padding: 2px; display: inline-block;">Applies</div>
Legal	<div style="border: 1px solid black; padding: 2px; display: inline-block;">Yes</div>	Human Resources	<div style="border: 1px solid black; padding: 2px; display: inline-block;">Yes</div>
Human Rights	<div style="border: 1px solid black; padding: 2px; display: inline-block;">No</div>	Equalities and Diversity	<div style="border: 1px solid black; padding: 2px; display: inline-block;">No</div>

Crime and Disorder	<input type="text" value="No"/>	Consultation	<input type="text" value="Yes"/>
Environmental	<input type="text" value="Yes"/>	Access to Information	<input type="text" value="Yes"/>
Sustainability	<input type="text" value="Yes"/>	Exempt from Publication	<input type="text" value="No"/>
Risk Management	<input type="text" value="No"/>		
INTERESTS, AND NATURE OF INTERESTS DECLARED AND ANY DISPENSATIONS:	<input type="text" value="N/A"/>		

SIGNED:

Councillor Ann Newton
(Planning and Development Portfolio Holder)

DATE OF PUBLICATION: 8 November 2017

FINAL DATE FOR CALL-IN: 15 November 2017

DATE OF IMPLEMENTATION: 16 November 2017
(if not called in)

Appendix B - Regulation 14 (Phase 1) Survey Feedback Results from the community and statutory consultees

Community Feedback - Regulation 14 Draft Plan Feedback Statistics (results dated 21-09-16)

The charts below provide an overview of how strongly the community supported the various themes of the Plan.

This is followed by a table of detailed comments received and responses from the Steering Group.

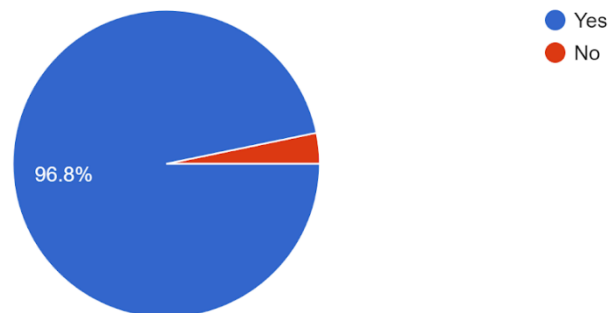
Note: although we show the raw statistics here it is likely that the 'Yes' % or 'Strongly Agree' are much higher and 'Strongly Disagree' much lower because if the respondents have a comment to make they are not registered as 'Strongly Agree' but as 'Strongly Disagree'. However, when reviewing the comments, many are pro 'Yes' / 'Strongly Agree' and just wanted to reinforce their opinion by making a comment.

In the pie charts the c.20 respondents of the soft launch are shown separately ('Yes' = orange) and should be amalgamated with the blue 'Yes' segment. Similarly the two '70+' and '70 and over' designations age groups should be amalgamated.

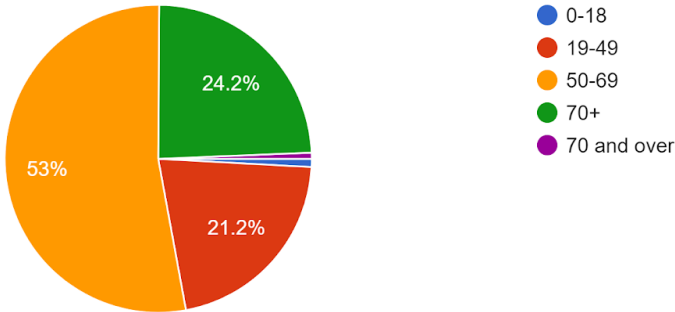
Where split % are shown below these represent the 'Strongly Agree' 5 group and 'Agree' 4 group on the scale 1-5 (1 = Strongly Disagree).

Do you live or work or study or own land in Wadhurst Parish ?

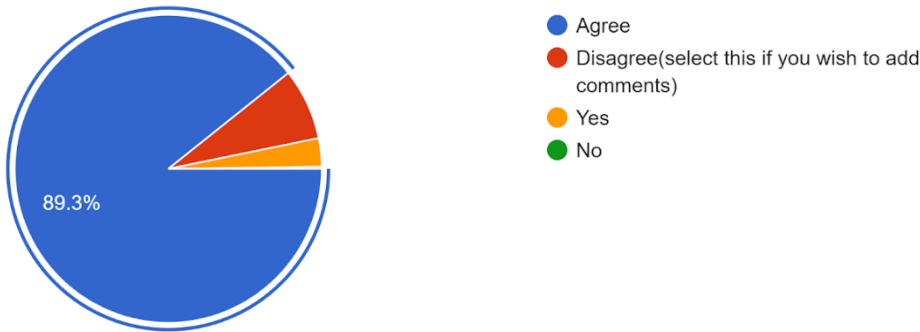
463 responses



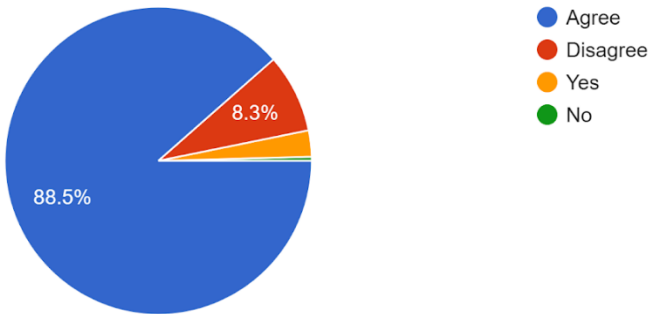
Your age range
466 responses



Do you agree or disagree with this Vision ?
467 responses

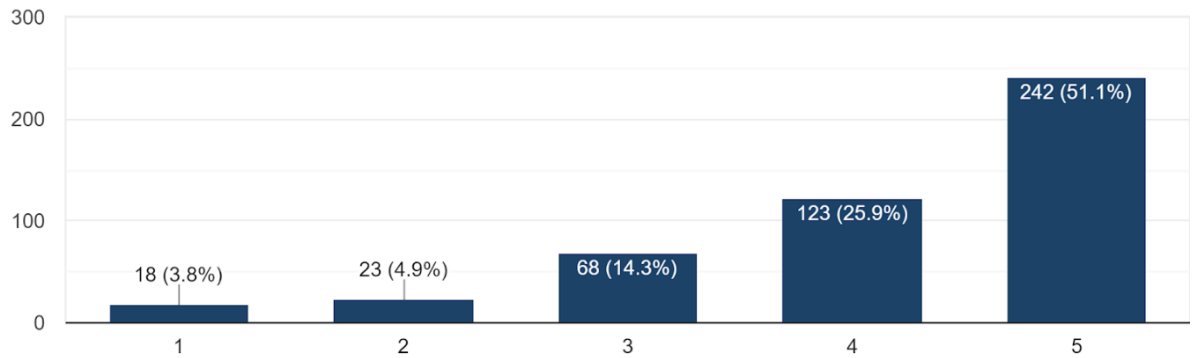


Do you agree or disagree with these Aims ?
471 responses



Do you agree or disagree traffic congestion in the Wadhurst High Street or Wadhurst Parish generally is impacting your quality of life ?

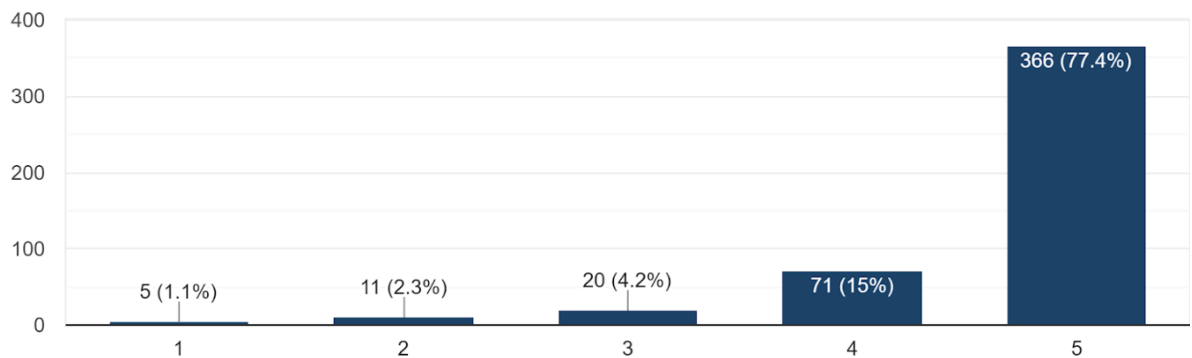
474 responses



If the respondent was a non-driver it is unlikely that they would have voted for 'Agree' or Strongly Agree'

Do you agree or disagree there is frequent traffic congestion in the Wadhurst High Street ?

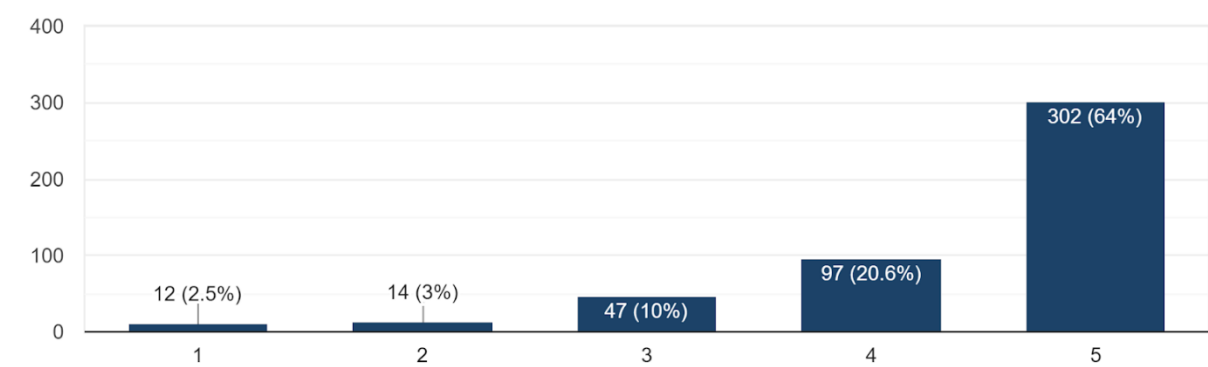
473 responses



If the respondent was a non-driver it is unlikely that they would have voted for 'Agree' or Strongly Agree'

Do you agree or disagree there is a parking problem in the Wadhurst High Street or Wadhurst Parish generally ?

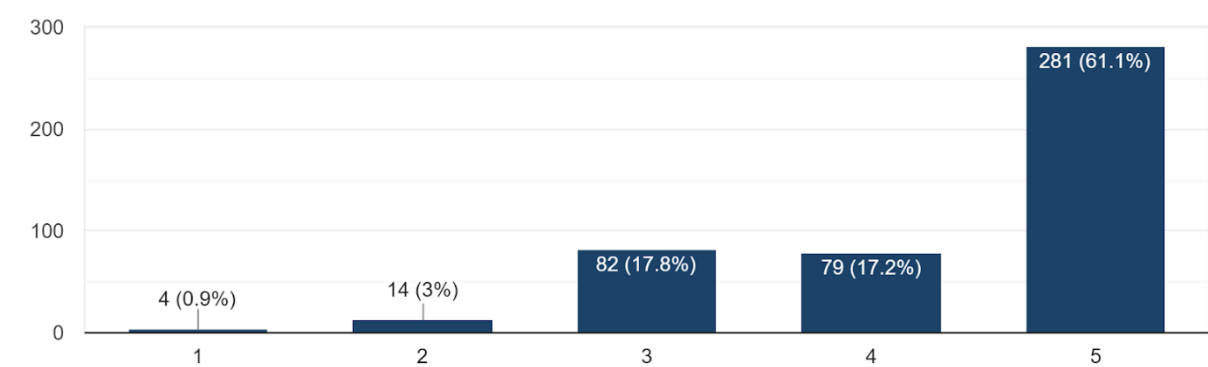
472 responses



If the respondent was a non-driver it is unlikely that they would have voted for 'Agree' or Strongly Agree'

Do you agree or disagree there is a current capacity problem with NHS GP health services in Wadhurst Parish ?

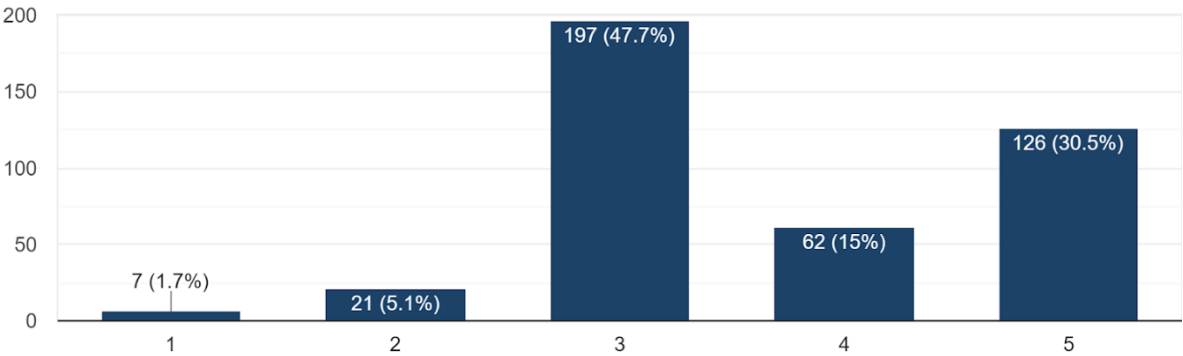
460 responses



If someone had not been ill recently, it is unlikely they would have voted 'Agree' or 'Strongly Agree'

Do you agree or disagree there is a current capacity problem with Nursery or Primary Schools in Wadhurst ?

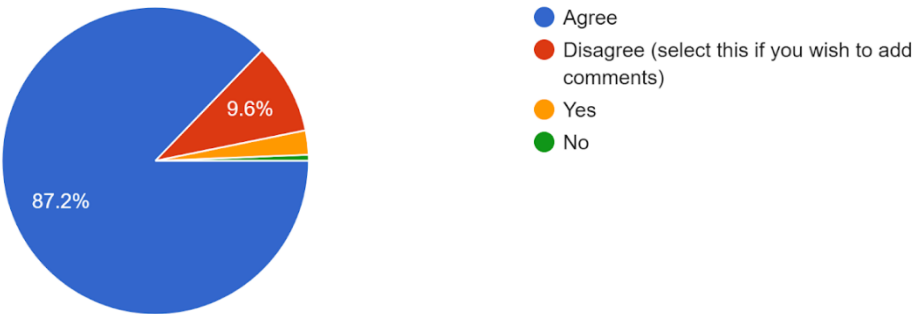
413 responses



If a respondent did not have children of nursery or primary school age it is unlikely that they would have voted for 'Agree' or 'Strongly Agree'. Instead they would have probably voted '3' (Even though the Survey instructions said if the question is not relevant then skip the question)

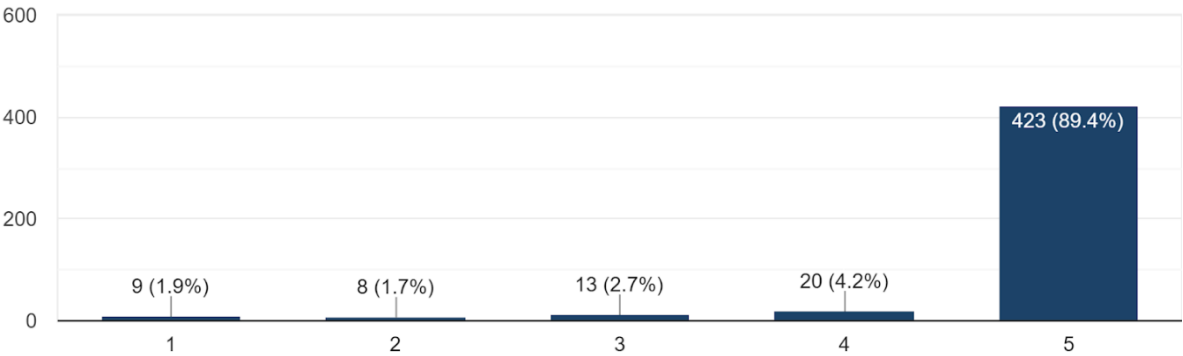
Do you agree or disagree with the NP selection of Objectives and Policies above ?

470 responses



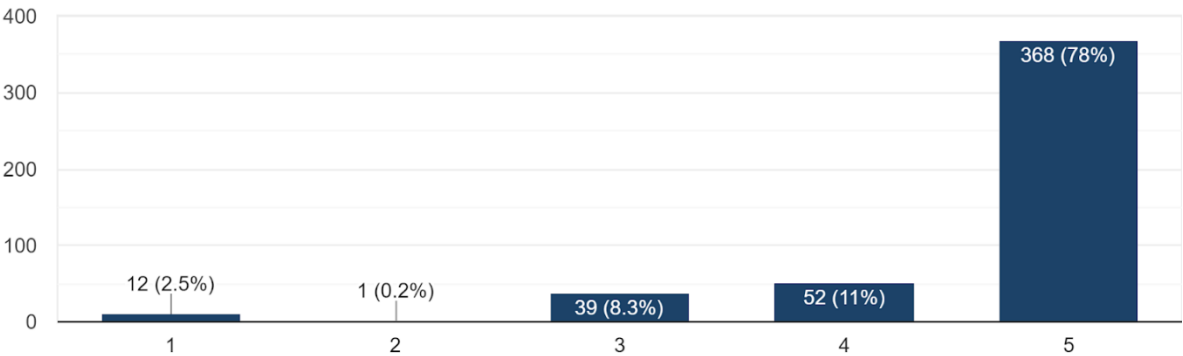
Do you agree or disagree there should be no ‘major’ development (i.e. 10 or more houses) on High Weald AONB / Greenfield sites?

473 responses



Do you agree or disagree that housing developments on existing developed (Brownfield) sites would be preferable ?

472 responses



Wadhurst Neighbourhood Plan – Detailed comments received from residents at Pre-Submission (Regulation 14) Phase I Consultation and proposed responses from the Steering Group

Comments are listed by paragraph number / policy, the Ref refers to the respondent number, with a summary of the comments. The fourth column provides a commentary from the Steering Group to indicate how the comment was taken on board and how this has been reflected in the next version (Regulation 14 Phase II) of the Plan.

Note that the Phase I version of the WNP that these comments refers to dates June 2021 and can be found in the Evidence Pack. The policy numbering is different to the policy numbering in the Regulation 14 Phase II version.

Ref.	Section	Summary of comments	Commentary from Steering Group
1.	Vision	“Retaining Rural Village feel” is incompatible with granting permissions for large numbers of houses on beautiful AONB green fields. So either one or the other has to be chosen, you can’t have both. Similarly “Revitalising improvements to roads, parking etc. is empty talk. Where are the outline proposals for more car parks, restricted High Street Parking to ease the hold ups and jams OR can the possibility of a By-pass be resurrected?	Noted. The WNP is not allocating sites. Strategic site allocations are outside the scope of the NDP in terms of stopping them. The WNP can only influence development in order to retain those aspects of the parish that are important locally.
2.	Vision	Add/rewrite HSE ie health, safety and environment objectives	Noted.
3.	Vision	Disagree with the word ROBUSTLY	Noted.
4.	Vision	friendly, sustainable and ... economy, including its support of local businesses promote health, well-being and	Noted.
5.	Vision	Further housing development in Wadhurst would not be justifiable, the school cannot take more pupils as surrounding areas are also being developed, there is not enough parking in the village to support more people visiting the high street, you cannot travel through the High Street easily and at school drop off time you need to allow 30 mins to drive the length of the High Street which is ridiculous, more development = more traffic = more chaos	See Ref 1.

Ref.	Section	Summary of comments	Commentary from Steering Group
6.	Vision	I agree to these ideals, but you state you will robustly protect areas of HWAONB but planning ref. WD/2021/1285/MAO has been submitted on protected land??? How is this protecting the rural character of Wadhurst and HWAONB?? Also 'except in exceptional circumstances' seems to be missing on this survey?? This planning application is even outside the permitted development boundary for Wadhurst Parish?	See Rep 1.
7.	Vision	I agree with supporting the local businesses and the general message put forward, but I am concerned by potential plans to sort out the traffic. Traffic islands, such as in Lamberhurst would be detrimental to the High Street and where would additional parking go? My greatest concern is the increased pressure of future development on the traffic and services, not to mention the appalling, un wanted destruction of the green field sites if they proposed developments would be allowed to go ahead.	Noted.
8.	Vision	I am uncomfortable with the phrase 'distinct communities' as expressed here. It sounds fragmented. I would hope the vision for Wadhurst Parish could be for a single community embracing people with diverse backgrounds and outlooks living in areas having their own distinctive character. Semantics perhaps but conveying a different meaning.	Noted. The vision has been amended.
9.	Vision	I don't believe any form of development over a dozen houses should be allowed in Wadhurst or the directly surrounding area. The infrastructure doesn't exist to sustain it. We also have a duty to protect the local wildlife not to mention we are in close proximity to Bewl Water which is a national water source and protecting the environment and making sure we don't increase pollution by overbuildubg should be a top priority in	See ref 1. The plan has a policy to promote biodiversity.

Ref.	Section	Summary of comments	Commentary from Steering Group
		<p>this area.</p> <p>There is plenty of undeveloped land elsewhere that doesn't not have a reservoir within a couple of miles.</p>	
10.	Vision	<p>I don't believe any form of development over a dozen houses should be allowed in Wadhurst or the directly surrounding area. The infrastructure doesn't exist to sustain it.</p> <p>We also have a duty to protect the local wildlife not to mention we are in close proximity to Bewl Water which is a national water source and protecting the environment and making sure we don't increase pollution by overbuildubg should be a top priority in this area.</p> <p>There is plenty of undeveloped land elsewhere that doesn't not have a reservoir within a couple of miles.</p>	Noted. See Rep 1.
11.	Vision	<p>Sustainable ways of improving travel and leisure activities and facilities, which promote well-being, will be sought wherever possible</p> <p>I'd like to see this a priority for wellbeing but also importantly for reducing carbon footprint and environmental impact. Eg we should think about cycle lanes, additional al footpaths etc</p>	<p>Noted. The policies have been designed to promote sustainable development.</p> <p>This is included in the plan in terms of promoting active travel.</p>
12.	Vision	If improving village parking means building a double deck car park at The Greyhound ("like they have at Tonbridge and Sevenoaks stations") then it's a no from me. Also as long as WDC doesn't have a five year housing land supply any Neighbourhood Plan is frankly worthless.	Noted.
13.	Vision	In any new developments the focus will be on mitigating and adapting to climate change through energy-efficient housing, preservation of green spaces, and encouragement of local employment.	Noted – a policy is included on supporting sustainable design.

Ref.	Section	Summary of comments	Commentary from Steering Group
14.	Vision	In view of the current climate emergency all development proposals should be expected to be able to demonstrate a negative or at least a zero impact on global warming	
15.	Vision	It is not clear here what is meant by "Justifiable, sensitive and sustainable development".	Noted – the plan has been reviewed to make it clearer.
16.	Vision	Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes. They should also be able to choose where they Do NOT want new homes. At present residents feel powerless to object to arbitrary development of homes that are being proposed on farmland, green belt etc with no regard for capacity of local infrastructure. This is totally wrong.	Noted. See Ref 1.
17.	Vision	No further development needed as infrastructure not available or obtainable to support.	See Ref 1.
18.	Vision	No giving up of land for housing as we will lose the "village " feel.	See Ref 1.
19.	Vision	Of course, I agree with the sentiments but would like to see 'robustly protect HWAONB' be replaced by 'will ban building on HWAONB'	See Ref 1.
20.	Vision	only agree with some parts	Noted.
21.	Vision	Please include traffic considerations in the plan. Once that is done the plan becomes unviable.	Noted. Traffic is largely outside the scope of the NDP as it is responsibility of ESCC. The Plan does support opportunities for active travel.
22.	Vision	Promote, pursue and initiate sustainable environmentally friendly ways to LIVE in and around Wadhurst	Noted.
23.	Vision	Seems rather nebulous. I also dislike the fact that I have to comment on one section before I can see the next!	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
24.	Vision	The infrastructure of the village cannot sustain any further development . It will NOT retain its ' village like atmosphere ' if it's continually built upon and the resources are not here to support more houses / people / traffic .	See Ref 1.
25.	Vision	The vision states, and I quote, that "The Parish will retain its rural 'village feel', historic character and heritage. Justifiable, sensitive and sustainable development will be supported whilst robustly protecting the High Weald Area of Outstanding Natural Beauty (HWAONB)", and yet all the while there are current developments already underway within the Parish that clearly do NOT meet the "justifiable, sensitive and sustainable development" criteria; current planned developments also fall outside the scope of this statement.	See Ref 1.
26.	Vision	There should be more emphasis on promoting walking, cycling and shared transportation as an alternative to the use of cars. We need less vehicle traffic in the village, but more people.	Noted – this as been included in the Plan at WAD7.
27.	Vision	To defend the AONB any development must be within the village.	Noted – this is the remit of policy WAD1 as recrafted.
28.	Vision	Traffic congestion and parking are big issues for the village. In view of the government changes to the Highway code (https://www.gov.uk/government/consultations/review-of-the-highway-code-to-improve-road-safety-for-cyclists-pedestrians-and-horse-riders/outcome/government-response-to-the-review-of-the-highway-code) this is the perfect opportunity to create a different vision for the future of Wadhurst which involves less cars rather than trying to accommodate more in our already saturated infrastructure. We need to factor in the advent of electric and autonomous vehicles and the use of Zipcar or similar, which will reduce the need for car ownership or a second car. Cycle paths through the	Noted. A policy is being included on Mitigating traffic congestion at key stress points.

Ref.	Section	Summary of comments	Commentary from Steering Group
		<p>village and a shuttle vehicle running throughout the day would help reduce the need for using a car.</p> <p>All new build housing applications should be assessed for their carbon footprint - solar panels, ground source heat pumps vs gas central heating etc.</p> <p>Green spaces, wildlife areas, tree planting for shade and porous road surfaces should all play their part in any future plans.</p> <p>Wadhurst could set a precedent and be a flagship village showing how to preserve it's historic identity and protect it for the future in a sustainable way. By preserving our vital green spaces and enhancing them we can protect the village from unsustainable development,</p> <p>It will create a better environment for everyone .</p>	
29.	Vision	We cannot improve the traffic through the village as it is and there is not enough parking in the village centre as it is	Noted.
30.	Vision	What are the definitions for justifiable and sustainable?	The plan is being amended to provide greater clarity.
31.	Vision	With the coming of automated vehicles we will not need more parking. This will be here before any decision will be made on a new car park. It would a gross waste of resources to create more car parking.	Noted.
32.	Vision	you only care about the council tax the council gets from new homes in an area where roads that are fixed are only the ones on view. there are plans to build new hospitals or doctor surgery's all i can see is a bran new crematorium. the village can't take anymore traffic.	Noted.
33.	Vision	Your vision is too ambiguous and wooly. It is essentially written to preserve the status quo and reject any development within Wadhurst. We live in an AONB, therefore any proposal for any development will by its nature have an impact on the AONB. The only thing that wouldn't is no	Noted. The V & O have been reviewed in light of all comments received.

Ref.	Section	Summary of comments	Commentary from Steering Group
		development. What is justifiable? What is sensitive? Who defines these?	
34.	Aims	<p>I agree to these ideals, I repeat, you state you will robustly protect areas of HWAONB but planning ref. WD/2021/1285/MAO has been submitted on protected land??? How is this protecting the rural character of Wadhurst and HWAONB?? Also 'except in exceptional circumstances' seems to be missing on this survey?? This planning application is even outside the permitted development boundary for Wadhurst Parish?</p> <p>Also how is the building of 4 and 5 bedroom expensive executive homes helping.</p> <p>Many of our local residents require 1,2 or 3 bedroom affordable housing to get on to the housing ladder, very few of these types of houses are built by the developers because the don't bring enough ££££££'s</p>	See Ref 1. Policy WAD2 has been worded to address local housing need.
35.		<p>1. I have seen no evidence of any improvements to the village infrastructure.</p> <p>2. As previously stated, two of the key aims of the plan are, and I quote, is to "retain its rural 'village feel', historic character and heritage. Justifiable, sensitive and sustainable development will be supported whilst robustly protecting the High Weald Area of Outstanding Natural Beauty (HWAONB)", and yet all the while there are current developments already underway within the Parish that clearly do NOT meet the "justifiable, sensitive and sustainable development" criteria; current planned developments also fall outside the scope of this statement.</p>	See Ref 1
36.		<p>4. There is enough housing to go around if anymore is build it should be restricted to East Sussex residents only. People moving in from the city are plaguing our small parish.</p>	See Ref 1

Ref.	Section	Summary of comments	Commentary from Steering Group
37.		4. There is enough housing to go around if anymore is build it should be restricted to East Sussex residents only. People moving in from the city are plaguing our small parish.	See Ref 1
38.		4. to provide high-quality housing for residents through justified, sensitive and sustainable development; No it has to stop. The balance and quality of life will be irreparably destroyed by shortsighted and detached planning decisions. This village is not 'designed' to manage any extra development. Take it from me, I've known Wadhurst since 1960 as a resident and this burden will only accommodate the property developers who will not have to experience the 'destruction' they leave behind. It has to stop.	See Ref 1
39.		4. to provide high-quality housing for residents through justified, sensitive and sustainable development; Unfortunately it seems that this term is meaningless as huge areas of farmland is being lined up for developers to impose homes that are not affordable to most and will alter the character of the Wadhurst area beyond repair.	See Ref 1.
40.		Again, "justified, sensitive and sustainable development" is undefined and subjective.	Noted and reviewed for next Plan version.
41.		Change the order of the aims - my primary concern is to protect the AONB and rural character of Wadhurst	Noted. The Aims have been simplified in the new Plan version by amalgamating them into one set of vision and objectives.
42.		Do not agree with the wording of 4	Noted.
43.		extend = sustain character, and heritage	Noted.
44.		Housing development should be restricted to limited affordable housing that supports the shelter and economic needs of the local community	See Ref 1
45.		I agree with four of the points, but the idea of sustainable development is not clearly explained.	Noted- this is addressed in the next version

Ref.	Section	Summary of comments	Commentary from Steering Group
		What does this actually mean? At present it is too vague and could provide a loop hole for developers.	
46.		I agree with the aims but would extend aim no.4 to include a commitment to rented affordable housing. At present I believe it can be included in planning applications but later dropped if the developers think they will lose money.	Noted.
47.		I agree with these points where they fundamentally need to be addressed- which is open to discretion.	Noted.
48.		I am not in favour of cycle lanes on existing roads as they are already extremely narrow, and the cycle lanes would have a seriously deleterious effect on congestion	Noted, although the plan does seek to promote active travel, particularly for shorter journeys as this is more sustainable and will help to relieve traffic congestion.
49.		I do agree with those aims. I just think it's very important that the rural character of the area is maintained, presumably that's why most moved or continue to live here. That being said, I wouldn't want the community to die, I love that it's so vibrant	Noted.
50.		I do not agree with no.4. The High Street in Wadhurst is not fit for the purpose of driving as it is, more development and more cars would be an absolute nightmare unless you are planning to build a large car park and empty the high street of parked cars so traffic, buses, school coaches, lorries etc. can pass each other	Noted.
51.		I do not agree with the need to provide employment in the village unless it is a by-product of other improvements in for example school or doctor surgery. I would not like the parish to encourage businesses to come to the village for the sake of creating jobs as this is likely to lead to areas such as the one the secret cellar is or the area around faircrouch.	Noted. The plan focusses on retaining existing businesses and supporting rural tourism.
52.		I feel there should be some specific inclusion of environmental issues as well.	Noted.
53.		I think Point 4 should read: "to provide only high-quality housing for residents through justified, sensitive and sustainable development which	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
		maintains and enhances the rural village-feel of Wadhurst;	
54.		Infrastructure improvements principally to the road network, must precede any more residential development and therefore must be given priority.	Noted, although this is outside the scope of the WNP.
55.		It won't be affordable housing and this in aonb	Recrafted policy WAD2 seeks to influence the type, size and affordability of housing in the Parish
56.		No further development needed as infrastructure not available or obtainable to support	See Ref 1
57.		No more houses being built, no parking zones in the bottlenecks in the high street to relieve congestion.	See Ref 1
58.		no need for more building or houses	See Ref 1
59.		not number 4	Noted.
60.		Point 4 is not defined	Noted.
61.		Re. 4. I hope the phrase "High Quality Housing refers to the building quality and not to expensive executive style rather than lower cost homes for first time buyers. We need help to buy schemes etc.	Noted. Recrafted policy WAD2 seeks to influence the type, size and affordability of housing in the Parish
62.		Sustainable development must not include building on AONB and greenfield sites that must be protected for current and future generations to enjoy. If development needs to take place, it must be in areas where the impact to inhabitants of the village is minimal, particularly where that development would have a very direct impact of the quality of life for residents, or the value/saleability of their homes. People who are lucky enough to live in a historic village must only ever view themselves as custodians of their houses and the settlement itself and must do everything they can to preserve it. If we build over the footpaths and fields that generations have enjoyed for years, and destroy the character of historic homes by putting them on the edge of housing estates - it would be an unforgivable mistake.	See Ref 1.
63.		The aims are fine. But you're saying that you want to retain rural feel. Rural means no development. So	See Ref 1.

Ref.	Section	Summary of comments	Commentary from Steering Group
		how on earth are you marrying the two together? Your vision and objectives have a huge get out clause in it which mitigate the delivery of any of the aims.	
64.		The existing infrastructure is creaking at the moment. The roads are taking too long to repair and are repaired cheaply and insufficiently. The doctors surgery is too small and it takes too long to get an appointment. So where is the capacity to build more homes? Furthermore who decides what is “justified, sensitive and justifiable development”? No doubt not the people who live here.	See Ref 1.
65.		the government has greatly increased its housing target for our area which is incompatible with an AONB. So a 'justified' development needs to be defined and should not include meeting a government target	See Ref 1.
66.		The village can not sustain further housing development without improvements in education and healthcare facilities in particular	See Ref 1.
67.		To ensure that no development is permitted within the parish which adversely impacts on global warming	See Ref 1.
68.		To maintain the distinct character of each village constituting 'wadhurst', protect the green space in and around wadhurst, protect heritage and prevent conurbation.	Noted – there are number of policies included that seek to achieve this.
69.		To provide high quality affordable housing. There should be an emphasis on affordable.	Recrafted policy WAD2 seeks to influence the type, size and affordability of housing in the Parish
70.		We cannot sustain more houses unless substantial investment is made to infrastructure.	See Ref 1.
71.		We simply do not want any more development.	See Ref 1
72.	Parking	Again, I broadly agree, and have no major objection to eg road widening but I would rather not see more traffic accommodated but rather existing traffic better managed - keeping the neighbourhood attractive is	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
		important but I don't think the outcome of this should be to try to grow it exponentially	
73.		By new development for parking would this be on a current brown site? The car park next to the school would be adequate if Uplands Students in upper and lower 6th didn't use it. Either the school should provide parking for them or they should use public transport. In the school holidays the car park is fine to use, the school needs to take responsibility for this problem as it affects businesses in Wad.	Noted.
74.		create safer and more pedestrian and cycle friendly access to the train station and centre of village, including dedicate cycle parking facilities and cycle routes.	Noted – this is included within recrafted Policy WAD7.
75.		Cycle lanes are not a priority over sorting traffic flow and safety. Priority is more parking space	Noted.
76.		Cycle paths are not needed the roads are suitable for cycling. Congestion in Wadhurst makes the village safer for pedestrians using the village. Parking just needs to be enforced in main car park to stop people parking in there all day- more short stay bays needed e.g 1-2 hrs. There is too much all day parking which is used by students and teachers at Uplands. Uplands should provide better parking for their students.	Noted. Parking enforcement outside WNP scope.
77.		GA3 Cycling should only be encouraged and accommodated within the 30mph zone (which in itself should be extended to all roads in the parish).	Noted.
78.		Getting around the village is pretty safe and easy. Maybe add a zebra crossing outside jempsons. I don't think parking is really an issue, I've never seen the big car park behind the greyhound full up in the 18 months I've lived here. Traffic isn't really an issue either, occasionally there may be a short queue to get through the village but it lasts minutes. I lived in Dartford before and it would often take an hour or more to drive across the town if the tunnel was closed, so if people think 3 cars in a line is heavy	Noted – this would be responsibility of ESCC as Highways Authority.

Ref.	Section	Summary of comments	Commentary from Steering Group
		traffic then they need to leave the village occasionally! 😊	
79.		I agree with all except cycle routes.	Noted. The plan is supporting active travel.
80.		I am in agreement with most of these measures. However, the development of extra car parking would require very careful consideration.	Noted.
81.		I am not in favour of cycle lanes on existing roads as the roads are already narrow, and there is congestion. Reducing the width of the road by a cycle lane would make congestion considerably worse	Noted.
82.		I believe it would be prudent to include a point about aims to reduce speed in this section.	Outside WNP scope.
83.		I disagree with any proposal to widen the High Street as this will only result in faster traffic making it more difficult for pedestrians to cross the road.	Noted. This is not included in the WNP.
84.		I don't understand PGA3 and PGA4. I think on-street parking should be kept to a minimum except for disabled residents. All new developments should include adequate off-road parking (and take account of any projected increases in car ownership). More car parking provision should be provided for businesses, shop workers and schools (The parking and traffic generated by staff/parents at Uplands, Wadhurst Primary School and Sacred Heart cause significant problems along the High Street and the quiet side roads)	Noted – the parking policy has been consolidated to protect existing parking and support new, where it can alleviate high street areas and Sparrows Green Road.
85.		I have noticed and have started to cycle more myself and do agree that cycle lanes would be a great idea. I do disagree on the parking. We can always park in Wadhurst and with mindful developments in the NP, extra parking shouldn't be needed.	As above.
86.		I see some people using bicycles for leisure/exercise but hardly anyone seems to be on a bicycle to get from A to B with any other purpose. Therefore I am not keen to see cyclist routes taking up space in the roads. It seems like a waste of resources to me rather like the several invalid parking spaces in the main	Noted. The plan is supporting active travel.

Ref.	Section	Summary of comments	Commentary from Steering Group
		Wadhurst car park which never get used! Likewise why talk about putting in more pavements when you don't look after the ones we have. Here in Mayfield Lane we have a pavement on one side of the road which is cracked and uneven and completely covered in leaves in the autumn/winter and at night there is insufficient light to see where you are going. I agree with more off road parking, but on road parking is part of the existing problem especially as there are buses and large lorries trying to get down the High Street.	
87.		I would like to see added mention of speeding traffic which is an issue coming out of the congested areas.	Outside scope of WNP.
88.		If we seek to promote/ease traffic flow, Wadhurst will just get more traffic. The main road through Wadhurst is heavily used by traffic from Tunbridge Wells as an alternative to the A21 which gets heavily congested at Kippings Cross. I suggest traffic calming/slowing measures would be more beneficial to discourage use of the main road as a through route, including a 20mph speed limit. plus Dutch style cycle friendly road/cycle paths.	Outside scope of WNP policy.
89.		Improved traffic flow would result in more and faster traffic. Better to further restrict traffic flow to discourage through traffic.	Noted.
90.		Make cycle paths	Noted - The plan is supporting active travel.
91.		New development parking may be important, but I disagree with new development on green field sites, and question where brownfield site parking would fit in. Otherwise I agree.	See Ref 1.
92.		No cycle paths - not enough room. Few bikes anyway !	Noted although the plan is supporting active travel.
93.		Not really sure what you're trying to say to be honest ...some of this seems misleading.	Noted.
94.		Only agree with GA4 - the others solve a problem that does not exist	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
95.		Only encourage more cyclists if the roads have better surfaces. Know a cyclist who was killed because of potholes	Noted.
96.		Parking restrictions will affect the village character and make Wadhurst less inviting. Issue of cycle routes ?	Noted.
97.		PGA3 Unclear what the intent is. To reduce High Street congestion may need to reduce on-street parking, so need to increae the off-street parking - so what is the policy ? Also, should we not try and decrease the need for parking in Wadhurst by increasing travel modes ? so link GA1 and GA2	This has been made clearer in consolidated policy WAD9.
98.		PGA3: On-Street Parking, Off-Street Parking and New Development Parking. No. NO new development and NO New Development Parking. It again only accommodates the property developers.	See Ref 1.
99.		PGA-4 Of the strong opinion that if traffic improvement measures are implemented within the high street then traffic flow speeds would increase significantly giving rise to increased safety issues for pedestrians and cyclists; of which there are few presently but would potentially increase if measures in GA-1 & GA-2 were successful. A bi pass for the village is highly unlikely and would need to comprise of both east/West & north/south components.	Noted but outside WNP scope.
100.		Policies do not seem to address the Objectives e.g. which Policy covers GA1 and GA2 which are more than just safety - should include sustainability / environmental impact, health and well-being etc PGA3 - not clear on intent as covers potential conflicting requirements (e.g. off / on street) ? 'Ensure sustainable integrated parking solutions to support aims of plan.'	Noted – this has been reviewed in the amended version of the WNP.
101.		Proposal GA4, PGA3 and PGA4 are problematic. Congestion is good ! Although it may at time be	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
		frustrating, it slows the traffic and so helps preserve the accessibility of the shops, safety of pedestrians etc. It is not possible to remove all bottlenecks from the High Street so a 20mph limit is redundant. Additional parking just outside the central area would be helpful, however.	
102.		so called congestion has positive safety outcomes	Noted.
103.		The congestion is frequent throughout the day. Worst times are when students are bussed in/out of Uplands Community College. Cement mixers and other large vehicles cause major hold ups. Even refuse lorries cause chaos and tractors. They can use the A21.	Noted.
104.		<p>The simple truth is we live in the countryside so will always rely on our own transport ie cars - trying to change this is foolhardy. The best thing to do is encourage ev and hybrid vehicles rather than look at cycle routes, which will create more congestion or improving public transport, that no one will use anyway.</p> <p>As a resident living off the highest Reeth I would like to see more resident only parking as sometimes it can be very difficult to park and you end up being a part of the congestion problem on the high street because there has been no where provided for us to park.</p>	Noted, however the plan is supporting active travel.
105.		The traffic at the moment is to be expected, it's sometimes annoying, but for the most part ok. I feel like the questions are misleading: traffic WILL be a problem if developments go ahead. Therefore ask the question you want to ask: With new development do you think traffic will be an issue,? the answer is of course yes.	See Ref 1.
106.		There is an easy solution to the congestion problem in the high street, have parking only on one side. This has been proposed by county highways previously but opposed by the shop owners who park on the high street.....	Noted – this is outside WNP scope.

Ref.	Section	Summary of comments	Commentary from Steering Group
107.		There should be no cycle lanes in or around Wadhurst (other than those that are already present). Trying to keep the rural country village effect will not be possible when you start implementing cycle lanes as if we live in some sort of town	The plan is supporting active travel.
108.		There should be speed restrictions of a least 40mph on roads entering the village on B2099 between Shrovers Green and Wadhurst High Street. It is a dangerous stretch of road and there have been several car accidents one requiring the air ambulance.	Outside WNP scope.
109.		This is all very well, but I cannot see how widening the High St and creating new pavements etc can be achievable without carving up an awful lot of land.	Noted.
110.		We have to stop parking on pavement, especially Lower High Street. I'd also recommend no parking at all on the High Street - for two 60 mins periods every school day at drop off and pick up times - in between the fire station and The Greyhound.	Noted but outside scope of WNP.
111.		Where would you build these car parks and what would you do with all the cars which are parked on the high street and what do you propose to do to actually make the traffic flow. The current car parks are mostly full, if the cars parked on the high street were to park there, there would be no parking at all.	The WNP supports additional parking provision to address congestion in part. Sites would need to come forward through the planning system and would be considered on a case by case basis.
112.		Why isn't this being done already? The footpath to the station, for example, is in a disgraceful state, and in winter particularly is actually dangerous in parts	Noted.
113.		Worthy aims but undeliverable with more housing.	See Ref 1.
114.		you cannot put so many points and ask one question about agree or disagree! congestion and parking is much less of a problem than it is made out to be. The mode of transport is changing and it will be a revolution.	Noted.
115.	Congestion	Although I agree in principle with supporting local businesses and the self employed I think the plan needs to strike a balance. It is difficult to say that on	The plan is supporting existing businesses and rural tourism. Census data shows that we have a high number of

Ref.	Section	Summary of comments	Commentary from Steering Group
		the one hand we have a traffic and parking problem, but on the other hand we dont want to enocourage businesses which are going to attract more traffic and parking. Support for sustainable and appropriate businesses is OK. Over commercialisation of the high street could also alter the feel of Wadhurst and is not. Any business development should be for the benefit of residents rather than attract more people.	homeworkers. The policies are considered unlikely to result in high numbers of additional cars from businesses.
116.		Businesses are for entrepreneurs, infrastructure generally is for government. Obviously the 2 should talk but public money used directly for business is not good use of resources.	Noted.
117.		crossed out tourism support	Noted, although sustainable tourism is a key activity in the Parish and the WNP supports this where it can be undertaken sympathetically to the community and the environment.
118.		Doesn't seem inclusive of existing businesses outside the High Street ? - aspire to reduce its traffic pollution - Wadhurst Parish - protecting the High Weald AONB	The policy has been widened to include all Parish businesses.
119.		I agree that tourism and amenities for residents be supported. However it is important that the area does not get over commercialised.	Noted.
120.		I agree with: The protection of existing businesses and promotion of the high street. The support of sustainable tourism. The promotion of high quality communications to support those who can work from home and work in sustainable ways. I disagree with:	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
		The development of new business premises in areas that will negatively impact the lives of residents and destroy the character of the village.	Noted – the policy seeks to direct any new development predominantly within the existing settlement boundaries.
121.		I live in the next village to Wadhurst, but I avoid shopping there, I avoid picking my family up from Wadhurst station because I never know how long it will take me to get through the high street, if you want to increase footfall you need to sort out the traffic and parking	Noted.
122.		In your plan you propose knocking down Piccalo cafe, making Ben Grieg into housing, how is that encouraging business development. No new proposal for more business sites. The shops in Wadhurst are too small to be properly sustainable. We need to them to be able to expand or develop a second High street. I can normally park when I go to the high street, even when it is a problem I walk a shorter distance than if i went to Tunbridge Wells or Crowborough and the parking is free here unlike TW.	This has been removed from the Plan.
123.		Keen to keep buying local but we should limit the main High Street to (say) three takeaways, this is to maintain the character of village feel and not to become only busy in the evening as some others have.	Noted but outside influence of the WNP.
124.		LE4 & PLE4: Low end tourism such as Camp sites/ glamping and caravans (all of which are well provided for in the area) will bring more traffic and noise but without a commensurate increase in jobs or other economic benefit to the area	Noted. Policy WAD11 has been reviewed to address this point.
125.		LE6 is a contradiction to the policy of trying to restrict yet more traffic on the high street and surrounding area as regulation 13.	Noted – these policies have been consolidated.
126.		On the face of it the proposals sound good, but let's look at the recent history of Wadhurst. When I first moved here there were banks, a wet fish shop, a greengrocers, a haberdashers and a bakery. Now all we have are coffee shops opening everywhere and	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
		barbers. This is a very new development so where was the planning here when we needed it? Why is it going to get any better? To encourage people to come here we need niche businesses where people will come here because they can't get specialist products anywhere else.	
127.		PLE4 is inadequate to prevent new-build tourist accommodation in the AONB countryside	Noted. Policy WAD11 has been reviewed to address this point.
128.		PLE4: Tourism. The more unattractive developments there are, the lower the tourism footfall. LE6: To support and promote the availability of high-quality leading-edge communications and other (transport, utilities, premises) infrastructure. If infrastructure means development of houses in a beautiful area of the village NO.	Noted. Policy WAD11 has been reviewed to address this point.
129.		Please say which shops in the highstreet have closed due to traffic congestion	Noted.
130.		Some of these policies are unachievable in a market economy	Noted and policies have been consolidated and reviewed to address this point.
131.		The best way to revitalise the economy is to reduce tax which nobody appears willing to admit.	Noted.
132.		the current situation is "safe"	Noted.
133.		There should be a limit to the new businesses encouraged as again Wadhurst would lose it's "village" feel	Noted – see Ref 120.
134.		to support and encourage all green, sustainable environment friendly businesses	Noted.
135.		Tourism should not be a priority. Free of charge car parking in High Street to support shops. Fair business rates.	Noted but mostly outside WNP scope.
136.		We don't want horrible looking shops that do not fit in with the village .For example the new Barber shop looks completely out of place in Wadhurst . There	The Design Code has been prepared to address the 'look and feel' of development.

Ref.	Section	Summary of comments	Commentary from Steering Group
		should be limits to what is acceptable and I think you will find everyone feels the same .	
137.		Where is the evidence that shops are closing because of congestion ? Some years ago, there was a proposal to remove parking from the High Street which the chamber of commerce rightly opposed after considering how such removal from Burwash High Street had almost wiped out its local shops.	Noted – this section has been reviewed and reworded.
138.		Although I agree in principle with supporting local businesses and the self employed I think the plan needs to strike a balance. It is difficult to say that on the one hand we have a traffic and parking problem, but on the other hand we don't want to encourage businesses which are going to attract more traffic and parking. Support for sustainable and appropriate businesses is OK. Over commercialisation of the high street could also alter the feel of Wadhurst and is not. Any business development should be for the benefit of residents rather than attract more people.	Noted.
139.	AONB	Developments between Parish distinct communities can be accepted provided they are sympathetic to the landscape and improve connectivity through sustainable transport (pedestrian and cycling) between such communities. Furthermore, developments that promote sustainable building design and living should be encouraged; this should include for the enhancement of biodiversity.	Noted. A Design Code has now been prepared to underpin the plan. Policy WAD1 addresses location of development and policies are included to support and promote biodiversity.
140.		Dichotomy between housing standards in the two sections where housing is mentioned	Noted and reviewed.
141.		I agree with the objectives, but as mentioned the planning application WD/2021/1285/MAO goes against EN1/EN2 Conserve and protect AONB . PEN3 - protect views and PEN4 - protect green gap land if this planning goes ahead.	Noted. The WNP seeks to retain such green gaps.
142.		I do not feel the language on protecting AONB / ancient woodland is strong enough when there is already encroachment on it. Also, p 23 citing the	Noted. The plan has been reviewed in light of comments from the AONB Unit.

Ref.	Section	Summary of comments	Commentary from Steering Group
		proposed Marling House development as Brownfield is outrageous ... it is a FIELD, which decades ago was occasionally used as a cricket field. Current occupants have sometimes put livestock on it	
143.		I do not see the importance of maintaining a distinction and of keeping a green space between Wadhurst and Durgates. In my view both Durgates and Wadhurst High Street equally constitute Wadhurst. In the past there were 2 settlements but in the present day the 2 settlements have all but merged into one village.	Noted, although it is considered important to retain the character of the historic nature of the settlements.
144.		I entirely agree with the general objectives, but would point out that the suggestion that part of the grounds of Wadhurst Castle (of which I am the owner) is available for informal public access is incorrect. It is farm land and we hope to embark on a major tree planting scheme soon, and also wish to conserve and improve the habitat. The land is on the National Register of Parks and Gardens	Noted and amended.
145.		I generally agree but the context is wrong. The ANOB is protected under statute by Natural England and administered by four counties and 11 district authorities. In addition the use of the term 'executive home' is over emotive. There are mostly 2/3 bed houses on Waters reach and at the Red Lion.	Noted.
146.		I wouldn't be prioritising the dark skies point as I suspect this might be a minority view	Noted although this has been evidenced as important through the community engagement to date.
147.		Latest development was on green field. Developers are having a laugh.	See Ref 1.
148.		Mature trees are a valuable source of carbon capture and therefore all development proposals which involve the destruction of mature trees should be resisted. The practice of developers replacing mature trees with saplings should be resisted given the urgent nature of the climate emergency and the length of time it will be before saplings are able to	Noted and this is included in the biodiversity policies.

Ref.	Section	Summary of comments	Commentary from Steering Group
		capture the amount of carbon captured by mature trees.	
149.		Once again....it sounds great. The reality seems to be that Councils have been given quotas to build lots of new houses and when push comes to shove, new houses are deemed to be more important than wildlife, light pollution, views etc. and existing home owners have to content with more traffic on roads which are already dangerous.due to speeding motorists and roads which seem to be increasingly prone to pot holes.	See Ref 1.
150.		prioritise eco, green homes that are sustainably built and low impact on the environment and future energy consumption	Noted – Policy WAD4 has been crafted to address this point.
151.		Priority is for Affordable Homes - most important aspect of Parish development !	Policy WAD2 addresses local housing needs.
152.		That does not make any sense. How can you develop without any development? We clearly need more homes. We have lost employees over many years because they cannot afford even to rent here or nearby. If the village grows it makes more business for the local economy. There is no definition between Wadhurst, Durgates, Sparrows Green and Cousley Wood. It is one community. All houses were new once and we live in them. Why are you trying to strangle the life out the area by keeping it for the old. The population is growing, unless you change that you must allow for more homes.	Noted. The Plan is not seeking to stop development, rather ensure that it is undertaken sustainably.
153.		The objectives are fine if they are adhered to, but some years ago Anderida were allowed affordable development (good in itself) on land that was cheap solely because it was not open to other development because it was in a then designated or similar area.	Noted.
154.		Think there are more important things to be done than these - when the others are done - then have a go	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
155.		We simply cannot sustain further development. Choose somewhere else .	
156.		Whilst I agree in principle with all of the Objectives and Policies, many of these obviously not currently being implemented, with the current crop of planned developments, and those currently under construction.	Noted. See Ref 1.
157.		Yes I do agree but wanted to add another comment - is it possible for you to add the option 'add comment' next to the 'yes/ no' option? There is an objective I. High Weald AONB management plan there to save irregular shaped fields FH2	Noted.
158.	Green gaps/ local green spaces	You cannot develop sustainable houses in Wadhurst without changing the infrastructure of the village, more parking, larger school, more capacity at an already over-stretched doctors surgery	Noted – these are the responsibilities of other agencies.
159.		You can't protect and conserve rural areas AND have development. If you are committed to a neighbourhood plan that delivers on moving Wadhurst into a village that is vibrant for people who work, need to be part of an economy and culturally engaged, then it has to embrace some element of progress and development. You can't just rewind fifty years!	As above.
160.		additional protected areas in the west flank of the mapped area	Noted.
161.		Agree with these areas but not sure how they have been allocated and what they signify. Is there any way to get further information and/or there could be more allocated?	Additional justifications have been provided in the amended WNP.
162.		All Green Field open fields and spaces need to be protected	Noted but this is not possible to do. WAD1 sets out where development would be most appropriate and sustainable.
163.		All the fields connecting GG5 all need to be protected, as agricultural land, and an area of outstanding beauty for the village.	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development.
164.		any new dwelling reliant on Blacksmiths Lane to access a main road should be discouraged	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
165.		Appalling and negligent destruction of areas of natural beauty and wildlife havens.	Noted.
166.		area enclosed by by highstreet, blacksmiths lane, and turners green road should also be protected.	Noted, but this would be outside the justification for a green gap.
167.		Cannot see where they are because the map is unreadable - shame	Maps have been reviewed and prepared to larger scale.
168.		Cant see the map properly and clearly to make a comment	As above
169.		congestion is at certain periods of the day and dependent on school holidays and major deliveries. Housing development should include the prioritising of housing for residents of Wadhurst who are first time buyers who require affordable properties.	Noted.
170.		Cousley Wood Cricket Ground owned by the Cricket Club (shows already protected)	Noted.
171.		Developments should be restricted to areas close to the High St. ie within a 5 minute walk. This will encourage use of the shops etc. without the need for a car. The designation of green gaps should allow for this and more robustly defend the AONB in more outlying areas.	WAD1 sets out where development would be most appropriate and sustainable. Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development
172.		don't believe it	Noted.
173.		Feel there could be more protected green space added	The Plan includes a series of green gaps to prevent coalescence and erosion of character. There is also a policy to designate local green spaces that have been identified by the community as important to them.
174.		Fields surrounding Blacksmiths Lane should be protected because of the value they provide for wildlife and people who enjoy the circular village walk and longer walk or cycle route to Bewl Water.	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development
175.		Firstly the map is too small to really identify areas properly. At the Commen hall the map was in black and white so impossible to make out when the descriptions were of colours! You do not identify what you mean by Parish in red. If we want to develop business then we should consider	Maps have been amended.

Ref.	Section	Summary of comments	Commentary from Steering Group
		putting a mix of sport, social, craft and business units in to create jobs and make for a fun place to be. There is no social hub here where we can have music and mix together. It will require buildings.	
176.		Further protected green gaps required down country lanes for example the fields surrounding Hamlet off Woods green as these sites are not suitable for housing development due to extra traffic on narrow country lanes. Fields next to main roads should be highlighted as areas for planning if required	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development
177.		GG4 [green gap] should be considered for a protected green space as it continues on from Turners Green Fields 2 & 3. It fits criteria for: protection of views in HWAONB, tranquility and beauty, recreation - footpath 46, wildlife and protection of dark skies. Private land and will not be offered for sale for development in the foreseeable future	This has been identified as a local green space in review of the Plan.
178.		GG5 should be enlarged, as it is the key to the views of the village and church from Sparrow' Green. LG14 and GG1 are welcome, but having allowed Water's Reach to be built is anything sacrosanct?	Noted.
179.		Given the necessity to increase the housing stock but preserve the green spaces there are certain areas which could be considered for development, mainly on the edge of existing centre town locations - GG1, GG5, LG2, 4, 6, 7	Noted.
180.		I agree with the designations as planned. However is it possible to add more? The fields between the High St and Blacksmiths Lane are unprotected.	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development
181.		I agree. So why is there a planning application WD/2021/1285/MAO in place to build on GG5 Already protect green space??	Noted.
182.		I believe field and woodland along Tapsells Lane should also be included in Green Gap designation	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development

Ref.	Section	Summary of comments	Commentary from Steering Group
183.		I believe that some of those infill areas marked on the map in green particularly at the end of Station Road or to the north east of the village could in fact be used for further housing development, provided they supply some affordable housing for local young people, and are self build, and are of sustainable construction. However some of the smaller narrow roads going north from the village into Tunbridge Wells will have to be widened to account for traffic	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development.
184.		I believe that the designated areas are appropriate but that the extent falls short of protecting the local environment, HWAONB and the WPC vision & policies expressed in this document.	Noted. There are a range of policies in the WNP aimed at protecting the special AONB environment.
185.		I cannot see the logic of the green gaps as indicated. Few appear to fulfil the objective - on the assertion that it is a green space between two residential or industrial areas.	Noted – further justifications have been provided.
186.		I do not consider the old playing fields of Wadhurst College as a significant green space dividing communities. It is not near a significant cluster of housing and population. This could be considered as a brown site for development as it is not visible from the road.	Noted – further justifications have been provided.
187.		I do not feel that there are enough Local Green Spaces that are easily accessible, especially for the large number of Dog owners in the village, myself being one of them. Due to most of the land being privately owned, we are relegated to using the roads, many of which are very narrow (especially currently, with the verges and hedges bordering these roads not being cut!), nearly all of which have no safe pavements, and have a significant amount of traffic (especially at peak times) due to being used as "rat-runs" to avoid the congestion in the High Street; furthermore, there are currently no areas where dogs can be exercised off-lead safely, without fear of them being hit by a fast-moving car.	Noted – access to space is outside the scope of the WNP.

Ref.	Section	Summary of comments	Commentary from Steering Group
188.		I do not think that all are sustainable in planning terms	Noted – further justifications have been provided.
189.		I don't understand the question - how can I agree or disagree if you have not explained any alternatives?	Noted.
190.		I don't understand what those categories mean nor the implications	Noted – this has been further explained in the updated version of the Plan.
191.		I find it difficult to believe that the AONB land to the east of Sparrows Green Road is not included in these proposals. The public footpaths and views that are enjoyed by many locals would be lost if this land is developed. Building on this land would have an enormously detrimental effect on the residents of Sparrows Green and their homes.	Noted – further justifications have been provided.
192.		I strongly support the Green Gaps and Green spaces concept. The distinct hamlets making up the parish should be maintained as such. If anything I would support increasing the numbers of such areas to resist the pressure to 'make exceptions' and to ensure that the rural character in this area is maintained for the future	Noted.
193.		I think there should be some parking and services improvement off the high street, (for example a village public park w/ parking) also the new green areas seem arbitrarily chosen, I don't see a effective green belt of agricultural land surrounding the village, which is what is needed	Noted – further justifications have been provided.
194.		I would suggest there should be more than those listed, large housing developments are just not needed as we do not have the infra to support.	Noted – further justifications have been provided.
195.		I'd have more areas protected	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development.
196.		Id like more designated protected areas in durgates and the wadhurst end of tapsells lane	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development.
197.		If these are amenity spaces, I agree, and presume AONB will be marked elsewhere	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development.

Ref.	Section	Summary of comments	Commentary from Steering Group
198.		It doesn't really feel like there are enough of them. I think there should be more in the rectangle of land behind the high street and running up to Blacksmith's lane, then back to the Cousley wood road.	
199.		It has not been explained what these 3 types of area are. Would be nice to know!	Additional clarity included in amended WNP.
200.		It is more important to provide leisure facilities for the existing residents than to preserve existing views. The addition of a swimming pool would be a health benefit and would provide an opportunity to learn an important life saving skill.	Noted, but would require a developer to propose this.
201.		Just to point out that the castle, its buildings and its land next to the Castle, which it is sought to make a Green Gap, is listed. The field is on the National Register of Parks and Gardens.	Noted.
202.		LG16 should be extended and protected	Noted. The justifications for the LGs have been added to.
203.		More farming land should be protected in the centre of the village	Noted – highest quality farm land is already protected by way of the NPPF.
204.		More farmland in centre of Wadhurst should be protected	As above.
205.		More green spaces needed within the village , to retain the village atmosphere	The Plan seeks to designate a number of local green spaces to protect these from loss.
206.		More green spaces require protection- in particular the area between primary school playing field and Blacksmiths Lane.	As above.
207.		Much more should be protected - for example, the whole space around Primmer's Green.	Noted, but the Plan cannot be used to prevent development and all spaces must be fully justified.
208.		not covering enough of wadhurst	Noted.
209.		Not enough to protect the environs of the village and provide enough green spaces	Noted.
210.		Once building encroaches on these spaces and areas it will just keep expanding over time and wadhurst has already changed from the nice rural village I grew up in	Noted. The Design Code which has now been completed seeks to ensure that any new development contributes to the character of the area.

Ref.	Section	Summary of comments	Commentary from Steering Group
211.		Pointless as developers will encroach, look how developers have breached guidelines in Ticehurst. Planning permission should have direct cost benefits to the community. You want 5 houses, you build an agreed new GP surgery.....the cost of that generally deters most.	Noted.
212.		Should be more. More land should be persevere/protected.	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development.
213.		Shouldn't GG5 extend down as far as Pell Bridge cottages, Primmers Lane	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development.
214.		Significant thought needs to go into the provision of green spaces and areas for recreation. Privately owned land is one option such as Wadhurst Park and surrounding area but also areas in an around current housing needs to be significantly increased to avoid over crowding and unsightly developments	Noted. The Design Code which has now been completed seeks to ensure that any new development incorporates green space.
215.		some green space may have to be used for car parking	Noted.
216.		Some of the GG areas could be developed with minimal impact on the overall feel of the village. If we have to make sacrifices to appease the planners one or two of these should be considered after brown sites of course.	Noted – further justifications have been provided to demonstrate why the proposed GGs are important.
217.		The above map does not include the full designated area covered by the Plan - specifically the far end of Cousley Wood Windmill Lane/Newbury Lane triangle. Consideration should be given to including this area for protection	Maps have been amended.
218.		The brinkers lane gap next to four winds, should be protected, the enquiry back in 1987 rejected housing as the same land was seen as developing ribbon development. ill send the decision.	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development
219.		The field between LG4 and LG16 also urgently needs protection. If anyone one of the large adjoining properties bordering the main road decided to sell to developers it would offer access to this prime	Noted, but green gaps / spaces need to be carefully justified. The policy cannot be used to stop development

Ref.	Section	Summary of comments	Commentary from Steering Group
		development land, with access to the main road. It is currently used to graze sheep, however it is full of native grasshoppers, crickets, butterflies, moths and other invertebrates. Bats, Owls, Woodpeckers, a range of Corvids, Wrens and Blackbirds use the land to roost, nest and feed. Populations of Hedgehogs, Foxes, Rabbits, Newts, Toads, Grass Snakes and many types of Dragon Fly and Damsel Fly are consistently observed either in or around this particular field and the ancient natural spring fed pond next to it provides a water source and sustenance for many of them. P.S. "Wellie Walk is historically known as 'Doctor's Lane'"	
220.		The football pitch behind the Commemoration Hall should be used for development of parish facilities such as new GP surgery, car parking etc. The football club can move to Sparrows Green pavilion. The cricket pitch should remain.	There are no plans for such changes.
221.		The Green Gaps Designations need to be upgraded to Protected Areas.	Noted but protected areas is not a planning designation.
222.		The green space (with pond and trees) on the corner of Mayfield Lane and Baldock Road should be protected. It has an abundance of wildlife (including newts and bats) and flora. It is currently used for sheep-grazing over the spring/summer period and plays a significant role in enhancing the rural feel of the area. Any new housing development on this plot would result in major traffic problems, particularly dangerous on narrow roads with close proximity to the Sacred Heart School.	Noted, but green gaps/ spaces need to be carefully justified. The policy cannot be used to stop development
223.		The land next to Jonas drive must be protected due significant wildlife and road capacity	Noted, but green gaps/ spaces need to be carefully justified. The policy cannot be used to stop development
224.		The map is too small to be able to read properly and the colour key is insufficiently explained. What are the spaces which are not coloured? Are they prospective development sites? If so, I think there probably needs to more protected sites.	Maps amended.

Ref.	Section	Summary of comments	Commentary from Steering Group
225.		The map, and one suspects focus of the plan, despite contrary assertions, only covers the centre of the village. There are other areas which need protection, eg the view south-eastward views along Darbys Lane towards Stonegate and Burwash. Section 5.1.16 mentions as "Brownfield Sites" "several large farms... beyond the Development Boundary"; turning old farm buildings into, say a business centre, is acceptable, even good, as long as it does not cause the associated fields to lose their agricultural viability and then be turned into development sites.	Maps amended
226.		The map, and the accompanying question, is only partly comprehensible. It needs much more explanation. What are the letters inside the boxes, for example? Are we being asked whether we want more green spaces added, or whether the ones shown are unsatisfactory, and should be changed? I would like to see a much more extensive green belt than is shown here.	As above
227.		The plan does not show Cousley Wood Windmill lane site?.	As above
228.		The plan seems to cover part of the parish and should include the rest of the AONB towards the railway station.	As above
229.		The proposed green gaps still live a huge amount of land free for development. The Cousley Wood area particularly seems to have little protection except for the cricket ground. I would think some of the green areas there would qualify for 'green gap' designation, especially taking into account the current size and history of the village, and some of the wonderful views it affords	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development
230.		The provision of Green Gaps does not appear from the map to have included any areas in and around Cousley Wood - is this an oversight ?	
231.		The two largest green "gaps" are to the south of the village which will mean increased traffic heading	

Ref.	Section	Summary of comments	Commentary from Steering Group
		through the village as they head towards the station, village and tunbridge wells.	
232.		There are plenty of brownfield sites available in Wadhurst I think the green designation should be increased from those shown	There are in fact not many brownfield sites. Policy WAD1 includes preference to use these sites over greenfield.
233.		There are proposals for developing the “green space,” field off Windmill lane/Baldock Road. Why is this area not included in the areas to resist for development? Development would destroy the aura to the existing development surrounding houses. The access and parking (which is already a problem due to cars parked because of the Primary School on every school day) would be a nightmare during and after the building took place.	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development
234.		There is an area of land to the back of John Chapmans removal business which is an area considered by the local neighbours to be of great undisturbed beauty. It has many old trees particularly oak trees and wildlife such as foxes, badgers deer and birds of prey. This year there are orchids growing in the field. To disturb this in the future would not only impact on the views but more importantly would destroy areas that encourage wildlife.	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development
235.		There needs to be more protection of our green spaces	Noted. The Plan seeks to achieve this.
236.		There should be more local green spaces	Noted.
237.		This is a great idea- to protect green gaps- as they are easy pickings for developers. I'd love to see it go further- to join them up into green corridors for people and wildlife, particularly at the back of the high street- a “greenway” between Sparrows green and the church.	Noted.
238.		This is a very positive start, but does not go nearly far enough. There are large areas of land with proposed development not covered here, which again provide a potential loop hole for developers.	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development

Ref.	Section	Summary of comments	Commentary from Steering Group
239.		This is all boundary land. There is no space for development without touching this land as everything within it is already built. So where will the development happen?????	Noted, but green gaps need to be carefully justified. The policy cannot be used to stop development
240.		This isn't clear. I think this needs more explanation for the general public.	Noted and additional clarity provided.
241.		This looks like every area put forward under the last two calls for sites. It is inevitable that there will be development in Wadhurst so the NP should look at the sites and try and work with some that will be the best for the village in terms site, mix of housing and costs. To object to everything may well lead to the NP failing and leaving the village totally unprotected.	Noted- additional justifications for these areas has been provided.
242.		This map does not cover the whole Parish e.g. Conservation areas NE of Cousley Wood / near Windmill Lane. These areas to be reviewed.	Mas amended.
243.		This map does not explain in any detail what you are asking for comments on	Noted.
244.	Views	A further view should be added from Pell Green north across to Bayham Straight and Tunbridge Wells	The views have been carefully selected based on evidence gathered during the engagement phase for the consultation. Each has to be carefully justified. It is not possible to try and safeguard every view, hence those that have proved most popular and which can be shown as being particularly special are the ones that have been selected for the Plan. Also those that are most likely to be impacted by development.
245.		Again it appears Cousley Wood has been excluded. There are numerous sites worthy of View Designations - in particular from Windmill Lane views over Bewl Water	See Ref 244.
246.		Again, I agree with these, but there are many other areas not covered and the map cuts off parts of Sparrow's Green and locations around Station Road and Old Station Road. It is too limited in its current form.	See Ref 244.
247.		Again, it feels a bit selective? Shouldn't we try to protect more views?	See Ref 244.

Ref.	Section	Summary of comments	Commentary from Steering Group
248.		Again, the map is useless because you can read it therefore cannot answer the question	Maps amended.
249.		Agree that the selected views are appropriate but the plan doesn't encompass many views that should be included particularly to the South and views to the north from the southern perimeter and public footpaths.	See Ref 244.
250.		Agree with these views but not sure how they have been allocated and what they signify. Is there any way to get further information?	See Ref 244.
251.		Agree with those shown but what about others beyond the limits of the map? Eg . Around Woods Green .	See Ref 244.
252.		All of the local views should be protected in order to protect the character of the village and peoples homes.	See Ref 244.
253.		All of the views towards Snape Wood should be protected, particularly from the public footpath in Lower High Street, leading to Snape. It would be a travesty to lose such an ancient view.	See Ref 244.
254.		Best views (8+9) as of raised farmed land - ??? road	See Ref 244.
255.		Cant see the map clearly and properly to make a comment	Map amended.
256.		Certainly agree with these, but what about the Durgates side of the village?	See Ref 244.
257.		Cousley Wood is not shown in your plan. I would suggest Windmill Lane with views over, towards and beyond Bewl Water should be included.	Maps amended.
258.		Cousley Wood should be included in that map!	As above.
259.		Definitely agree - I would just say it would be good to extend these protected views throughout the parish if possible, not just central Wadhurst	See Ref 244.
260.		Don't understand the designations	This has been made clearer in the supporting text.
261.		Hard to determine from map provided	Maps amended.

Ref.	Section	Summary of comments	Commentary from Steering Group
262.		I agree absolutely with these but would add, for example to the B2100 road outside Cousley Wood both sides of the road from Windmill lane southward	See Ref 244.
263.		I agree that the area/field at Turners Green Road should remain as is and should not be built upon ie The Site of the last bare knuckle fight. However the area behind the existing new builds at Waters Reach, should I feel be considered for extra housing for the village.	Noted.
264.		I agree the proposed views but also add the view towards Bewl Water from Windmill Lane, Cousley Wood	See Ref 244.
265.		I agree with the designations, but to be worthwhile these views need to be accessible in order to be appreciated. The view to the west at the top of the High Street is obscured by the hedge for example	All views are viewable from publicly accessible locations.
266.		I agree with the protection of all the views but views 2a & 2b would be destroyed by the proposed planning application WD/2021/1285/MAO	Noted – the policy addresses this. Developments can incorporate views into their overall design.
267.		I agree with those shown but would also add those from Pell Hill and Blacksmiths Lane	See Ref 244.
268.		I believe the views from the back of the Commemoration Hall/Library and the Uplands Gym are also highly valued and should be identified as such.	See Ref 244.
269.		I do not think all these are sustainable in definition terms	Noted.
270.		I don't think that views 4 a and B, 5 a and B, and 6 can necessarily be seen by that many people unless they have private access or are very regular users of the footpaths to the east of the village but I agree that the other views are easily seen when driving through the village and therefore should be more protected	All views are viewable from publicly accessible locations.
271.		I feel more areas should be protected for view designation	See Ref 244.
272.		I recommend including view from Station Road south west towards Tapsells Lane also be included.	See Ref 244.

Ref.	Section	Summary of comments	Commentary from Steering Group
273.		I suggest that the beautiful views from Windmill Lane over miles of country should be added to the list.	See Ref 244.
274.		I would increase the number of views protected from those shown on the map to include many more views to Bewl, etc	See Ref 244.
275.		I'd have more	See Ref 244.
276.		impossible to see. Map is far too small.	Amended.
277.		In order for development views 2a and 2b may have to be sacrificed.	See Ref 266.
278.		Lack of view designations for properties on the Mayfield/Mark Cross Road which look South; also lacking in view designations from Tidebrook Road	See Ref 244.
279.		More protected views required	See Ref 244.
280.		More views need protecting	See Ref 244.
281.		More views should be protected	See Ref 244.
282.		Need to include other distinctive views in North of Parish looking West and North from fields designated as local Green Spaces	See Ref 244.
283.		Needs to be more wide spread	See Ref 244.
284.		Poor form printing - can't see	Maps amended
285.		Poor printing - cannot see	Maps amended
286.		Same as last answer and the NP have already been told by WDC that all these are not acceptable.	Noted.
287.		should be more	See Ref 244.
288.		The map doesn't include Cousley Wood which has some fabulous views that should be protected. Why is Cousley Wood not included?	Maps amended.
289.		The view from the field where the last bare knuckle fight took place should also be listed	Noted – this site is now included as a local green space and non designated heritage asset.
290.		The view from Windmill Lane, Cousley Wood towards Bewl Water should be designated as a protected view. It is a very popular viewing area being at a crossroads with lots of walking routes and used by	See Ref 244.

Ref.	Section	Summary of comments	Commentary from Steering Group
		tourists at the local caravan site. Tourists are attracted to use both Waghorns and Rainbow end (Newbury Lane) Caravan sites because of this view. Also used by Bluecaps Lama Walks.	
291.		There are many more that need protection.	See Ref 244.
292.		There are more distinctive views that need protection along Old Station Road etc. They fall outside the area of the map shown	See Ref 244.
293.		There is a further view from the 'Commem' cricket field looking south.	See Ref 244.
294.		This is nonsense. If you build a house in a nice place it will have a nice view. It may change the view of what was there but it can still be beautiful. You cannot say that a field is prettier than a village. You need green areas granted. It is about design.	Noted.
295.		Views should be protected from Pell Hill, Woods Green road, Turners Green Road and from the field between Three Oaks Lane and Turners Green Road.	See Ref 244.
296.		Views to the south of mayfield lane have not been included. In light of possible development on this land I would argue that this view should be protected.	See Ref 244.
297.		We need to protect as many green spaces as possible.	Noted and the plan has included those spaces that have been proposed by the community and which can be justified against the NPPF criteria.
298.		Windmill lane view is extremely important but not shown on this map	Maps amended.
299.		Would like views from Windmill Lane to Bewl Water in Cousley Wood included	See Ref 244.
300.	General	1) The Commemoration Hall is not fit for purpose. 2) The Surgery should be replaced.	Recrafted Policy WAD18 provides support for this.
301.		1. Wadhurst's rural character is based on its support of agricultural activities: there needs to be a clear objective to continue that support, both by protecting land but also in other ways, eg providing genuinely affordable housing for those working it. 2. Wadhurst hosts a good number of elderly and	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
		disabled people. Please can we have a specific objective that all developments bear them in mind, particularly with regard to improving pavements and shop entrances	Policy WAD7 addresses this point.
302.		<p>2 big issues:</p> <p>1. Waste disposal - with the recycling are now closed fly tipping is on the increase. we need a recycling area as per we used to have or similar.</p> <p>2. Road safety / footpaths - From the station towards Frant speeding is rife and there is no footpath for people trying to make their way North from the station, many times i have seen near accidents with pedestrians on the road. Likewise cars often park on verges around the station making the area even more hazardous. If we want a safe environment and to encourage tourism we need to sort the footpaths out around the arrival point which is likely to be the station - In sum footpaths to the North of the station are urgently needed or we are waiting for an accident to happen.</p>	<p>This is responsibility of ESCC as waste authority.</p> <p>Policy WAD7 addresses this point.</p>
303.		Affordable housing is massively important. £500,000 for a house is NOT affordable. It is also vitally important as you have said to keep the fields and views, these have been especially important during the pandemic.	Policy WAD2 sets out local housing needs that should be delivered via new development.
304.		Again, this is all about protecting existing facilities. Currently the leisure facilities for anyone in Wadhurst who is under the age of fifty is pretty negligible apart from eating and drinking. Don't see there being any real commitment to actually introducing any new leisure facilities.	Recrafted Policy WAD18 provides support for this
305.		Allowing nature to thrive - becoming a nature-friendly village	Noted – there are a series of policies seeking to achieve this.
306.		An important aspect of infrastructure is ensuring connectivity - e.g. there is currently no reliable mobile	Noted – this is considered under national policy.

Ref.	Section	Summary of comments	Commentary from Steering Group
		phone/data signal at Wadhurst railway station making usage of the SE Trains APP & Parking APP impossible. Businesses will only locate in areas with sufficient connectivity to the internet and phone networks. Connectivity in the town is patchy at best.	
307.		Any developments should be environmentally sustainable in use of materials reducing the carbon footprint, as well as being sustainable for the future in their energy needs and use. Solar and ground/air source heat pumps as well as shared community energy sources should be promoted.	Noted – recrafted policy WAD4 addresses this.
308.		Any new development MUST take into account the native wildflowers and populations of wild animals that will be negatively impacted. Ponds, wildlife corridors, e.g. managed verges with wildlife in mind, hedges (not close boarded fences) nesting/feeding areas, plus provision, and maintenance of, nest boxes, bee/bug hotels should be a consideration in all areas of the village especially new developments.	Noted – this has been included in recrafted Policy WAD13.
309.		Apologies if I missed the following: air quality (traffic from the South through high street); traffic generally from South end already increased due to developments in Ticehurst and Flimwell; do we actually need all these houses given Brexit and accommodation available in the Cities following COVID ? Groundswell of political change against over development.	See Ref 1.
310.		As above ... I feel the Durgates side has not had enough attention.	Noted.
311.		As I have previously stated, I feel that there needs to be dedicated facilities/spaces for the multitude of dog owners in the village, without them having to resort to driving to find the nearest area, thereby adding to an already congested traffic system, increasing pollution, etc. More thought needs to be given on how best to accommodate pedestrians, especially those with	Noted, although such spaces are not within parish control.

Ref.	Section	Summary of comments	Commentary from Steering Group
		<p>pushchairs/young children, dogs, etc., when travelling into the village; with better and safer access, this may encourage less people to use the car when taking their children to school, etc., and would make it safer for all.</p> <p>Suggestions could include a 20mph speed limit throughout the whole of Sparrows Green and the High Street; a dedicated Pedestrian crossing in the High Street, near to the old Nat West bank building; "No Parking" restrictions in the area around the Primary School, especially along the main Durgates to Wadhurst road, around the junction of Sparrows Green, which at school run times is extremely dangerous for ALL road users; and also 'encouraging' property/land owners, and local farmers, to cut the hedges and verges that border the surrounding narrow lanes.</p> <p>The current infrastructure to support further developments in Wadhurst are wholly inadequate; not just schools at capacity, GP's surgery unable to take on any further patients, lack of parking (not just for residents, but employee and visitor parking as well), traffic congestion and pollution, poor quality road surfaces, etc., but the services (water (both fresh and rain water run-off), sewage, gas and electricity, etc., are also under immense pressure - further development in Wadhurst would take these beyond their limits, leading to more and more breakdowns, and further disruption and congestion when service providers call contractors in to repair them.</p>	
312.		<p>As one of the many dog owners in the village I feel there is no provision within easy walking distance of the village to exercise dogs safely. Unlike many villages we don't have a large village green where dogs and children can play Safely. We are in urgent need of a greenfield site which can be enjoyed by walkers, children and</p>	<p>Noted – the Parish council does not own such spaces, therefore provision would have to come forward either from a landowner or as part of a development.</p>

Ref.	Section	Summary of comments	Commentary from Steering Group
		dogs. Our only option is to walk on narrow country roads with no footpath which is becoming more and more dangerous with the increased traffic using them.	
313.		availability of evening and light night train services locally and further afield are currently very limited. pedestrian route to station is often over grown and at times dangerous. lack of emphasis to traditional building materials and styles. lack of community energy and other green programmes	Noted – outside the scope of the WNP. Design Codes have been prepared to address this, which underpin Policy WAD3 and 4.
314.		Better protection and repair of public footpaths, especially for people with limited mobility and dog-walkers. Some stiles have very restricted accessibility.	ESCC are responsible for pavement maintenance. Policy WAD7 supports the ideas expressed here in the comment.
315.		Bus services	Outside scope.
316.		connectivity between the village and areas of potential development with the train station should be improved, that encourages pedestrian and cycle access, and throughout the Parish.	Policy WAD7 supports the ideas expressed here in the comment.
317.		Consideration of drainage issues on developments, large and small should be made before a Planning Application is approved. Wadhurst clay can cause many issues with drainage and should be taken into account prior to development.	This is the responsibility of applicants and the water company.
318.		Cycle paths need to be prioritised between Wadhurst, Cousley Wood, Lamberhurst, Tunbridge Wells. Stop parking in Bewl Bridge Lane. This should be access to Bewl on foot or by bike only. People who want to drive can go Via A21 to proper car park. Reduce speed limits on roads to 30mph to stop motorists using our roads as short cuts and rat runs. This includes the Bayham Rd and Bartley Mill Road where many deer are run over every year. Also Cousley Wood Road speed limit is too high. Women	Noted – this is something the PC can take up with ESCC, who are keen to support active travel - Policy WAD7 supports the ideas expressed here in the comment. Speed limits are outside WNP scope.

Ref.	Section	Summary of comments	Commentary from Steering Group
		and children will not adopt cycling or walking where 60mph is speed limit and there are no cycle lanes or pavements.	
319.		Dark skies is a real issue which you should be tackling, some new houses and developments are flood lit at night	Noted – the policy has been further reworked with additional justifications.
320.		Discourage through traffic and speeding.	Outside WNP scope.
321.		Do not allow a pedestrian crossing in the High Street because it will take up too many parking spaces.	Noted. This would be outside the scope of the plan.
322.		Evidence of need should be supplied with each new planning application	Policy WAD2 requires this in terms of the housing need.
323.		fix washwell lane	Noted.
324.		Give priority to protect existing sports space and provide an opportunity for more, particularly a swimming pool	Noted – the policies seek to protect existing community facilities and support new ones.
325.		Great suggestions and ideas. The most important aspect is to preserve the countryside and environment. If I wanted expanded services I would move to Tunbridge Wells. Traffic in the village is an issue only when a lorry/ bus drives through. Or an anomaly- such as an accident. This is the same for everywhere. Widen the road more traffic will come, causing other issues. Affordable housing means (to me) 2/3 bedroom cottages for young families- not 4 bedroom assisted-buying. Pockets of new small houses are key to keeping the village a village and the environment in which it sits. And within that follow the linear of the village (as waters reach does).	Noted – the policies collectively seek to achieve this.
326.		Green/crayon-reduction and sustainability agendas are not adequately promoted. More emphasis required on policies that get people out of cars, walking, cycling or using shared local transport schemes (eg: e-bikes). I strongly suggest that easing traffic flow in the village will only result in more traffic, policies should seek to reduce traffic speeds and	Policy WAD4 now focusses on sustainable design. Policy WAD7 seeks to promote active travel.

Ref.	Section	Summary of comments	Commentary from Steering Group
		encourage mixed road usage with cycles as in Holland.	
327.		Happy with the major issues	Noted.
328.		<p>Having moved here a year and a half ago it is a worry that there are so many new build developments planned. It seems it is about money and targets rather than protecting the villiage and creating a place for families which is what wadhurst seems to us. We don't have children ourselves but it is a family village. If you must build accommodation use what is there already. Don't destroy what you can't get back once built on.</p> <p>The council should be looking into fixing the roads to make them safe to drive on and looking after the wildlife rather than taking away any land. It may just seem like an empty piece of land, but for the people that live here it's so much more.</p>	<p>See Ref 1.</p> <p>This is ESCC responsibility.</p>
329.		High street commercial spaces should be appropriate to the village ethos	Noted.
330.		<p>Housing development is extremely worrying and our countryside needs protecting .</p> <p>Development on our AONB areas must not happen our village cannot cope with more traffic or generally more people as our facilities are already bursting at the seams (schools , doctors etc) protecting our village is paramount and top priority !</p>	See Ref 1.
331.		<p>How feasible is a relief road to take traffic away from the centre of the village?</p> <p>Should Uplands and the community centre/gym have their own parking to let shoppers have grater access to the car park?</p> <p>Greater protection of AONB esp outside the Parish development boundary.</p>	<p>Not very feasible in current climate and without major investment.</p> <p>Potentially. The Plan would support this if it could be achieved sustainably.</p> <p>Noted – national planning already affords such protection and the WNP reinforces this.</p>

Ref.	Section	Summary of comments	Commentary from Steering Group
332.		I am happy that the areas identified meet my concerns, transport and protection of the countryside in particular.	Noted.
333.		<p>I believe that a village benefits hugely from having very visible green space and recreation facilities. In Frant for example, the bowling green, cricket pitch and play area are in the heart of the village. The new development in Southborough introduces views from the main road which enhance a new feeling of space. The Comm Hall is probably time expired and a change of location would enable a new green area to be created in the heart of the village with views down to the sports fields beyond if it was pulled down. Identifying a new location and funding a replacement could all be linked to a levy (section 106) which our NP could oversee as part of the overall long-term plans for the village.</p> <p>Employees who drive to work in the High Street should be required to park away from the High St itself, for the benefit of customers.</p> <p>Greater parking provision is also required.</p> <p>Traffic congestion and danger hotspots occur elsewhere in the parish, with Durgates being notable in three places at least. As congestion naturally reduces traffic speed and a pedestrian crossing needs a clear splay either side which would remove several parking spots, I do not think this is a major priority.</p> <p>We are clearly not alone in having these problems. Do we liaise with other villages to find out how they solve similar problems?</p> <p>The Comm Hall charity plans two years ago involved several stakeholders. If we propose to provide better health and pharmacy infrastructure then the ongoing use of the vacated properties needs to be addressed as part of the overall plans.</p> <p>Do not underestimate the wealth and potential</p>	<p>Noted – this has not received widespread support/comment from the community.</p> <p>Noted – the WNP supports the provision of parking to alleviate pressure on the High Street.</p>

Ref.	Section	Summary of comments	Commentary from Steering Group
		generosity of residents when it comes to funding a new Comm Hall. The village's contribution to war efforts are starkly remembered in our church, war memorial and the wonderful display of crosses each November. Proposals for the dump site remain a key issue for the village as does access to the station. Please keep gnawing on these bones!	Noted – this would be the responsibility of ESCC.
334.		I have always thought it sad that Wadhurst does not have a Village Green or a field that could always be used for Village functions for everyone to attend. The obvious and ideal place is behind the Commemoration Hall. It would only be used a couple of times a year and surely not a great inconvenience to the usual users. An alternative would be to use the Pavilion site with its several football pitches.	Noted – the Parish Council will discuss.
335.		I object to the planning application of 25 new houses on the field at the junction of sparrows green and Cousley wood road. AOONB. The traffic produced would be very dangerous and speeding traffic on the Cousley wood road has already caused serious accidents. 40mph is rarely observed. What could be done to enforce this?	Noted. See Ref 1. Enforcement sits outside the scope of the WNP.
336.		I think all has been covered in the NP	
337.		I think it should be more clearly stated that the NP would NOT support any housing developments on our AONB	Noted – Policy WAD1 has been crafted to support this point but national policy does allow development within AONBs and the WNP must conform to this.
338.		I think the area is already at full capacity and any large future housing developments should be stopped as the village can not cope with the evermore growing population.	Noted. See Ref 1.
339.		I think Wadhurst is surrounded by beautiful countryside to walk - run - cycle. I'm not sure what extra leisure facilities are needed? The surrounding countryside IS there for our leisure and the calming	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
		influence for mental health and that is why we need to save it.	
340.		<p>I would like to see some protection in place for residents in terms of parking. We have two vehicle that have to be parked on the High Street because we have no where else to put them.</p> <p>The carpark only allows upto 23hours and these spaces go quickly. I would like to see resident parking introduced so that we can be assured of parking spaces even when the community holds events. If there are no spaces for us we end up having to park inconveniently or blocking the roads because there is no where for us to go.</p>	<p>Noted – a policy on this has been recrafted.</p> <p>Noted – this would be the responsibility of WDC and sits outside the scope of the WNP.</p>
341.		I would like to see speed limits reduced on the Cousley Wood B2100	Enforcement / speed limits sits outside the scope of the WNP.
342.		Impact of Uplands Community College on local residents in particular, parking. Currently there are not enough on site parking spaces for staff and students. The impact on local residents and businesses is huge. The parking issue is No1 on my list.	Noted – additional parking provision is supported in the WNP.
343.		Improved signals for mobile phones.	Noted – this is considered in national policy.
344.		Improving infrastructure must include better access to and from station. The lack of taxi facility and sparse bus service mean it is largely only accessible by car.	Noted – Policy WAD7 seeks to address accessibility by foot / bike.
345.		In terms of transport, it is a pity that buses don't run through the village on Sundays, as people still need to get to work at the weekend. Hence I feel that this is something that should be addressed if possible.	Noted but this sits outside the scope of the WNP.
346.		It has already been stated but to emphasise the fact that parking is inadequate, the Commemoration Hall is no longer fit for purpose, the Medical Centre is operating in an outdated and too small building. The Green belt must remain untouched.	<p>Noted.</p> <p>There is no Green Belt in the parish. The AONB is protected to a point in national policy but development can be permitted.</p>
347.		It is essential to retain AONB	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
348.		It is of paramount importance that Wadhurst retains its rural character and does not grow extensively or change to become a mirror of the Greater London borough suburbs with all the attendant social problems that tend to come with significant growth.	Noted – the green gaps policy seeks to reduce coalescence and retain local character. A Design Code has now been prepared to influence local character and design.
349.		Keep the shop fascia's in the style of the village and not allow brash signage e.g. Turkish Barber. Stop parking on both sides of the High Street and build a large car park in Uplands	The Design Code has been prepared which will assist here.
350.		Lack of central outdoor play space for small children - swings, slides etc. The existing area is on the outskirts of town at Turners Green. An area in the fields behind Uplands Community College would be more central and could include a much needed picnic area to enjoy the views	Policy WAD18 would provide support for this as recrafted.
351.		Lighting from the station to Durgates needs to be improved - safety issue	This sits outside the scope of the WNP.
352.		Listening to the video prior to this questionnaire there will be no affordable housing. Which if you have to build is desperately needed.	The WNP is not allocating housing. However any strategic allocations will need to provide a % of ah in line with WDC requirements. Policy WAD2 sets out the sort of housing that is most needed at the parish level.
353.		Low cost rentals for local young people instead of supposedly affordable housing	See above.
354.		main concerns are increasing volume of traffic - the road (B2100) past the primary school and coop is continually in a state of gridlock and proposed developments being built nearby on fields that will not add further to this problem.	Noted. The WNP supports proposals that will encourage active travel. See also Ref 1.
355.		Major concern is traffic congestion which is adequately covered	Noted - The WNP supports proposals that will encourage active travel.
356.		More Cycle racks in High Street. New site for Health Centre required	Noted and Policy WAD7 and 9 support this.
357.		More emphasis on parking to enhance the local economy.	Noted.
358.		multi modal /sustainable transport network - not just road traffic	The WNP supports proposals that will encourage active travel.

Ref.	Section	Summary of comments	Commentary from Steering Group
		Positive statements / objectives about wider communities in the Parish Doesn't seem to reflect climate action but needs to be clear in policies	This has been reviewed and is now reflected in the Plan, including notable at Policy WAD4.
359.		Need to encourage full occupancy of High Street shops, identifying gaps in the retail offering, e.g. hardware store	Noted.
360.		Need of swimming pool	Noted.
361.		New build at Lower High Street floods. Before building it was known as Wet Field!	Noted.
362.		No cleaning done of filth and litter	Noted.
363.		No major concerns committed. Great plan!	Noted.
364.		no mention at all about expanding community health services?! This a major issue in the parish!	This is now addressed in Policy WAD18.
365.		None of the recent housing developments or proposed developments help the younger generation to get onto the property ladder and achieve nothing towards addressing the national housing crisis. There is a strong need for Wadhurst to be protected from further developments which will be of no benefit to people who grew up here.	Policy WAD2 seeks to address this.
366.		Not so much policies but Mayfield Lane is not considered within traffic pollution and speed. This road has a continuous flood of vehicles (especially large lorries) and the speed limit is definitely not adhered to and congestion is an issue. Traffic calming at the junction of Mayfield Lane and Station Road would be advisable along with additional traffic calming outside of Sacred Heart School. The speed at which all vehicles and motorbikes travel past Little Park is astonishing and extremely dangerous. Any feedback would be welcomed and suggestions of how this could be achieved, if this is not the correct place to mention.	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
367.		Not sure if this is relevant to the NP BUT we do need better, more modern premises for our GPs. In order to accommodate the care of current and new residents we need better premises to attract good GPs and to encourage our current GPs and nurses to stay.	Noted.
368.		NP should include intent to retain a secondary school at a site in the heart of the village. Once that goes and is replaced by 150 new builds, Wadhurst becomes a commuter new town with no identity. It would be interesting to see a ratio of the age of dwellings. If certain sections of the village could retain a proportion of dwellings over 100 years old that may help.	Noted however this would fall outside the scope of the WNP – it is the remit of ESCC as the Education Authority.
369.		Pedestrian/ Traffic Light Crossing required in Mayfield Lane and High Street. No parking in the High Street except for deliveries	Noted – this would be the responsibility of ESCC as the Highways Authority. Noted – Policy WAD9 seeks to address parking issues as far as can be influenced.
370.		Please ensure right of means of access for all in proposals of public space/public buildings, e.g elderly and infirm & wheelchair users, flat pathways/crossings in areas with shops/public amenities. I would also like to add that I grew up in Wadhurst I'm now 40 years old the road network through and surrounding the village could only just about cope even back then, they've kept building but the infrastructure was never upgraded to cope in that time! I now live in Ticehurst and we have the same issues being experienced by Wadhurst, Hawkhurst is the same, these plans should be part of a much larger, wider, highly coordinated and publicised effort!	Noted – this is covered in both national policy and reflected in the Design Code.
371.		Prevent parents parking close to the junior school, currently all over the place in Durgates on corners near crossings etc.It should be at least 400 yards away	Noted – active travel is supported in the plan but the Plan cannot stop people using their cars.

Ref.	Section	Summary of comments	Commentary from Steering Group
372.		Protected view status should also be sought to protect the views along Balaclava Lane which have stunning vistas for miles over what is currently traditional farmland (but where there appear to be two speculative planning applications which will despoil these ancient Wealden views as well as create traffic havoc along the narrow lane and dangerous potential accesses via the B2100 and Oscar's hill at either end).	See Ref 244.
373.		Reasonably comprehensive. Not aware of any major omissions.	Noted.
374.		Residential development and associated parking on the High Street should be addressed. Congestion occurs due to Lorries/Deliveries - should be early morning to avoid congestion. 2 hour parking restriction in the High Street required. School traffic should park in the school. Traders should park in the car park and off load. Issue of taking away parked cars on the High Street and then seeing speeding traffic. Need more variety of shops in the High Street (Electrical and Hardware shops were a loss). Social housing mix with Executive homes does not work. Wadhurst should retain all its green spaces. Developments cause flooding.	Noted – WAD9 seeks to address this. Enforcement and speeding outside WNP scope. Noted – green spaces are included where these can be justified against national criteria.
375.		Restrict speed of traffic through the village from Foxhole Lane.	Speed limits sit outside WNP scope.
376.		Road safety (speed limit lowered to 20 mph) leading to and around schools.	Speed limits sit outside WNP scope.
377.		Safe non-car travel options to get from Wadhurst centre to the train station would help me leave my car at home and commute via train instead and would also mean less cars going through wadhurst village centre to the station. Wider, consistent paths or a shuttle service perhaps.	Policy WAD6 seeks to support active travel.

Ref.	Section	Summary of comments	Commentary from Steering Group
378.		Seems to have covered most things, but internet infrastructure improvements may impact the area even if just temporarily.	Noted.
379.		Shops like a bakery or fishmonger would ensure that the high street has more or less everything a person could require	Noted but outside the sphere of influence of the plan.
380.		shops should be discouraged from leaving lights on at night	Noted – the Dark Skies policy seeks to restrict light pollution. A measure as proposed would require local engagement with shopkeepers and goodwill.
381.		Stated in my answers so far, especially the limits on the protected areas.	Noted.
382.		Strong reiteration of need to protect greenfield sites	Noted.
383.		Suggest a car park north of the High Street is required to lessen through traffic	Noted.
384.		thank you please have the environment, enhancing the AONB diversity and working toward sustainable, less polluting, greener ways of living in Wadhurst	Noted
385.		The aims are good but will you keep to them,I look out of my window and see people with stamina,playing bowls,cricket,football in a beautiful green field with views across Snape Wood.long may it last.	Noted.
386.		The area around the Jardin d'Aubers, and the wildlife area may have been included as places to keep safe but I could not tell from the small map if they are	Noted – maps have been amended.
387.		The area simply cannot sustain new homes its as simple as that, every new road destroys what little countryside we have left!	See Ref 1.
388.		The fact that we don't want any further development is being ignored .	See Ref 1.
389.		The major cause of traffic blockage relates to school traffic: the waiting buses for Uplands' children and the parents on-road parking (both sides) on the B2099, at the Primary School. Land should be acquired for a bus park: either behind Uplands School, or behind the	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
		commercial development opposite the War Memorial. The B2099 could be widened with a screened lay-by in this area for Primary School parents. The blockage caused presently at the Sparrows Green junction is dangerous. This is worthy of a mini roundabout.	
390.		The map shown does not include the whole of the parish and therefore these principals are apparently not extensive enough	Maps amended.
391.		The need for assisted housing and the lack of capacity in local amenities to service any new developments.	Policy WAD2 explores local housing need.
392.		The need to create wildlife corridors within Wadhurst with leisure activities to promote them eg designated nature/wildlife trails through Wadhurst and environs	Policy WAD13 seeks to address this and includes a map showing strategic corridors.
393.		The new developments WILL NOT WORK. They will destroy Wadhurst, and ancient village on the Weald.	See Ref 1.
394.		The power lies with the District and Government and arbitrary housing targetsNP is therefore a pretty hopeless project	See Ref 1.
395.		I wanted to say that some existing amenities are not fit for purpose, so protecting them sounds like it will saddle us with amenities that are both outdated and prevent us from replacing them. On this question, I think there needs to be urgent consideration of young peoples' lives within the parish. Teenagers should not be considered a nuisance nor should they be pushed out of the village, and yet there is no provision for them. We benefit from having an excellent secondary school - we should make sure their social lives are also valued.	Noted but WAD18 makes provision for this.
396.		The reason of moving to wadhurst was to embrace a busy working Village (small town) environment and community. In my opinion developing wadhurst into a bigger town would be detrimental to its community and environment and actually on an economic basis by detrimental to house prices!	See Ref 1.

Ref.	Section	Summary of comments	Commentary from Steering Group
397.		The speed of traffic requires action, speedimits should be 20mph in the village and close to it and 30mph on B2100 through Cousley Wood.	Noted but outside WNP scope.
398.		The village is a small rural community. Traffic has increased substantially in the last five years and further development will make this issue worse. There is often no parking so a simple trip to see the GP can be extremely difficult, simply there isn't the infrastructure to support the developments we are seeing proposed. This is an area of Outstanding natural beauty and the various proposal are destroying the countryside. Climate change is real and these various developments will destroy a beautiful area - we will never get it back. The only people this benefits is the very wealthy property developers. Please use brownfield sites - don't destroy this community for our children.	See Ref 1. Policy WAD1 seeks to prioritise use of brownfield sites, where these exist.
399.		There are always cars, vans, buses, trucks driving along the pavement on Sparrows Green road as the road is too narrow for vehicles to pass at busy periods. I have seen this happen too many times to count, and this is when children are walking along the pavement to school. Also, traffic is fast along this road and at some points the pavement is so narrow, a vehicle passes you less than a metre away at great speed. It's dangerous and frightening.	Noted.
400.		There has been far too much development of Wadhurst on a commercial basis already. The village does not have the infrastructure to support further development. Any further development would change the dynamic of the village to more of a town feel alienating current resident. Further development would likely lead to an increase in antisocial behaviour and crime as has already been seen in recent years.	See Ref 1.
401.		There is no mention of the poor mobile phone signal in parts of Wadhurst	Noted, although this sits outside the scope of the WNP.

Ref.	Section	Summary of comments	Commentary from Steering Group
402.		There needs to be some mutual resolution of the issues surrounding the commemoration hall, as it is under utilised and under resourced	Noted – the PC will explore this.
403.		<p>This all sounds perfect but unfortunately I am not at all confident that you will adhere to the commitments you make in this form. Firstly I fear that development will end up being permitted in areas of outstanding natural beauty where such development will ruin the view and appearance for ever. Secondly any further housing development in Wadhurst would not be possible without making the traffic congestion problems, which already beset our daily lives, unbearable. Wadhurst is a medieval village and its layout makes it impossible to modify existing roads to improve traffic problems. Adding yet more traffic will just compound the problem. Wadhurst is exceptional and needs to be treated as such by exempting itself from the new housing quotas being dictated from central government. No one comes down here from Westminster to see what the problems are. All they do is incentivise the council with cash to build ever more houses in an area that cannot accommodate any more. As the Council in charge of protecting this area you have a colossal responsibility to protect and preserve it for the future.</p> <p>You also say nothing of areas for recreation...there is nowhere in Wadhurst where one can walk freely other than on the roads, many of which have no pavements and are therefore extremely dangerous, or on muddy, narrow, overgrown footpaths. The footpath down from the church to Blacksmith Lane was one just such impassable footpath until we took it upon ourselves last month to go and 'hedgecut' the length of it. We already pay extortionate council tax charges which should cover such maintenance.</p> <p>There is room however for 'positive development' in Wadhurst that would benefit everyone...The fire</p>	See Ref 1.

Ref.	Section	Summary of comments	Commentary from Steering Group
		<p>station is due to close. There is a building already on that site which could be converted into a new health centre with ample parking. Part of the parking on that site could be designated for cars associated with Wadhurst Primary School which would help to alleviate congestion on the roads around the school at drop off and collection times and make it much safer collecting children. Ben Greig's garage which I believe is going to up for sale soon should be made into a residents car park for Sparrows Green Road with a permit holders scheme and a docking area for recharging electric vehicles thereby alleviating congestion on Sparrows Green Road by reducing the number of parked cars. Another suggestion would be to turn the 40 acre site at the heart of the village, which extends from the High Street all the way across to Primmers Hill and Blacksmiths Hill, into a 'wild' park for Wadhurst residents. People could exercise, walk their dogs and enjoy the stunning views. It would be amazing! Wadhurst is incredibly special and you bear a huge responsibility to safeguard it for the future and we, as residents put our trust in you and pay you to protect and enhance the area that we live in.</p>	
404.		<p>This is a mediaeval structured town and already the layout and infrastructure is overstretched to beyond capacity. It has become an inappropriate environment to be able to deal with a growing population for the points already raised. Before extensive houses are built we need to upgrade the current infrastructure to cope with current needs before multiplying the shortfalls in the future. Future generations will be affected and Wadhurst an area of outstanding beauty will no longer meet this criteria. Perhaps we need to explore and upgrade older disused buildings first.</p>	See Ref 1.

Ref.	Section	Summary of comments	Commentary from Steering Group
405.		to add to well-being by improving bike lanes both reducing congestion / parking and enhancing well-being	Noted.
406.		To ensure brownfield sites are within the planning boundary and NOT in AONB areas outside the Parish planning boundaries, eg: Marling House , Station Road	Noted, although brownfield sites can exist outside the boundary. Policy WAD1 supports the reuse of brownfield sites in particular and also directs any new development to within the settlement boundary.
407.		To support lower income people and families, creating a formal food bank and wellbeing support which is easily accessible.	Noted – the PC can consider this point.
408.		Traffic calming on both the Station Road end of Wadhurst and Tapsells Lane	Noted but outside scope of the WNP.
409.		Traffic safety for children in particular	Noted and the Plan has been amended to include policies seeking to tackle this.
410.		Traffic speed especially on sparrows green road and Cousley wood roads and the 'rat run' use of this road	Noted. Speeding sits outside scope of the WNP.
411.		Traffic speeds exiting the village towards Ticehurst. Cars have a tendency to accelerate once they are past Uplands. Often going 60 way before the speed change.	Speeding sits outside scope of the WNP.
412.		Uplands is getting too big with no parking for pupils or busses the car park by the grey hound pub is always full of school cars and the road should not have school busses on it there should be a coach park in the school	Noted – this is a conversation to be had with the school.
413.		Uplands school struggles to recruit enough students which puts the local resource at risk. Better public transport links would support student recruitment.	Noted although public transport provision sits outside the scope of the WNP.
414.		Wadhurst needs protection from housing developers who's soul aim is to destroy the AONB in the pursuit of money	See Ref 1.
415.		Waters Reach has already given the precedent for building in the AONB on a greenfield site - it was a cited view and yet still built on. What is the point of the village development boundary if it is going to be ignored?	See Ref 1.

Ref.	Section	Summary of comments	Commentary from Steering Group
416.		We are short of green spaces..we need to highlight this	Noted – the Plan has been amended to acknowledge this and protect, where possible, those that meet the criteria to do so.
417.		We need our recycling centre to be reopened please.	Noted.
418.		We need to provide a regular bus service which would link up Wadhurst with Bewl Water and National Trust properties for example, Scotney Castle and Batemans. People who do not drive or have access to a car are unable to visit these places. The provision of a bus would enable young people who would like to go to Bewl In the school holidays but can't do so unless a parent with a car is at home.	Noted although public transport provision sits outside the scope of the WNP.
419.		We talk about the AONB, but there is no mention of protection for wildlife. All housing developments should have green/wildlife friendly spaces included within them. The housing developments themselves should be as environmentally friendly and sustainable as possible.	This has now been included within Policy WAD13 and Policy WAD4. The Design Code has now also been completed which embeds this.
420.		When I was young you could play in the street or across the fields. That is no longer safely possible. I would like to see a commitment to provision for young people written into the objectives. If the majority of young people move away who will provide the services the village will need in the future? Carers, shop workers, hairdressers, gardeners, cleaners, firefighters. If in the future people have to drive miles to work,(that's if they can afford to run a car) that will defeat the sustainability objectives.	Noted. The policies collectively seek to try and address this.
421.		Wild verges should be preserved to help wildlife and not be mowed in spring!	Noted – this is included in Policy WAD13.
422.		With climate change accelerating, It's time to revive the idea of Wadhurst as a 'transitional' town, with a green philosophy and an inward focus on local investment and employment.	Noted. A sustainability appraisal has been prepared to accompany the Plan which demonstrates that the policies individually and collectively promote this ethos.
423.		Within the Wellbeing & Leisure objectives you should change "retain and enhance" to "EXPAND and enhance" existing community facilities. The present	Noted.

Ref.	Section	Summary of comments	Commentary from Steering Group
		words might be a hostage to fortune if a particular facility became unviable/unsustainable. We need to plan for future needs not past ones and any provision that needs to be replaced/expanded should not be restricted to a present site. (E.g. the WPC proposal for a health facility at the Fire Station would not be possible since it is being moved from the present site which according to this section would have to be RETAINED at St George's Square)	
424.		Wrong sort of housing being built Small affordable housing required, not 5 bed detached !	Policy WAD2 seeks to address this at the Parish level.
425.		you have inserted your opinions into the consultation data obtained through earlier public consultations. You appear to be trying to stop all development and so stifle the village.	The WNP is not seeking to stop development, rather influence it.
426.		You have mentioned community facilities, one priority would be for areas for teenagers/young adults to socialise safely. This may be included in the detail.	Noted and this is considered in recrafted WAD18.

Statutory consultees - Comments received at Pre-Submission (Regulation 14) Phase I Consultation and proposed responses from the Steering Group

Representations (Rep.) received from:

1. Environment Agency
2. East Sussex County Council
3. Historic England
4. National Highways
5. High Weald AONB
6. Kent County Council
7. Natural England
8. South East Water
9. Southern Water
10. Tunbridge Wells Borough Council
11. Wealden District Council

Table 1: Comments are listed by paragraph number / policy, the Ref refers to the respondent number, with a summary of the comments. The fifth column provides a commentary from the Steering Group to indicate how the comment was taken on board and how this has been reflected in the next version (Regulation 14 Phase II) of the Plan.

Note that the Phase I version of the WNP that these comments refers to dates June 2021 and can be found in the Evidence Pack. The policy numbering is different to the policy numbering in the Regulation 14 Phase II version.

Substantial comments from Wealden District Council are contained in Table 1. Table 2 includes the detailed comments received.

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
			It is also important not to give the impression that the Plan is anti-development. Neighbourhood Plans cannot block all housing development or even all major development sites.	Noted. This has been reflected in the tone of the amended Plan.
431.	Objectives	2	Objective: Limit future traffic generating major housing development' – Suggest amended so that it reads 'Mitigate traffic-related impacts of new major housing development' as the only way to limit traffic generating major housing development is to not have any development at all.	In light of all comments received, the objectives for the WNP were amended. The one relating to this area as: Objective 2 – Getting Around: To address local transport issues, including traffic and parking issues and promoting sustainable transport options by improving connectivity to facilities within and beyond the Parish by integrating and, where possible, extending the network of footpaths, cycleways and bridleways.
432.	General	2	Health and well being comments – more fully set out how the policies of the plan will influence the health and well being of local people.	This has been reflected in the amended plan, within the vision and objectives and the policies.
433.	General	6	It is noted the Plan often refers to 'countryside footpaths'; however, as Wadhurst Parish has a couple of Public Bridleways and one Restricted Byway, which could be valued also by walkers and cyclists, it is recommended the Plan is revised to refer generically to PROW whenever considering rural paths, excepting those that are or could be part of the road highway network.	Noted and this has been amended.
434.	General	7	Natural England does not have any specific comments on the draft Wadhurst Neighbourhood Plan.	Noted.
435.	General	8	No specific comments beyond general advice.	Noted.

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
436.	General	10	<p>The document should be updated to take account of the recently revised NPPF.</p> <p>Reference to 'Brownfield Lands', 'Brownfield sites', 'Greenfield Sites' and 'Greenfield lands' – I think it would be helpful to use consistent terminology within the document and would suggest using 'Brownfield site' and 'Greenfield Site'.</p> <p>Also in terms of the 'High Weald Area of Outstanding Natural Beauty', this is abbreviated a number of different ways – HWAONB or High Weald AONB. I would suggest using the latter as this is how it is generally referred to in other documents.</p> <p>Text within the document – the policies are written in quite small italics text and is not very clear to the reader. It may be good to try alternative ways of making the policies clearer such as using standard text but shading the complete policy wording so that it differentiates the policy from the rest of the text.</p>	<p>This has been undertaken within the amended Plan.</p> <p>This has been reflected in the amended Plan.</p> <p>This has been reflected in the amended Plan.</p> <p>This has been reflected in the amended Plan.</p>
437.	General conformity with Local Plan	11	<p>The neighbourhood plan should reference the relevant adopted development plan policies in the explanatory text to each policy. Any</p>	<p>This has been reflected in the amended Plan aside from the inclusion of references to the Objectives of the High Weald AONB Management Plan. Whilst these references are not required, they are considered to provide helpful context to those who will be using the Plan and assist in the AONB Unit in delivering their objectives. It</p>

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
			references to policies that do not form part of the development plan should be removed.	is noted in the introductory sections that the AONB Management Plan is not part of the Development Plan for the District.
438.	Justification / Supporting Text / Evidence Base	11	The plan's conciseness is a positive. However, the policies within the Plan require further supporting text to explain and justify each of the policies.	This has been addressed in the amended Plan.
439.	Repetition	11	A number of policies repeat higher order policies or guidance documents (e.g NPPF, National Design Guide, High Weald AONB Management Plan) that are already taken into account through planning decisions.	The Plan has been amended to address this comment.
440.	Legibility (paragraph referencing / coloured text)	11	<p>The numbering of paragraphs in the neighbourhood plan is unnecessarily complex and confusing.</p> <p>The different coloured text is hard to read in the plan and not suitable for those with sight impairments.</p>	This has been reviewed and the Plan has been made clearer and accessible.
441.	Promoting sustainable development	11	<p>A number of policies such as PLE4 and PDC7 within the plan seeks to prevent major development coming forward or places requirements on such development to address pre-existing issues (e.g dealing with existing traffic issues that do not directly relate to development itself).</p> <p>Other environmental designations (e.g. green gaps) seek to further limit the supply of</p>	The Plan has been amended to be positively worded and to support sustainable development – to do this it emphasises the importance of conserving the High Weald AONB landscape and directing development towards those parts of the Parish that have access to local services and facilities. The policies also seek to ensure that development does not detrimentally impact the character of the individual settlements of the area. Traffic congestion is an issue in the Parish and the Plan includes policies to ensure that, subject to their scale, location and nature, development proposals fully consider and mitigate as appropriate their impacts on these already stressed routes.

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
			<p>potential housing sites coming forward to meet the needs of the local community in Wadhurst (Other areas of the plan require development to come forward on brownfield sites alone despite the fact that there are very few available brownfield sites in the Parish.</p> <p>Neighbourhood plans must have regard to national policy and the Government's requirements to deliver sufficient homes.</p>	
442.	Policy EN1: To conserve and enhance the AONB natural environment	1	Include wording: ' conserve and enhance ecology, most notably fields, trees and hedgerows, and reinstate historic field boundaries '	Noted.
443.	EN1: The HWAONB and Countryside Protection	3	Support.	Noted.
444.	EN1: The HWAONB and Countryside Protection	5	Some overlap with national policy. Concern about Design aspects	This has been amended and the Wadhurst Design Codes prepared to form an integral part of the Plan.
445.	Policy EN2: Conservation of the natural environment, ecosystems and biodiversity	1	We support this policy with regard the protections outlined for the water environment.	Noted. This will be retained in the amended version of the plan.

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
446.	EN3: Protection of Green Gaps	5	Green gaps are normally areas of land between different settlements identified to prevent coalescence.	Noted. Additional work has been undertaken to further evidence the inclusion of the Green Gaps, which are considered to be vital in terms of restricting coalescence and retaining the individual character of each settlement within the Parish.
447.	EN3: Protection of Green Gaps	5	The Council raises an objection to the proposed Green Gap designations set out in the draft plan.	Noted. Further work was undertaken to provide additional evidence to justify inclusion of the Green Gaps, which are considered to be vital in preventing coalescence between the individual settlements that comprise the Parish. The NPPF or Development Boundary has not protected HWAONB sites to date (e.g. Waters Reach, Old Station Road and Wadhurst Place developments on HWAONB). WDC has not had a 5 year housing land supply since 2015 and this has led to speculative windfall housing applications and subsequent permissions granted. Therefore, there is no protection for HWAONB / Greenfield sites in Wealden currently which is totally against residents wishes in order to maintain a 'village' feel and distinct settlement communities (over 90% of resident respondents agreed with the Vision statement in the Regulation 14 feedback survey).
448.	EN4: Protection of views	3	Support – add in additional descriptions.	Noted. This has been added to the new Plan (now Policy WAD15).
449.	EN4: Protection of views	11	Need additional justification. All views are across sites that have been submitted in to the Call for Sites.	The views were identified before publication of the SHELAA 2020. None of the sites have planning permission. The views could be incorporated into any proposals in any case. Further justification to be provided as well as better mapping.
450.	EN5: Local Green Spaces	3	Support.	Noted and this has been retained into the new WNP (Policy WAD16).

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
451.	EN5: Local Green Spaces	11	<p>Concerns raised about specific spaces</p> <p>Wadhurst Playing Field LG7 – no recreational value, not a recognised designated wildlife site, no landscape function of note, does not contribute to local character, not a tranquil space.</p> <p>Turner’s Green LG11 / LG12 – not considered to be historically important.</p> <p>Bewl Water LG13 – too large, remote from Wadhurst and LGS would be restrictive.</p> <p>Stone Cross Farm LG16 – not considered to be demonstrably special.</p>	<p>Further justification has been provided about each of the spaces. The mapping has also been improved.</p> <p>Recreational - because of its views and levelled grassland it is used extensively for walking and dog walking. The wooded areas are used by children to play in. In terms of wildlife, the site does not need be a Local Wildlife Site to warrant protection. From a landscape perspective, it is the highest point in Wadhurst with views. It is located opposite a new estate of 38 x 3/4/5 bedroom homes and 17 apartments of Wadhurst Place (without amenity space) and the new 5 apartment development of the old Best Beech Pub). There is no impact from the road as it is well above the road which is not that busy and has a significant wooded section in front of the road.</p> <p>The space was the location of the last (public) bare knuckle boxing match (leading to the Queensbury Rules for Boxing. For many years there has been a formal plaque commemorating the site in the Sparrows Green Pavilion only 100 yards away and another commemoration plaque is on the entrance to the site.</p> <p>The SG consider that the site is not too large at 7.25 ha. The LGS designation would still enable development that is not inappropriate in planning terms. It is very well used by locals for recreation including walking.</p> <p>The site has been raised by the community via the local engagement and is considered to be demonstrably special. The site has been used for many years as the Parish Annual Bonfire and Firework display (as in Nov 2021).</p>

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
452.	EN7: Protection of Dark Skies	5	This policy is supported but you will need to include supporting text setting out the evidence base (we can provide a map) and also explain why dark skies are important to the community and the AONB. It is not sufficient to say that development proposals would lead to a measurable deterioration in Sky Quality Meter (SQM) readings – what is the impact on the landscape, people and wildlife?	Noted – this additional detail has been added to the amended plan.
453.	DC1: Historic Environment and Conservation Areas	3	Support.	Noted and this policy (WAD5) has been improved to include criteria against which to designate non-designated heritage assets and identifying some of these in the Parish.
454.	Policy DC8: Brownfield Sites	1	We are pleased to see that where development takes place, this policy supports the reuse and redevelopment of previously developed land. Assuming that the site comes forward in line with the Sequential Test Approach for flood risk, developing on brownfield sites can provide the opportunity to clean sites up hence providing long term environmental improvements such as to water quality. Any development on brownfield sites will need to ensure that they have followed appropriate procedures to ensure protection of the	Noted and the use of brownfield sites will be retained in the amended version of the Plan.

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
			environment and you may wish to add this to the policy.	
455.	Policy DC9: Conservation Areas	3	Support.	Noted and retained in the amended version.
456.	Getting Around Section	2	Focus should be on improving sustainable travel options to make it a more attractive option than using the car, particularly for shorter, local journeys. Future housing in the parish should be accompanied with good quality sustainable links and connections to the village core to encourage walking and cycling trips for shorter local journeys and reduce car borne development generated trips.	The Steering Group agrees and this was ultimately included within Policy WAD7 of the Reg. 14 Phase II Version WNP.
457.	Getting Around Section	10	We note the reference to improvement of access/recreation links – pedestrian and cycle between Wadhurst and Bewl Water, which straddles the boundary with Tunbridge Wells Borough Council. The Council would be supportive and would be happy to work with Wadhurst Parish Council on such projects.	Noted.
458.	GA1: Road and pedestrian safety with sustainable access	2	Regarding the requirement of GA1 to ‘demonstrate how the proposed development will maintain local footpaths’ it will not be possible to impose a Planning Policy which makes this particular requirement. As set out in paragraph 1.5, it is suggested that this paragraph is removed from policy PGA1.	Noted and this has been removed from the subsequent policy.

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
459.	Policy GA1: Road and pedestrian safety with sustainable access	2	All applications for major development have to provide a Transport related document as set out in ESCC guidance.	The provision for such documents has been included in the WNP within what is now Policy WAD8. This includes additional detail about which particular junctions and roads experience traffic related issues and the impact of which should be considered as part of any new development (subject to scale, nature and location).
460.	Policy GA2: Traffic Congestion and pollution	2	It is advised that all major applications seek pre-application advice from the highway authority to agree a scope for such documents to formulate the development proposal with appropriate background information and evidence (trip data, police crash data, census data as examples). ESCC are the responsible authority to advise and assess this information.	Noted.
461.	Rights of Way	2	Have existing public footpaths been considered in terms of the potential to upgrade them to public bridleway or cycle tracks? A number of public footpaths are hard-surfaced, part way to reach Bewl Water (main tourist attraction), for example. While a change from footpath status would require landowner and user group consultation, there are quiet lanes potentially suitable for horse riding or cycling that also connect to Bewl Water such as Little Butts Lane and Blacksmith's Lane.	<p>This would sit outside the scope of the NDP planning policies. Policy WAD7 addresses this to an extent, e.g.:</p> <p>The provision of new, or the enhancement of existing, cycle and pedestrian routes that are, where feasible, physically segregated from vehicular traffic and from one another will be strongly supported. Such routes should be of permeable material and ensure that access by disabled users and users of mobility scooters is secured.</p>

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
462.	Policy GA3: New development parking	2	<p>Parking should comply with the ESCC car parking standards.</p> <p>Electric Vehicle charging points should be provided per plot for new housing and can be communal for flats or affordable housing schemes.</p> <p>Reference should be made to the provision of cycle parking as well as vehicular parking.</p> <p>Strongly suggest making a reference to ESCC's emerging Local Cycling and Walking Infrastructure Plan (LCWIP).</p>	<p>This has been added to the policy (now WAD9)</p> <p>Noted and added (although this is a national requirement now).</p> <p>This has been added in the policy (WAD9).</p> <p>Added into the supporting text for Policy (now WAD9).</p>
463.	GA1: Road and Pedestrian Safety with Sustainable Access, GA4: Adequate Infrastructure Capacity to support major development proposals and Policy DC7: Major Development	5	<p>These policies are likely to be considered too restrictive by an Examiner.</p>	<p>Noted – these have been significantly reviewed within the amended Plan and following additional evidence collection by the Steering Group, including an independent health check of the Plan.</p>

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
464.	Policy LE2: Rural Developments	2	It is important to highlight the fact that that the conversion or extension of existing buildings may have impacts on biodiversity e.g. bats or barn owls in roof space or old farm buildings. We would therefore suggest that the following is added to the list of conditions to be met: <i>'that any impacts on biodiversity can be mitigated or compensated'.</i>	Noted. The policies have since been consolidated and this requirement is included within Policy WAD13.
465.	LE2: Rural Developments	5	Trying to limit domestic conversions would be contrary to national policy.	Noted. This policy has been amalgamated into other policies, notably WAD1 and amended to reflect the comments.
466.	Policy LE4: Tourism	2	Include reference to biodiversity impact.	The amended policy (WAD11) supports Rural Tourism, which by definition seeks to ensure that negative impacts on the environment are minimised / avoided.
467.	Policy LE4: Tourism		References to "are unlikely to have a detrimental impact on biodiversity" should be amended to "will minimise impacts on and provide net gains for biodiversity" to be consistent with the NPPF and Environment Act 2021.	The amended Plan include a specific policy on biodiversity which addresses this point.
468.	LE5: Infrastructure support for businesses/ services/ homes	9	The NPPF (2018) paragraph 28 establishes that communities should set out detailed policies for specific areas including <i>'the provision of infrastructure and community facilities at a local level'</i> . Also the National Planning Practice Guidance states that <i>'Adequate water and wastewater infrastructure is needed to support sustainable development'</i> .	Noted, although this would be addressed at the strategic level via the WDC Local Plan.

Ref.	Page/ Para	Rep.	Summary of comments	Commentary from Steering Group
469.	Policy LG13	10	Of note is the proposed designation of the Bewl Reservoir Recreation Area as a Local Green Space – LG13, which again we would support and would be happy to work with Wadhurst Parish Council as necessary in relation to this.	Noted. This has been retained in the amended Plan, with additional supporting evidence provided.
470.	Community Aspirations	6	The list of Community Aspirations (pp. 93-106) includes a number of potential schemes in addition to improving the maintenance of local paths. Funding such improvements can often prove key to them being realised and the Plan recognises any accrued monies through the Community Infrastructure Levy could be used to this aim - the Service considers this a further positive aspect of the Plan. Should there be any enthusiasm to develop onward connection in Kent, the KCC Public Rights of Way and Access Service would welcome opportunity to work with Wadhurst Parish Council and / or East Sussex County Council to realise these ambitions for the benefit of both parishes.	Noted.

Table 2: Detailed comments from Wealden District Council

Ref.	Para / section	Summary of comments	Commentary from Steering Group
471.	SEA	The need for an SEA or HRA has now been screened out. However, regardless of this outcome we still recommend that the neighbourhood plan group produce a Sustainability appraisal as a means to demonstrate that the NP 'contributes to the achievement of sustainable development', which is one of the Basic Conditions the NP must pass at examination	Noted – a Sustainability Appraisal will be prepared by the group to support the Plan.
472.	Health check	Recommend a health check of the Plan is undertaken.	This is being organised.
473.	Order of content	Various comments about where text should be placed in the document.	This has been addressed.
474.	Factual information	Various comments providing factual information to be reflected in the plan – e.g. reference to Local Plan dates, amendments to the Conservation Area etc.	These have been addressed.
475.	High Street traffic	The Parish Council should work with the District Council and East Sussex County Council to test whether future growth can be achieved in Wadhurst taking into account infrastructure requirements and the existing situation.	The Steering Group invited ESCC Highways to look at strategic solutions to the High Street traffic congestion with WPC/NPSG in Sep 2021. So far ESCC Highways have not agreed to dates provided. WDC Planning have also been invited at same session but have declined.
476.	Design	Avoid repeating existing guidance. Plan should perhaps concentrate on local distinctiveness of Wadhurst settlements. The High Weald Design Guide is already a material consideration	Design Codes for Wadhurst are being developed that are locally specific to Wadhurst and will be incorporated into the NP and the Policy in the next iteration of the Plan. This is not what it states on the WDC website under the planning policies section, it says it is a guide rather than a material consideration (like the management plan, which was adopted by WDC on 21/3/2019.). Wadhurst wish to adopt the HWAONB design guide so that it too is given the same material consideration. Even

Ref.	Para / section	Summary of comments	Commentary from Steering Group
			more specific local design codes will be developed as part of our project with Create Streets, in line with National Policy.
477.	Brownfield Sites	Are there any available brownfield sites in Wadhurst?	Yes, detail provided in section 5 of the Plan.
478.	Vision, Aims and objectives	Recommendations on including additional topics e.g. heritage.	This has been reviewed and objectives amended to reflect this.
479.	Overlapping policies	Some of the sections and policies overlap	Noted and this has been addressed.
480.	Policy wording	Should be more positively written.	Noted and this has been reviewed.
481.	NPPF	This has been updated and the Plan needs to reflect new numbering.	This has been reviewed.
482.	GA1	The requirement to ensure existing traffic levels are maintained is not reasonable. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (NPPF para 111). A blanket requirement to maintain traffic levels regardless of impact on highway or road network is inconsistent with national policy and would be highly restrictive.	This has been reviewed for the amended Plan.
483.	GA2	outside the remit of a neighbourhood plan to dictate the documents that are required to accompany a planning application.	Noted.
484.	GA3	This policy will increase parking provision within Wadhurst in excess of the ESCC Standards.	Amended to align with ESCC Parking Standards.
485.	LE1	Point 4 requires a development to provide 'some employment or community use benefits'. However, is this realistic where a building has	Noted. Policy has been amended in to WAD10.

Ref.	Para / section	Summary of comments	Commentary from Steering Group
		been vacant for 1 year and actively marketed for employment uses for 6 months	
486.	LE2	The structure of this policy is confusing as it supports three separate types of development change of use, extensions (to certain uses) and bringing heritage assets into viable use but sets them out as criteria. Suggest this policy is reworded or split up.	The policy has been amalgamated into other parts of the plan, e.g. WAD1.
487.	LE3	This policy appears to relate specifically to the high street rather than local economy more generally. Retail frontages for Wadhurst are not defined on the 1998 Wealden Local Plan and therefore the neighbourhood plan should provide a map to indicate what areas the policy applies to. This	Consolidated into WAD10 and maps provided.
488.	LE4	Various comments seeking additional clarity on the purpose and justification for the policy.	This has been reviewed and a new policy WAD11 created.
489.	LE5	Comments on scope and clarity of the policy.	Amended to address points raised.
490.	EN1	The neighbourhood plan should concentrate on local distinctiveness and what makes Wadhurst special. This would help mitigate harm through good design, siting, scale of development and direct development to less sensitive locations, rather than try to anticipate and prevent development through such a restrictive policy.	All policies relating to Design to be amalgamated and Design Codes developed to underpin these.
491.	EN2	The policy relates to the natural environment, ecosystems and biodiversity. It is therefore not clear why heritage assets have been included. Remove reference to heritage assets.	Noted. Heritage has been separated out.
492.	EN3	WDC does not support the proposed GG designations for the reasons already provided above.	Noted. This is discussed in Table 1.

Ref.	Para / section	Summary of comments	Commentary from Steering Group
493.	EN4	Comments on views (see table 1)	See table 1.
494.	EN5	Comment on local green spaces in table 1	See table 1.
495.	EN6	The open space standards for new development to set out in this policy are set out in the main body of the Open Space Study at para 6.7 of the open space study report. This evidence base is currently being reviewed as part of Local Plan production and will be available early next year.	Noted.
496.	EN7	The explanatory text could be expanded to explain why dark skies are important to the character of the area and therefore why a policy is justified.	Noted and amended.
497.	DC1	Generally repeats national heritage policy. Consider removing.	Noted. This policy was reworked into Policy WAD5.
498.	DC2	Remove repetition.	All policies relating to Design to be amalgamated and Design Codes developed to underpin these.
499.	DC3	The existing development boundary included in the neighbourhood plan is now out of date. The development boundary will be reviewed through the Local Plan and updated where necessary as part of the Local Plan process. This will of course include accounting for development that has taken place since the 1998 boundaries were first drawn.	Policy intent amalgamated into WAD1 and boundary updated.
500.	DC4	Repetition of existing guidance.	All policies relating to Design to be amalgamated and Design Codes developed to underpin these.
501.	DC6	This policy will need to be in general conformity with the Affordable Housing Local Plan to meet the basic conditions. This policy restates the	The policy has been amended to reflect locally specific housing needs for the Parish.

Ref.	Para / section	Summary of comments	Commentary from Steering Group
		existing strategic policy but is less specific about the appropriate affordable housing mix. A new Strategic Housing Market Assessment report will be published in the next three weeks that will provide the most up-to-date evidence on housing needs.	
502.	DC7	This policy seeks an effective prohibition on all major development due to existing traffic and parking issues. This approach is unreasonable and would be unlikely to pass an examination and should be deleted. The NP must have regard to the NPPF's emphasis on the need to deliver sufficient homes and the need to achieve sustainable development. These are basic conditions that must be met.	This policy has been removed.
503.	DC8	Some windfall developments may come forward on greenfield land such as rural exceptions sites, which has support of national policy. Point 6 does not have regard for national policy. The policy does not address brownfield sites beyond the development boundary.	Utilising brownfield land is now included within WAD1.
504.	DC9	Traffic congestion is not relevant to assessing heritage impact and can be picked up in other policies. Delete point 4.	It is considered that the amount of traffic likely to be generated from a development is of relevance to the location withing a Conservation Area. The policy has been redrafted (WAD6) and this aspect has been retained.
505.	WL2	This policy requires careful consideration. The wording of the policy is inconsistent. Proposals to encourage the retention, improvement or re-use of an Asset of Community Value will be strongly supported..." but what is that proposal	Noted. The policies relating to community and wellbeing have been amalgamated into WAD18.

Ref.	Para / section	Summary of comments	Commentary from Steering Group
		<p>is for a different use than recognised in the ACV?</p> <p>The policy goes on to say loss of uses will be strongly resisted but what if the ACV route has been fully exhausted (say including full moratorium) and nothing comes forward. Policy seeks to add more protection than the ACV Regs.</p>	

Appendix C - List of statutory consultees consulted at Regulation 14 (Phase 1)

A list of consultees was provided to the Steering Group from James Preece (Planning Department) at WDC. Each was formally written to in June 21 at the commencement of the Regulation 14 (Phase 1) consultation.

Consultee	Contact name (where provided)	Subgroup	Email address
Coal Authority		Specific Bodies	planningconsultation@coal.gov.uk
Environment Agency		Duty to Co-operate	PlanningSSD@environment-agency.gov.uk
Historic England		Duty to Co-operate	e-seast@HistoricEngland.org.uk
Marine Management Organisation		Duty to Co-operate	info@marinemanagement.org.uk
Natural England		Duty to Co-operate	consultations@naturalengland.org.uk
Network Rail		Duty to Co-operate	townplanningse@networkrail.co.uk
National Highways		Duty to Co-operate	planningSE@highwaysengland.co.uk
High Weald AONB Unit		Specific Bodies	info@highweald.org
Forestry Commission		Duty to Co-operate	planningconsultationSEL@forestrycommission.gov.uk
Alciston Parish Meeting	Alex Stewart	Wealden Parishes	Alcistonparishmeeting@gmail.com
Alfriston Parish Council	Victoria Rutt	Wealden Parishes	clerk@alfristonparishcouncil.org.uk
Arlington Parish Council	Alison Stevens	Wealden Parishes	arlingtonparishcouncilsussex@aol.co.uk
Berwick Parish Council	Alison Stevens	Wealden Parishes	berwickparishcouncil@aol.co.uk
Buxted Parish Council	Beccy Macklen ?	Wealden Parishes	clerk@buxtedparish.org.uk
Chalvington with Ripe Parish Council	Fiona Hensher	Wealden Parishes	chalvingtonripe@aol.com
Chiddingly Parish Council	Claudine Feltham	Wealden Parishes	clerk@chiddingly.gov.uk
Crowborough Town Council	Caroline Miles	Wealden Parishes	clerk@crowboughtowncouncil.gov.uk
Cuckmere Valley Parish Council	Alison Stevens	Wealden Parishes	cuckmerepc@googlemail.com
Danehill Parish Council	Emma Fulham	Wealden Parishes	clerk@danehill-pc.org
East Dean & Friston Parish Council	Katrina Larkin	Wealden Parishes	clerk@edfparishcouncil.org.uk
East Hoathly with Halland Parish Council	Malcolm Ramsden	Wealden Parishes	easthoathlywithhallandpc@gmail.com
Fletching Parish Council	Lorn Thwaites	Wealden Parishes	clerk@fletching-pc.org
Forest Row Parish Council	David O'Driscoll	Wealden Parishes	parishclerk@forestrow.gov.uk

Consultee	Contact name (where provided)	Subgroup	Email address
Framfield Parish Council	Ann Newton	Wealden Parishes	clerk@framfieldcouncil.org.uk
Frant Parish Council	Rosie Karim	Wealden Parishes	clerk@frant-pc.gov.uk
Hadlow Down Parish Council	Samantha Weatherill	Wealden Parishes	clerk@hadlowdown.org
Hailsham Town Council	John Harrison	Wealden Parishes	██████████@hailsham-tc.gov.uk
Hartfield Parish Council	Emma Fulham	Wealden Parishes	parishclerk@hartfieldonline.com
Heathfield & Waldron Parish Council	Helen Johnson	Wealden Parishes	clerk@hwpc.org.uk
Hellingly Parish Council	Jennifer Hoodless	Wealden Parishes	clerk@hellingly-pc.org.uk
Herstmonceux Parish Council	Clare Harrison	Wealden Parishes	clerk@herstmonceuxparish.org.uk
Hooe Parish Council	Jackie Scarff	Wealden Parishes	hooepc2@btinternet.com
Horam Parish Council	Sally Blades	Wealden Parishes	clerk@horam.com
Isfield Parish Council	Alison Stevens	Wealden Parishes	clerk@isfieldpc.org.uk
Laughton Parish Council	Fiona Hensher	Wealden Parishes	laughtonclerk@gmail.com
Little Horsted Parish Meeting	Laura Sparshatt	Wealden Parishes	littlehorstedclerk@gmail.com
Long Man Parish Council	Claire Reynolds	Wealden Parishes	longmanclerk@gmail.com
Maresfield Parish Council	Claire Goossens	Wealden Parishes	clerk@maresfieldparish.org.uk
Mayfield & Five Ashes Parish Council	Janna Todd	Wealden Parishes	clerk@mayfieldfiveashes.org.uk
Ninfield Parish Council	Jackie Scarff	Wealden Parishes	ninfieldpc@btinternet.com
Pevensey Parish Council	Sarah Mosedale	Wealden Parishes	pevenseypc@outlook.com
Polegate Town Council	Jo Ognjanovic	Wealden Parishes	townclerk@polegatetowncouncil.gov.uk
Rotherfield Parish Council	Trevor Thorpe	Wealden Parishes	clerk@rotherfieldparishcouncil.co.uk
Selmeston Parish Meeting	David Quysner	Wealden Parishes	██████████@btinternet.com
Uckfield Town Council	Holly Goring	Wealden Parishes	townclerk@uckfieldtc.gov.uk
Wadhurst Parish Council	Amanda Barlow	Wealden Parishes	clerk@wadhurst-pc.gov.uk

Consultee	Contact name (where provided)	Subgroup	Email address
Warbleton Parish Council	Jackie Cottrell	Wealden Parishes	warbletonparishcouncil@gmail.com
Wartling Parish Council	Alison Stevens	Wealden Parishes	wartlingpc@aol.com
Westham Parish Council	Sue Sanders	Wealden Parishes	clerk@westhamparishcouncil.org.uk
Willingdon & Jevington Parish Council	Stephen Keogh	Wealden Parishes	parishclerkwjpc@btconnect.com
Withyham Parish Council	Debbie Siddle	Wealden Parishes	clerk@withyhamparishcouncil.org.uk
Tunbridge Wells Borough Council		Duty to Co-operate	planning.policy@tunbridgewells.gov.uk
Mid Sussex District Council		Duty to Co-operate	planningpolicy@midsussex.gov.uk
Rother District Council		Duty to Co-operate	planning.strategy@rother.gov.uk
Eastbourne Borough Council		Duty to Co-operate	planning.policy@lewes-eastbourne.gov.uk
Tandridge District Council		Duty to Co-operate	localplan@tandridge.gov.uk
Sevenoaks District Council		Duty to Co-operate	planning.policy@sevenoaks.gov.uk
Lewes District Council		Duty to Co-operate	ldf@lewes.gov.uk
Hastings Borough Council		Duty to Co-operate	fplanning@hastings.gov.uk
Brighton & Hove City Council		Duty to Co-operate	planningpolicy@brighton-hove.gov.uk
South Downs National Park Authority		Duty to Co-operate	████████@southdowns.gov.uk
East Sussex County Council Infrastructure Development		Duty to Co-operate	████████@eastsussex.gov.uk
West Sussex County Council		Duty to Co-operate	planning.policy@westsussex.gov.uk
Kent County Council		Duty to Co-operate	planning.policy@kent.gov.uk
High Weald, Lewes & Haven CCG		Duty to Co-operate	esxccg.contactus-eastsussexccg@nhs.net
Eastbourne, Hailsham & Seaford CCG		Duty to Co-operate	esxccg.contactus-eastsussexccg@nhs.net
Hastings & Rother CCG		Duty to Co-operate	esxccg.contactus-eastsussexccg@nhs.net
Surrey County Council		Duty to Co-operate	planning.consultations@surreycc.gov.uk
UK Power Networks		Specific Bodies	████████@edfenergy.com

Consultee	Contact name (where provided)	Subgroup	Email address
Southern Gas Network		Specific Bodies	customer@sgn.co.uk
National Grid		Specific Bodies	nationalgrid.uk@avisonyoung.com
Southern Water		Specific Bodies	Planning.Policy@southernwater.co.uk
South East Water		Specific Bodies	wre@southeastwater.co.uk
Homes England		Duty to Co-operate	enquiries@homesengland.gov.uk
Sussex PCC		Specific Bodies	pcc@sussex-pcc.gov.uk
Surrey PCC		Specific Bodies	SurreyPCC@surrey.pnn.police.uk
Sussex Police		Specific Bodies	DesigningOutCrime@sussex.pnn.police.uk
Ashburnham & Penhurst Parish Council		Neighbouring Parishes	clerk@ashburnham-penhurst.net
Barcombe Parish Council		Neighbouring Parishes	clerk@barcombepc.net
Burwash Parish Council		Neighbouring Parishes	parishclerk@burwashpc.org.uk
Catsfield Parish Council		Neighbouring Parishes	clerk@catsfieldpc.co.uk
Chalieu Parish Council		Neighbouring Parishes	chaileypc@btconnect.com
Chiddingstone Parish Council		Neighbouring Parishes	clerk@chiddingstone.org
Cowden Parish Council		Neighbouring Parishes	cowdenpc@gmail.com
Dallington Parish Council		Neighbouring Parishes	clerk@dallington.org.uk
Dormansland Parish Council		Neighbouring Parishes	dormansclerk@outlook.com
East Grinstead Town Council		Neighbouring Parishes	townclerk@eastgrinstead.gov.uk
Firle Parish Council		Neighbouring Parishes	firleclerk@gmail.com
Glynde & Beddingham Parish Council		Neighbouring Parishes	clerk@glyndebeddingham-pc.gov.uk
Horstead Heynes Parish Council		Neighbouring Parishes	hkparishcouncil@gmail.com
Lamberhurst Parish Council		Neighbouring Parishes	parishclerk@lamberhurstvillage.co.uk
Lindfield Parish Council		Neighbouring Parishes	clerks@lindfieldparishcouncil.gov.uk

Consultee	Contact name (where provided)	Subgroup	Email address
Newick Parish Council		Neighbouring Parishes	newickpc@newick.net
Penshurst Parish Council		Neighbouring Parishes	penshurst.pc@gmail.com
Ringmer Parish Council		Neighbouring Parishes	clerk@ringmerparishcouncil.gov.uk
Seaford Town Council		Neighbouring Parishes	admin@seafordtowncouncil.gov.uk
South Highton Parish Council		Neighbouring Parishes	parishcouncil@southheighton-pc.org.uk
Speldhurst Parish Council		Neighbouring Parishes	clerk@speldhurstparishcouncil.gov.uk
Ticehurst Parish Council		Neighbouring Parishes	[REDACTED] @btconnect.com
West Hoathly Parish Council		Neighbouring Parishes	clerk@westhoathly.gov.uk
Virgin Media		Specific Bodies	-
Cable & Wireless		Specific Bodies	companysecretary@cw.com
British Telecom		Specific Bodies	
EE		Specific Bodies	public.affairs@ee.co.uk
O2		Specific Bodies	-
Vodafone		Specific Bodies	GroupMedia@vodafone.com
Arqiva Communications Limited		Specific Bodies	planning@arqiva.com

APPENDIX D Copy of Feedback Survey for Regulation 14 (Phase 2)

Wadhurst Parish Council: Pre-Submission Neighbourhood Plan Feedback Survey

About this Survey

Residents of Wadhurst Parish, together with other interested parties, are invited to comment on the Phase 2 Pre-Submission Version Wadhurst Neighbourhood Plan.

Please read the full text of the Neighbourhood Plan and the policies and indicate how strongly, or otherwise, you agree with each policy.

You can open a copy of the Plan in a new window by visiting the [Wadhurst Parish Council website](#).

Please tick the appropriate box to record your views and add any additional comments you wish to make.

We estimate that it should take approximately 5 to 10 minutes to complete. Please try to complete the whole survey, as your views are extremely important to us.

Our 18 Neighbourhood Plan policies:

1. To what extent do you agree with the following policies?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
Policy WAD1: Location of development	☐	☐	☐	☐	☐
Policy WAD2: Meeting local housing needs	☐	☐	☐	☐	☐
Policy WAD3: Design and character of development	☐	☐	☐	☐	☐
Policy WAD4: Sustainability and design	☐	☐	☐	☐	☐
Policy WAD5: Conserving heritage assets	☐	☐	☐	☐	☐
Policy WAD6: Conservation Areas	☐	☐	☐	☐	☐
Policy WAD7: Safe and sustainable movement	☐	☐	☐	☐	☐
Policy WAD8: Mitigating traffic congestion	☐	☐	☐	☐	☐
Policy WAD9: Car parking provision	☐	☐	☐	☐	☐
Policy WAD10:					

Employment
retention and local
economy viability

☐☐☐☐☐

Policy WAD11:
Supporting
sustainable rural
tourism

☐☐☐☐☐

Policy WAD12:
Communication
infrastructure
support

☐☐☐☐☐

Policy WAD13:
Conservation of the
natural
environment,
ecosystems and
biodiversity

☐☐☐☐☐

Policy WAD14: Bewl
Water Reservoir
Area and associated
public activities

☐☐☐☐☐

Policy WAD15:
Protection of
distinctive and
highly valued views

☐☐☐☐☐

Policy WAD16:
Local Green Spaces

☐☐☐☐☐

Policy WAD17:
Protection of dark
skies

☐☐☐☐☐

Policy WAD18:
Important
community facilities

☐☐☐☐☐

Please add any comments you have on any of the policies. Please indicate which policy you are commenting on by quoting the Policy number.

2. Please provide any comments you have on the Design Code for Wadhurst, which has been prepared to underpin the Neighbourhood Plan. You can view the document on the [Wadhurst Parish Council website](#).

3. Please provide any comments you have on the Community Aspirations contained in Section 13 of the Wadhurst Neighbourhood Plan?

4. Are there any other comments you wish to make on the Wadhurst Neighbourhood Plan?

5. For analysis and response purposes, if you are willing, please provide your name, street, postcode and email address.

Name	<input type="text"/>
Street name	<input type="text"/>
Postcode	<input type="text"/>
Email Address	<input type="text"/>

A summary of all comments made will be publicly available. Please note that personal information provided will be confidential and processed in line with the Data Protection Act 1998 and the General Data Protection Regulations.

The Parish Council will process your details in relation to the preparation of the Wadhurst Neighbourhood Plan only.

As part of the Consultation and in line with the new General Data Protection Regulations (GDPR), please confirm that you are content for the Parish Council to pass on your contact details (name, address/email address) to Wealden District Council so that they can contact you at next formal (Regulation 16) consultation stage.

6. I confirm that I am happy for the Parish Council to pass my contact details to Wealden District Council

- ☐ Yes
☐ No

Thank you for completing the survey. Please click 'Done' to submit your answers.

APPENDIX E List of statutory consultees consulted at Regulation 14 (Phase 2)

The following statutory consultees were consulted at the commencement of Regulation 14 (Phase 2):

Consultee	Contact name (where provided)	Subgroup	Email address	Response received?
Environment Agency		Duty to Co-operate	PlanningSSD@environment-agency.gov.uk	No
Historic England		Duty to Co-operate	e-seast@HistoricEngland.org.uk	No
Marine Management Organisation		Duty to Co-operate	info@marinemanagement.org.uk	No
Natural England		Duty to Co-operate	consultations@naturalengland.org.uk	No
Network Rail		Duty to Co-operate	townplanningse@networkrail.co.uk	No
National Highways		Duty to Co-operate	planningSE@highwaysengland.co.uk	Yes
Tunbridge Wells Borough Council		Duty to Co-operate	planning.policy@tunbridgewells.gov.uk	Yes
Mid Sussex District Council		Duty to Co-operate	planningpolicy@midsussex.gov.uk	No
Rother District Council		Duty to Co-operate	planning.strategy@rother.gov.uk	No
Eastbourne Borough Council		Duty to Co-operate	planning.policy@lewes-eastbourne.gov.uk	No
Tandridge District Council		Duty to Co-operate	localplan@tandridge.gov.uk	No
Sevenoaks District Council		Duty to Co-operate	planning.policy@sevenoaks.gov.uk	No
Lewes District Council		Duty to Co-operate	ldf@lewes.gov.uk	No
Hastings Borough Council		Duty to Co-operate	fplanning@hastings.gov.uk	No
Brighton & Hove City Council		Duty to Co-operate	planningpolicy@brighton-hove.gov.uk	No
South Downs National Park Authority		Duty to Co-operate	██████████@southdowns.gov.uk	No
East Sussex County Council		Duty to Co-operate	██████████@eastsussex.gov.uk	Yes
West Sussex County Council		Duty to Co-operate	planning.policy@westsussex.gov.uk	Yes
Kent County Council		Duty to Co-operate	planning.policy@kent.gov.uk	No
High Weald, Lewes & Haven CCG		Duty to Co-operate	esxccg.contactus-eastsussexccg@nhs.net	No
Eastbourne, Hailsham & Seaford CCG		Duty to Co-operate	esxccg.contactus-eastsussexccg@nhs.net	No
Hastings & Rother CCG		Duty to Co-operate	esxccg.contactus-eastsussexccg@nhs.net	No

Surrey County Council		Duty to Co-operate	planning.consultations@surreycc.gov.uk	No
Homes England		Duty to Co-operate	enquiries@homesengland.gov.uk	No
Ashburnham & Penhurst Parish Council		Neighbouring Parishes	clerk@ashburnham-penhurst.net	No
Barcombe Parish Council		Neighbouring Parishes	clerk@barcombepc.net	No
Bexhill-On-Sea Town Council		Neighbouring Parishes	town.clerk@bexhilltowncouncil.gov.uk	No
Burwash Parish Council		Neighbouring Parishes	parishclerk@burwashpc.org.uk	No
Catsfield Parish Council		Neighbouring Parishes	clerk@catsfieldpc.co.uk	No
Chailey Parish Council		Neighbouring Parishes	chaileypc@btconnect.com	No
Chiddingstone Parish Council		Neighbouring Parishes	 clerk@chiddingstone.org	No
Cowden Parish Council		Neighbouring Parishes	cowdenpc@gmail.com	No
Dallington Parish Council		Neighbouring Parishes	clerk@dallington.org.uk	No
Dormansland Parish Council		Neighbouring Parishes	dormansclerk@outlook.com	No
East Grinstead Town Council		Neighbouring Parishes	townclerk@eastgrinstead.gov.uk	No
Firle Parish Council		Neighbouring Parishes	firleclerk@gmail.com	No
Glynde & Beddingham Parish Council		Neighbouring Parishes	clerk@glyndebeddingham-pc.gov.uk	No
Horsted Keynes Parish Council		Neighbouring Parishes	hkparishcouncil@gmail.com	No
Lamberhurst Parish Council		Neighbouring Parishes	clerk@lamberhurstvillage.org	No

Lindfield Parish Council		Neighbouring Parishes	clerks@lindfieldparishcouncil.gov.uk	No
Newick Parish Council		Neighbouring Parishes	newickpc@newick.net	No
Penshurst Parish Council		Neighbouring Parishes	penshurst.pc@outlook.com	No
Ringmer Parish Council		Neighbouring Parishes	clerk@ringmerparishcouncil.gov.uk	No
Seaford Town Council		Neighbouring Parishes	admin@seafordtowncouncil.gov.uk	No
South Highton Parish Council		Neighbouring Parishes	parishcouncil@southheighton-pc.org.uk	No
Speldhurst Parish Council		Neighbouring Parishes	clerk@speldhurstparishcouncil.gov.uk	No
Ticehurst Parish Council		Neighbouring Parishes	clerk@ticehurstparishcouncil.co.uk	No
West Hoathly Parish Council		Neighbouring Parishes	clerk@westhoathly.gov.uk	No
Coal Authority		Specific Bodies	planningconsultation@coal.gov.uk	No
UK Power Networks		Specific Bodies	██████████@edfenergy.com	No
Southern Gas Network		Specific Bodies	customer@sgn.co.uk	No
National Grid		Specific Bodies	nationalgrid.uk@avisonyoung.com	Yes
Southern Water		Specific Bodies	Planning.Policy@southernwater.co.uk	Yes
South East Water		Specific Bodies	wre@southeastwater.co.uk	No
Virgin Media		Specific Bodies	-	No
Cable & Wireless		Specific Bodies	companysecretary@cw.com	No
British Telecom		Specific Bodies	-	No
EE		Specific Bodies	public.affairs@ee.co.uk	No
O2		Specific Bodies	-	No
Vodafone		Specific Bodies	GroupMedia@vodafone.com	No

Arqiva Communications Limited		Specific Bodies	planning@argiva.com	No
Alciston Parish Meeting	Alex Stewart	Wealden Parishes	Alcistonparishmeeting@gmail.com	No
Alfriston Parish Council	Victoria Rutt	Wealden Parishes	clerk@alfristonparishcouncil.org.uk	No
Arlington Parish Council	Alison Stevens	Wealden Parishes	arlingtonparishcouncilsussex@aol.co.uk	No
Berwick Parish Council	Alison Stevens	Wealden Parishes	berwickparishcouncil@aol.co.uk	No
Buxted Parish Council	Claudine Feltham	Wealden Parishes	clerk@buxtedparish.org.uk	No
Chalvington with Ripe Parish Council	Paul Richards	Wealden Parishes	chalvingtonwithripeclerk@gmail.com	No
Chiddingly Parish Council	Julie O'Donnell	Wealden Parishes	clerk@chiddingly.gov.uk	No
Crowborough Town Council	Caroline Miles	Wealden Parishes	info@crowboroughtowncouncil.gov.uk	No
Cuckmere Valley Parish Council	Alison Stevens	Wealden Parishes	cuckmerepc@googlemail.com	No
Danehill Parish Council	Emma Fulham	Wealden Parishes	clerk@danehill-pc.org	No
East Dean & Friston Parish Council	Katrina Larkin	Wealden Parishes	clerk@edfparishcouncil.org.uk	No
East Hoathly with Halland Parish Council	Malcolm Ramsden	Wealden Parishes	easthoathlywithhallandpc@gmail.com	No
Fletching Parish Council	Gabriella Paterson-Griggs	Wealden Parishes	clerk@fletching-pc.org	No
Forest Row Parish Council	David O'Driscoll	Wealden Parishes	parishclerk@forestrow.gov.uk	No
Framfield Parish Council	Ann Newton	Wealden Parishes	clerk@framfieldcouncil.org.uk	No
Frant Parish Council	Rosie Barnes	Wealden Parishes	clerk@frant-pc.gov.uk	No
Hadlow Down Parish Council	Samantha Weatherill	Wealden Parishes	clerk@hadlowdown.org	No
Hailsham Town Council	John Harrison	Wealden Parishes	 @hailsham-tc.gov.uk	No
Hartfield Parish Council	Emma Fulham	Wealden Parishes	parishclerk@hartfieldonline.com	No
Heathfield & Waldron Parish Council	Helen Johnson	Wealden Parishes	clerk@hwpc.org.uk	No
Hellingly Parish Council	Jennifer Hoodless	Wealden Parishes	clerk@hellingly-pc.org.uk	No
Herstmonceux Parish Council	Clare Harrison	Wealden Parishes	clerk@herstmonceuxparish.org.uk	No
Hooe Parish Council	Jane Warrener	Wealden Parishes	clerk@hooe-pc.gov.uk	No

Horam Parish Council	Sally Blades	Wealden Parishes	clerk@horam.com	No
Isfield Parish Council	Alison Stevens	Wealden Parishes	isfieldpc1@aol.com	No
Laughton Parish Council	Fiona Hensher	Wealden Parishes	laughtonclerk@gmail.com	No
Little Horsted Parish Meeting	Laura Sparshatt	Wealden Parishes	littlehorstedclerk@gmail.com	No
Long Man Parish Council	Claire Reynolds	Wealden Parishes	longmanclerk@gmail.com	No
Maresfield Parish Council	Claire Goossens	Wealden Parishes	clerk@maresfieldparish.org.uk	No
Mayfield & Five Ashes Parish Council	Janna Todd	Wealden Parishes	clerk@mayfieldfiveashes.org.uk	No
Ninfield Parish Council	Jackie Scarff	Wealden Parishes	clerk@ninfieldpc.co.uk	No
Pevensey Parish Council	Sarah Mosedale	Wealden Parishes	clerk@pevenseyparishcouncil.gov.uk	No
Polegate Town Council	Jo Ognjanovic	Wealden Parishes	townclerk@polegatetowncouncil.gov.uk	No
Rotherfield Parish Council	Adam Hardy	Wealden Parishes	clerk@rotherfieldparishcouncil.co.uk	No
Selmeston Parish Meeting	David Quysner	Wealden Parishes	selmestonparishmeeting@gmail.com	No
Uckfield Town Council	Holly Goring	Wealden Parishes	townclerk@uckfieldtc.gov.uk	No
Wadhurst Parish Council	Claudine Feltham	Wealden Parishes	clerk@wadhurst-pc.gov.uk	No
Warbleton Parish Council	Jackie Cottrell	Wealden Parishes	warbletonparishcouncil@gmail.com	No
Wartling Parish Council	Alison Stevens	Wealden Parishes	wartlingpc@aol.com	No
Westham Parish Council	Sue Sanders	Wealden Parishes	clerk@westhamparishcouncil.org.uk	No
Willingdon & Jevington Parish Council	Stephen Keogh	Wealden Parishes	parishclerkwjpc@btconnect.com	No
Withyham Parish Council	Debbie Siddle	Wealden Parishes	clerk@withyhamparishcouncil.org.uk	No
High Weald AONB Unit			info@highweald.org	No
Elite Leisure / Bewl Water			info@beowlwater.co.uk	Yes
Forestry Commission			planningconsultationSEL@forestrycommision.co.uk	No
Homes England			enquiries@homesengland.gov.uk	No
Southern Water			Planning.policy@southernwater.co.uk	Yes
SouthEast Water			wre@southeastwarer.co.uk	No

Gas			customer@sgn.co.uk	No
National Grid			Nationalgrid.uk@avisonyoung.com	Yes
Sussex Police			pcc@sussex-pcc.gov.uk	No
National Highways			PlanningSE@highwaysengland.co.uk	No

APPENDIX F Summary of Regulation 14 (Phase 2) feedback from the community, landowners and statutory consultees (excluding WDC)

Wadhurst Neighbourhood Plan – Comments received at Pre-Submission (Regulation 14) Phase II Consultation and proposed responses from the Steering Group

Representations (Rep.) received from:

1. DMH Stallard on behalf of Greymoor Homes
2. Southern Water
3. Magnum Opus Group
4. West Sussex County Council
5. East Sussex County Council (comments received from Highways, Education, Culture and Tourism, Public Health)
6. Community feedback (individual contact details not shown) – 34 responses received.
7. Kember Loudon Williams (KLW) on behalf of Mr Durnford who owns land to the east of Wadhurst and has submitted an application for 15 dwellings on land to the south of Cousley Wood Road (LPA Ref: WD/2022/1610/MAO)
8. National Grid
9. Tunbridge Wells Borough Council
10. Kember Loudon Williams (KLW) on behalf of the Elite Leisure, Salomons UK Ltd, who have a controlling interest over the Bewl Water Estate.

Support for individual policies (from SurveyMonkey responses):

Policy number	Strongly Agree/ Agree	Policy number	Strongly Agree/ Agree	Policy number	Strongly Agree/ Agree
WAD1	89%	WAD8	94%	WAD15	94%
WAD2	86%	WAD9	97%	WAD16	89%
WAD3	88%	WAD10	94%	WAD17	97%
WAD4	88%	WAD11	80%	WAD18	91%
WAD5	97%	WAD12	97%		
WAD6	91%	WAD13	94%		
WAD7	91%	WAD14	94%		

Comments are listed by paragraph number / policy, the Ref refers to the respondent number, with a summary of the comments and proposed SG response.

Full responses can be found in the Evidence Pack.

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
506.	General	4	No comments.	Noted.	✓
507.	General	5	Highways: Suggest reference to Uplands School which has a wide catchment area, including the Parish and accessibility to the college.	Unclear if this is in relation to a particular policy in the plan (the comment was made below the comment on the tourism policy, but as a separate point.	✓
508.	General	5	Education: Other than referencing the school playing fields at Wadhurst CE Primary School and Uplands Academy as designated local green spaces, there appears to be little mention of education in the plan. Our pupil forecasts take account of the latest housing completions and trajectory information for the area provided by Wealden District Council earlier this year. On this basis, we have no particular comments to make at this stage.	Education provision largely sits outside the sphere of influence for the Neighbourhood Plan, hence is not focused on within the WNP.	✓
509.	General	5	Public Health: It is acknowledged that many of the policies within the Plan will have possible benefits on health and wellbeing however this has not been fully acknowledged or developed in the Plan. The Plan needs to recognise the need to protect and improve the health and wellbeing of its population in order to reduce health inequalities and create opportunities for creating health equity and prosperity as well as healthy and sustainable places. A useful reference document is the Town and Country Planning Association's 'Reuniting Health with	Last sentence in Vision to be amended to read "Sustainable ways of improving the built and natural environment, travel, leisure and other activities and facilities, which promote health and well-being, will be sought wherever possible.", & Objective 5 to be amended to read "Health, Wellbeing and Leisure: To retain and, where possible, expand the range of facilities and amenities available for local residents" WAD8, B could say "Such reports must include consideration of the impact on the health and safety of cyclists, horse riders and pedestrians, ..."	✓ ✓ ✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			Planning in promoting health communities' that can be found in this link: https://tcpa.org.uk/wp-content/uploads/2021/11/TCPA_5-Years-of-Health.pdf	<ul style="list-style-type: none"> • The phrase 'health and wellbeing' could be incorporated in the 1st sentence of Para. 9.1, as part of the 'multiple benefits' referred to here, • The phrase 'health and wellbeing' could be incorporated in Para. 9.14 and, perhaps also, woven into the subsequent paragraphs, • The phrase 'health and wellbeing' could be incorporated in Para. 9.44 • The phrase 'health and wellbeing' could be incorporated in the 1st sentence of Para. 10.2. 	✓ ✓ ✓ ✓
510.	General	6	Protect the High Weald AONB as a priority and no further development until High Street road traffic congestion is resolved and full time GP services (not just Locums) improved.	Noted.	✓
511.	General	6	I strongly agree with the suggestions of this plan. Whilst we must modernise with the times and ensure that there is sufficient housing and services for all, it is important that we preserve our area and pass it on. A sensible approach is needed, but the approach must be tailored to best support the residents of the parish. We have to remember that once a landscape is taken, it will never come back. We need to sustain what we have so that our ancestors can have it too	Noted.	✓
512.	Para 2.15	5	High car dependency is recognised, but welcome the desire for more opportunities for safer walking and cycling routes. Suggest pedestrians and cyclists are referred to as 'people choosing to walk or cycle'.	Noted and amend.	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
513.	Section 2	5	<p>About Wadhurst:</p> <p>It is suggested that health intelligence data on population demographics is used to expand on health inequalities in order to see trends and key issues in the parish. For example a breakdown of population by all ages in a table, and using the 2011 Census (or 2021 when available) and to set out the proportions of the population in good or bad health, that can be compared with the District and nationally to build up the profile of the health of parish residents. Please refer to area profile on the East Sussex in Figures website (link provided).</p> <p>Challenges and Opportunities facing the Parish; The section needs to integrate health and wellbeing issues more holistically and comprehensively particularly around 'opportunities' including active travel, social cohesion through better connectivity (connected neighbourhoods) and improved facilities and access to nature.</p>	<p>The SG does not support ESCC's 1st suggestion here, regarding health data, because the data shows that Wadhurst's population is healthier than all the comparatives. Demonstrating that 'superiority' would undermine the 'health & wellbeing' argument supporting some of our policies.</p> <p>The SG would support referring to, 'health & wellbeing' into para. 2.17 under Challenges & Opportunities or adding 2.18 "Protecting and improving the health and wellbeing of parishioners underlies most of these challenges and opportunities".</p>	<p>✓</p> <p>✓</p>
514.	Section 3 (Vision and Objectives0	5	<p>Objective 2: Support. Suggest include 'cycleways' alongside footpaths and bridleways.</p> <p>Highways issues affect the community and therefore are important and should be referenced within the NP.</p>	<p>Add in.</p> <p>Highways issues are referenced heavily in the document, including a detailed evidence document detailing key issues of</p>	<p>✓</p> <p>✓</p>

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
				concern to the community. But currently narrow road widths and lack of pavements restrict the development of cycleways – there are no designated cycleways in Wadhurst Parish and land owners are against cycle use on private lands.	
515.	Vision and Objectives	5	Public Health – suggested amendments to include greater reference to health and well-being.	The Vision statement has been amended to make explicit reference to health and wellbeing.	✓
516.	Objectives	9	<u>Objective 1</u> – TWBC support the aspiration of this objective, however feel that instead of the current wording it could be amended as follows – ‘To provide sympathetically designed high quality housing for parishioners <u>all</u> ’.	Amend.	✓
517.	WAD1: Location of Development	5	Development should also be located where walking and cycling infrastructure can be provided to connect to key facilities to reduce reliance on the private car.	Noted. This is picked up explicitly in Policy WAD7, hence no amendments required.	✓
518.	WAD1: Location of Development	6	The number of houses that are expected to be built in this historic village is quite frankly absurd - apart from the fact that the local 'people' infrastructure i.e. schools, doctors, dentists, etc. is already at capacity, but the 'Utility Services' i.e. water, sewerage, power, communications, etc. are already at, or beyond, breaking point (this is especially so with sewerage in certain parts of the village, where many properties are not even connected to main sewage). There is also the issue of parking - this not only leads to high levels of congestion and pollution (especially at school times), but also affects local businesses. The houses that	Noted. The WNP does not seek to allocate housing. The policies of the WNP must be in conformity with the strategic policies of the adopted local plan and the NPPF. A new Local Plan is being prepared and this will set out the strategic housing requirement for the whole district and will assess sites to determine a sustainable delivery strategy. The WNP seeks to influence the type of housing being built (e.g. size, affordability, mix, tenure etc.) and the design of development, as well as setting out where development would be most appropriately sited. The emerging local plan will need to ensure that any new housing is facilitated by infrastructure and the WNP policies support this by seeking to influence provision as far as possible, while mitigating against negative	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			are currently either planned, or being built, are not generally affordable houses, but are mainly 4- or 5-bedroom 'executive' homes - this does not help 'local' residents who have grown up in the village, 1st time buyers, etc - it just serves to drive these people away to areas that are more affordable.	impacts such as on the highways, the environment and local amenity.	
519.	WAD1: Location of Development	6	The number of houses the government expect to be built in Wadhurst in this historic village is ridiculous, particularly with our infer-structure problems, such as: too few doctors, sewage already in a bad way, traffic congestion already causing severe problems at times. Schools places at a premium. The houses being built are not affordable housing to help local people buy the own homes (developers don't make a big enough profit on these!!)	See Rep. 13.	✓
520.	WAD1: Location of Development	6	There is a field between CG3 and CG9 .. why is this not included? the same reasons apply to that Unlike CG9 there has not been any proposal for development? yet?	This comment is in relation to the proposed 'Green Gaps' (CCG should read GG), which seek to restrict coalescence between individual and distinct settlements. GG3 and GG9 both serve a purpose in restricting coalescence between Turners Green/Sparrows Green and Pell Green and Wood's Green respectively. The field between GG3 and GG9 is heavily wooded (probably ancient woodland) and therefore somewhat protected.	✓
521.	WAD1: Location of Development	7	Objects to GG5 Primmers Field, Cousley Wood Road, Primmers Green. Considers there to be an overlap between the Green Gap designations and potential housing sites and suggest that the designation was	The NP has been 6 years in gestation; maintaining separation of distinct settlements has been an aim since the early days, in particular, the idea of maintaining the separation of Primmers Green, as well as Sparrows Green/Turners Green, from	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			<p>clearly being used to constrain available sites from coming forward for development. It is disappointing therefore that all 9 Green Gaps have remained in the Neighbourhood Plan despite our earlier comments and the clear objection from the District Council.</p> <p>Appendix A of the Draft Neighbourhood Plan attempts to justify the use of Green Gaps and provides the methodology for assessing them, yet it fails to provide a balanced consideration of harm and benefits. Much of the reasoning seems to be simply seeking to protect land for its own sake. As stated previously, such an approach runs the risk of preventing sustainable development from coming forward and fails to meet the basic conditions. With regards to Primmers Field (GG5) the justification given for the Green Gap designation is set out on Appendix A page 21 as follows: <i>"Designation will protect against coalescence development between Primmers Green and Wadhurst. This is the last green gap between Primmers Green Lane and Wadhurst with view of the steeple of St Peter and St Paul Church (Grade 2 listed). The major green field on entry to Wadhurst village from Lamberhurst"</i>. With regards to the point about protection against coalescence between Wadhurst and Primmers Green, there is already development along the northern edge of Cousley Wood Road linking Wadhurst and Primmers Green. The link has already been</p>	<p>Wadhurst Village pre-dated the Primmers planning applications.</p> <p>The aspiration to include green gaps has been in the public domain via the Parish Council throughout – in fact it is the case that many of the sites in the SHELAA have come forward in the years since the publication of the aspiration to include green gaps for the purpose of reducing coalescence and retaining the distinctive character of the individual settlements and settlement edges.</p> <p>The SG have revisiting the green gap evidence and consider that each is robustly evidenced.</p>	

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			<p>made. The northern part of the field is surrounded on all three sides of developments. Due to the quantum of surrounding residential built form, the land has the appearance of a settlement edge character. The comment about this being “the last green gap” and “a major green field on entry”, is unnecessary because this is going to be the case with any settlement edge character site located on a peripheral road coming in and out of the town. Accordingly, this reasoning should not be justification of a Green Gap designation. Finally, with regards to the views, glimpses of the spire can be seen from the field but are intermittently obscured by intervening planted boundaries. Furthermore, it’s important to remember that the church has a tall spire which is visible from a wide area, not just from Primmers Field. In other words, these distant views of the spire are not exclusive to the site and should not, therefore, be given as a qualifying reason for designating the land as a Green Gap. We have said all along that existing levels of protection are already in place for sites in the countryside and for sites in the AONB in the form of statutory duties and national planning policy. These existing levels of protection are considered sufficient to protect the area without the need to prescribe further restrictions and Green Gap designations. The neighbourhood plan can only propose a Green Gap, if it meets the Basic Conditions, and is in</p>		

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			general compliance with the emerging Local Plan. The Primmers Field Green Gap fails to contribute to the achievement of sustainable development, and we ask that it is removed from the Plan.		
522.	WAD2: Meeting local housing need	5	We acknowledge the reference to HAPPI principles, and due to the older and aging population reference should also be included to the guidance by RTPI - Dementia & Town Planning, RTPI 2020 . Also to reflect older people's needs especially in relation to dementia reference in the supporting text could be made to the East Sussex Dementia Joint Strategic Needs Assessment Dementia JSNA (eastsussexjsna.org.uk) .	Noted and add reference to this into the policy / support text accordingly.	✓
523.	Section 6	9	<u>Section 6 – Character, Heritage and Design</u> - The policies are considered to provide a good level of detail and guidance in identifying and making provision for the special qualities and distinctive character of Wadhurst Parish. The landscape first approach at paragraph 6.5 is particularly welcomed.	Noted.	✓
524.	WAD3: Design and Character of Development		<u>Site context:</u> amendment suggested as follows: <ul style="list-style-type: none"> vii. ensuring development of affecting and/or in proximity to designated and local heritage assets and their settings conserves, preserves, reflects and enhances the historic asset and the historic environment in accordance with their significance; 	Following comments from WDC, this clause has been removed as it is already covered in Policy WAD5 and there is no need to duplicate wording within policies as the policies are read collectively.	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			<p><u>Landscaping, biodiversity and open space:</u></p> <ul style="list-style-type: none"> xx. provide natural and amenity public green space within all major development sites in line with guidance and standards contained in the Wealden Open Space Study (2022) – Area Profile Wadhurst Parish Council (part 2 of 2), or any subsequent standard set by Wealden District Council, which supersedes this assessment – <u>would suggest that the provision of recreation open space may be better placed as a policy in its own right under the Environment section as it is considered to get somewhat lost amongst lots of other policy detail where currently placed in the Design section.</u> 	<p>Noted – the SG would like to retain this as part of the design policy.</p>	✓
525.	WAD3, WAD4 and WAD6	6	<p>I believe that insisting that all development should be of the same “Wadhurst” character stifles innovation of design and results in a uniformity of appearance that is not desirable. It also adds significant cost when combined with policy WAD 4, which is more important. It may be important to retain the “Wadhurst” character in the conservation areas (hence I support WAD6), but outside that, we should be able to let design innovation thrive.</p>	<p>Policy WAD3 states that “Innovation in design will be supported where it is associated with sustainability, demonstrably conserves and enhances the High Weald AONB, being in keeping and utilising materials and detailing typical of Wadhurst.”</p> <p>The comment fails to recognise that WAD3 and Section 6, in mainly referring to ‘settlements’ in the Parish, does not insist “that all development should be of the same “Wadhurst” character “. This is because the various settlements differ in their character, so the policy only requires development to be consistent with the settlement within which it is located.</p> <p>For clarity, amend the two references to “Wadhurst” in WAD3, to “the Parish”.</p>	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
526.	WAD4: Sustainability and Design	5	It is suggested the Policy and supporting text should refer to the health and wellbeing benefits of good neighbourhood design both physical and mental.	Noted – amend text to make greater reference to this.	✓
527.	WAD4:	6	<p>I feel this could be improved. I couldn't see any reference to this, which I feel is important: Providing sufficient external amenity space, refuse and recycling storage and car and bicycle parking to ensure a high quality and well managed streetscape Or this: Providing access for people with restricted mobility Or this: If additional power lines are required, they should all be run underground I couldn't see any reference to the importance of new buildings having in-built bat and bird boxes, such as swift bricks. These requirements should be as standard policy. Perhaps it would fit into Policy WAD4? It is vitally important that buildings themselves have the capability of being beneficial to the environment. Please see:</p> <p>https://www.swift-conservation.org/Leaflet%20%20-%20Swift%20Nest%20Bricks%20-%20installation%20&%20suppliers-small.pdf https://www.bats.org.uk/our-work/buildings-planning-and-development/industry-advice/new-build</p>	<p>These issues are covered in other policies in the Plan and there is no need to repeat them across policies.</p> <p>C</p> <p>WAD3 could explicitly mention wildlife friendly features such as bird boxes, hedgehog holes etc.</p>	<p>✓</p> <p>✓</p>

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			I couldn't see any reference to flood measures, ie the requirement for porous asphalt to be used on all new drives/roads etc. Or permeable paving slabs. This should be referenced. Finally solar panels integrated into a roof should be as standard. Great to see solar was mentioned but would like solar to be required (appreciating there would be some situations where it wouldn't be suitable, ie a house being built in the shade.	The policies cannot stipulate above and beyond what is required as a minimum by Building Regulations.	✓
528.	Para 7.5	5	Suggest Figure 7.2 could indicate the location of the rail station and any walking/cycling routes which provide access.	This map is intending to illustrate retail facilities in Wadhurst village itself.	✓
529.	Para 7.9	5	LCWIP is referred to as emerging. This needs to be updated as it was approved by the County Council's Cabinet in September 2021. It is a live document so any schemes coming forward for Wadhurst can be considered/included in future iterations of the plan. It would be helpful to include any suggested specific walking and cycling schemes within the NP. We welcome the enthusiasm for liaising with ESCC to discuss opportunities for road based and sustainable transport improvements.	Noted and amend. Include additional action to identify where improvements to the movement network could be made, to inform discussions with ESCC. See also comment in Ref. 9,	✓
530.	WAD7: Safe and Sustainable Movement	5	Reference the East Sussex Local Transport Plan (including the emerging East Sussex LTP4 which has recently been available for consultation) and the East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP). These are key strategic documents. Whilst there are no proposals specifically for Wadhurst in the LCWIP this is a live document and should any	Noted and add into the supporting text.	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			<p>walking / cycling schemes be identified these could be included in future iterations of the plan.</p> <p>Include reference to the health and wellbeing benefits of active travel.</p> <p>Clause B: use the term ‘segregated’ instead of separated.</p> <p>The policy and supporting text should emphasise the physical health and mental wellbeing benefits of increasing active travel opportunities in the area.</p>	<p>Noted and add into the supporting text.</p> <p>Amend.</p> <p>Noted – this has been added into the supporting text and is an overarching objective of the WNP.</p>	<p>✓</p> <p>✓</p> <p>✓</p>
531.	WAD7: Safe and Sustainable Movement	6	<p>WAD7 makes repeated use of Dobbin Inn as a point on Cousley Wood Road B2099.. this building was renamed in recent years and ceased to be an Inn some years ago and is now a building site .. and was the Balaclava Inn for many many more years before that Better terminology would be helpful!</p>	<p>RF: - Whilst WAD7 does not refer to ‘Dobbin Inn’, table 7.3 does refer to it. The name of the former Balaclava Inn was indeed changed to Dobbin Inn and, following closure as a pub, the building is currently undergoing conversion to flats. This flats development is referred to in Appendix B, in the table in para. B4 and in para. B6, where it is referred to as the Balaclava Pub. These latter references have been amended to Balaclava/Dobbin Inn for consistency.</p>	✓
532.	WAD8: Mitigating traffic congestion	5	<p>Clause A seeks a Transport Assessment for development proposals greater than 10 dwellings and a Transport Statement for less than 10 dwellings. It also seeks to assess Wadhurst High St, Sparrows Green Road and B2099/B2100 junctions.</p> <p>Comment: The Transport related assessment documents required by applicants cannot be specified to the scales of development as</p>	<p>Amend the policy text to “where required, TAs/ TS’s must address to the satisfaction of the highways authority the direct and cumulative transport impact on the following roads, as identified on Figure 7.4: a. Wadhurst High Street (B2099) b. Sparrows Green Road c. B2099/B2100 road junctions.”</p>	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			<p>stated. TAs are required for developments greater than 80 dwellings and TSs are required for 35-80 dwellings. A Transport Report would be required for proposals 5-35 dwellings and would unlikely require junction assessments as impacts are unlikely to be significant. It is advisable that any site proponents enter into pre-application discussions with the Highway Authority to discuss the scope of a Transport Report before a planning application is submitted so it can be highlighted where assessments of the highway network are required (taking account of the site location and existing conditions).</p> <p>B – seeks that reports include consideration on the safety of active travel modes. Comment: Highway and transport related improvements sought as part of development proposals have to meet planning obligations tests and be commensurate to the scale of the proposal. For the smaller development proposals there may not be viability to address significant constraints such as footway widths or inclusions of cycle routes on the main network but would be expected to support improvements to local accessibility (e.g. dropped kerbs, tactiles etc) in the vicinity of the site.</p> <p>Clause C - proposals improve the flow of traffic and pedestrian safety, as well the</p>	<p>Suggest retain as this is only required for those developments requiring a TA/TS.</p> <p>Noted.</p>	<p>✓</p> <p>✓</p>

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			<p>environment will be supported. Comment: Such improvements to the High Street have been under discussion for a number of years.</p> <p>The policy and supporting text should emphasise the physical health and mental wellbeing benefits of increasing active travel in the area.</p>	Noted. The introduction to this section emphasises the health and wellbeing benefits of active travel.	✓
533.	WAD8: Mitigating traffic congestion	6	I feel the following sentence is open to interpretation: Proposals to improve the flow of traffic and pedestrian safety, as well as the environment, on these roads in the Neighbourhood Plan area will be strongly supported. What does this mean? Proposals to improve the environment will be strong supported? In what capacity is the word 'environment' being used here?	The SG has considered this comments. Whilst the policy applies to development anywhere in the Parish, it is only on the effects of such development on traffic and pedestrian safety and the environment on the specific roads identified in figure 7.4. Unclear as to how this is 'open to interpretation'.	✓
534.	WAD8: Mitigating traffic congestion	6	I live on Sparrows Green Road, close to the Primary School, and traffic is regularly at a standstill, especially at 'school run' times - the problem is exacerbated by, quite frankly, the ludicrous parking in both directions at the junction with the main road leading to and from the village itself. There are several 'pinch points' along Sparrows Green Road, and traffic regularly mounts the pavement in order to pass one another - this is obviously not only extremely dangerous to pedestrians (especially those with young children, pushchairs, dogs, etc), but also leads to extensive damage to the pavement surfaces and kerbs. With the amount	The policy identifies particularly challenging roads and junctions in respect of traffic volume and speed, in order to ensure that new development considers its impact on these specific areas proactively. The comment, from a local resident, confirms the problem WAD8 seeks to prevent from worsening.	✓

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			of development already going on in Wadhurst, this problem is made even worse due to the number of heavy commercial/construction vehicles passing through the village - vehicles are getting larger, roads are becoming narrower due to parking! Due to the aforementioned congestion, people are taking to the back lanes, creating 'rat-runs', that are also becoming increasingly dangerous.		
535.	WAD8: Mitigating traffic congestion	6	I live on Sparrows Green Road, and traffic is regularly at stand still (especially during school time) Vehicle regularly mount the pavement in order to pass traffic coming in opposite direction, Very dangerous for pedestrians, particularly children. During quieter times vehicles speeding is a regular occurrence, making it dangerous when trying to cross the roads, particularly at the cross roads - Turners Green and Primmers Green. Traffic is regularly at a standstill when trying to drive through the village	See Rep. 29.	✓
536.	WAD9: Car Parking Provision	5	Cycle parking is more likely to be utilised if it is covered and secure. Suggest including cycle shelters or covered secure cycle parking where appropriate. Consideration has been given to the provision of EV charging and e-bike parking facilities which is welcomed. Clause A - Comment: it is assumed that the off-street public car parking means public car parks	Amend Clause c (i) to include ' covered and secure '. Noted. Noted.	✓ ✓

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			and on street spaces relates to those areas in the High Street that are available for parking (even though in earlier narrative these are causing obstruction to emergency vehicles?) The High Street scheme that is ongoing seeks to address safety of vehicle flows and accommodating active travel, but to achieve this balance may result in rationing the level of on street parking. There is an ongoing problem in Wealden that parking is not decriminalised and so seeking to improve and expand public car parks to potentially address and offset the High Street parking problems would assist to overcome the wider issues. Long term parking in the public car parks caused by the college prevents short term visitor parking which results in on street parking.		✓
			Cause B - Comment: agreed but would need to secure the management of on street parking in the High Street.	Noted – add this into the action table in Section 13.	✓
			Clause C – Agree.	Noted.	✓
			Clauses D, E, F, G - Comment: accepted. Car parking standards are based on local car ownership figures and EV charging and cycle parking provision are required as part of NPPF guidance.	Noted.	✓
			Suggest the inclusion of wording to encourage development proposals that demonstrate clear	Noted. Could include an additional clause to this effect above Clause D.	✓

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			and measurable proposals to reduce car dependency.		
537.	WAD10: Employment retention and local economy viability	5	<p>Clause A iii: Employment/Highway - Comment: where commercial uses are introduced or form part of a change of use, section iii cannot be applied if the proposal is permitted use/development (i.e. does not require planning consent) the highway authority would not be consulted through usual planning process.</p> <p>Clause D: Residential development above shops/parking - Comment: this is difficult to enforce on the basis that the former use may already have had on-street parking demand. If Permitted Development, there may not be any way to control this.</p>	<p>Include caveat in A to state 'notwithstanding permitted development.'</p> <p>Include wording: "Notwithstanding permitted development rights.."</p>	<p>✓</p> <p>✓</p>
538.	WAD10: Employment retention and local economy viability	9	It is considered that the title could benefit from being re-worded and there are some inconsistencies between references within the policy (Section A and B) of which commercial uses are being referred to – Class E and also Class B2, B8 and F. This could be tidied up.	Amend Class references.	✓
539.	Local Economy	9	This section refers to the 'Town Centre and Retail Study (2016) prepared for WDC'. Our understanding is that there is a more recent and updated document prepared on behalf of WDC to inform their Local Plan work by Nexus Planning, and this should therefore be taken	The text has been amended to reference the most recent report.	✓

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			into account and referred to in the Wadhurst Neighbourhood Plan if relevant.		
540.	WAD11: Supporting sustainable rural tourism	5	Welcome that the Plan seeks to support Sustainable Rural Tourism, including green travel. Any new infrastructure or changes to existing infrastructure related to Tourism should consider appropriate sustainable infrastructure from the outset, including, but not exclusive to, Active Travel, EV charging, bike racks and drying rooms.	Noted – add in additional wording to the supporting text and add additional clause to the policy relating to the provision of sustainable infrastructure from the outset.	✓
541.	WAD11: Supporting sustainable rural tourism	6	I feel v. should be separated into: There is no significant detrimental impact on the existing community. And: There is no detrimental impact on the environment.	The SG do not consider that the suggestion in the comment would make any tangible difference to the application of the policy.	✓
542.	WAD11: Supporting Sustainable Rural Tourism	10	We note that there is in fact support towards overnight accommodation in Policy WAD11 and this is very much welcomed. However, on closer expectation, we note that this support only extends to the redevelopment of an existing building, “within its existing Use Class”. The policy, as drafted, seeks to limit sustainable rural tourism opportunities to existing buildings only, with no justification for this. We do not believe the supporting evidence is sufficiently robust to justify this approach. By restricting development to existing use classes only, the policy is clearly contradictorily and frankly unworkable. We therefore request that criteria i be deleted from Policy WAD11.	The SG are reflecting the views on this matter that were gathered from the Household Survey.	✓

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543.	WAD12: Communication Infrastructure Support.	6	The infrastructure of Wadhurst is crumbling. the sewage can no longer cope and as from now there is no indication that there are plans for improvement. the schools are full and worst of all the surgery now has 2 part time doctors for over 9000 patients. that is dangerous!	Noted. This policy is related to communications infrastructure. See also Rep. 54.	✓ ✓
544.	WAD13: Conservation of the natural environment, ecosystems and biodiversity	5	The policy needs to acknowledge the potential benefits to the population of Green and Blue infrastructure. Landscaping within developments and green corridors, which include walking and cycling opportunities, can provide benefits for health and wellbeing creating improved access to nature including the surrounding countryside. Reference should be made to how this supports healthy lifestyles, including mental health benefits. The policy could expand on off-setting the effects of air pollution for health benefits, as in para 9.1.	Noted. Include additional text in the justification to set out the physical and mental health benefits of the green and blue infrastructure network.	✓
545.	WAD13: Conservation of the natural environment, ecosystems and biodiversity	6	I suggest strengthening this policy and requiring all developments to have 'hedgehog highways' - see https://www.hedgehogstreet.org/help-hedgehogs/link-your-garden/ This should also apply should anyone wish to put up closeboard fencing.	Noted – suggest that wildlife friendly features are mentioned explicitly in WAD4, the design policy.	✓
546.	WAD14: Bewl Water Reservoir Area and Associated Public Activities	5	The policy and supporting text should acknowledge the physical health and mental wellbeing benefits of Bewl Water Reservoir Area. Reference should be made to maintaining and improving the accessibility of green spaces for all ages and abilities and improving the	Noted and included in the introduction to the policy.	✓

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			quality and linkages between this area and other local green spaces and key destinations.		
547.	WAD14: Bewl Water Reservoir Area and Associated Public Activities	6	Bewl Water is specifically mentioned in the National Parks and access to the countryside Act 1949 and the Countryside Act 1968 as a country park .. some of the clauses in which were ignored by Southern Water when their accountants decided it wasn't their core business and leased it out originally. Further leasees have ignored the Act even more and the allowing of recent planning proposals.. for holiday lets /camp sites etc is eroding this facility even more. Expecting the variously named Salomon/Markerstudy Leisure to reinstat a water users club house is laudable but as it would provide no income for them they will persist in planning to change it to residential use.	Noted.	✓
548.	WAD14: Bewl Water Reservoir Area and Associated Public Activities	9	This makes reference at paragraph 9.15 to the reservoir partly falling within Rother District Council area. Just for clarity, part of the associated reservoir area, also falls within Tunbridge Wells Borough Council area. However, TWBC welcome the inclusion of this policy and note that it primarily deals with public access, recreation, and nature conservation issues.	Noted – amend para 9.15 to clarify this.	✓
549.	WAD14: Bewl Water Reservoir Area	10	We acknowledge and are supportive of the provision of local community uses at Bewl Water. However, the current framing of draft Policy WAD14 to provide a community facility	The SG considers that the person making this representation is incorrect to state “not a public site” – Water Industry Act requires provision of access to public.	✓

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			<p>on site on a non-proprietary basis (i.e. not owned by any company) is naïve and unrealistic. The policy intervenes in the free market to such an extent that it is simply not workable or viable.</p> <p>In essence what is being sought is the gifting of land, a community building, for community uses and hitherto unspecified recreational uses with an absolute and total disregard to the commercial and practical realities of paying for and maintaining such a facility. It is not the purpose of the planning system or Parish Council's to unilaterally designate private land for non-profit community-based activities however laudable this may be.</p> <p>Para 9.25: Bewl is acknowledged as being regionally important for tourism and recreation. It correctly serves a wider regional population catchment – it does not exist for the sole use of the local community. It is a valued and important amenity/leisure/recreational space for everyone to enjoy and have access to – that includes those that reside beyond the Parish.</p> <p>The approach taken in Paragraph 9.25 is unbalanced with no appreciation of the economic and social benefits that overnight accommodation can bring to the area. Instead of resisting development at this part of Bewl,</p>	<p>Policy WAD14 is not designating “private land for non-profit community-based activities”, as alleged. The rep claims that “Bewl is acknowledged as being regionally important for tourism and recreation” but only Bewl & WDC acknowledge this, others do not. “It is a valued and important amenity/leisure/recreational space for everyone to enjoy and have access to” – all the more reason to protect it.</p> <p>The SG would seek to retain the concept of a club house that enable wider public access.</p>	

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			<p>the Neighbourhood Plan should be supporting the sensitive provision of overnight accommodation at Bewl through the conversion of existing buildings and in accordance with adopted policies and appreciate the benefits that such facilities bring to the wider community.</p> <p>With regards to the comment about sailing, it is important to note that when the current tenant started managing Bewl in 2016, the Sailing Club had already disbanded. Since taking over the site, Salomons UK Ltd have worked hard to bring sailing back to Bewl and to make it as accessible to as many people as possible. Meanwhile the company have also invested heavily in other water-based activities including windsurfing, fishing, standup paddle boarding, and open water swimming. Like sailing, membership numbers have increased across the board in all of the above-mentioned water-based activities.</p>		
550.	WAD15: Protection of distinctive and highly valued views	5	The policy and supporting text should emphasise the physical health and mental wellbeing benefits of protecting highly valued views.	Noted and include reference.	✓
551.	WAD15: Protection of distinctive and highly valued views	7	<p>Objects to inclusion of:</p> <ul style="list-style-type: none"> • View 2a and 2b from Cousley Wood Road/Primmers Green Lane junction southeast across Primmers Fields - It is the 	The SG has carefully reviewed the views identified in light of the comments received. Further information has been presented about how the views were identified, in collaboration with the wider community. All views are	✓

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			<p>view of the spire that is the critical factor. But, such views of the spire are not exclusive to this location. Being a tall structure, the spire is widely visible across Wadhurst.</p> <ul style="list-style-type: none"> • View 3 from Ben Grieg’s Garage forecourt - No physical attribute elevating the view’s importance is given beyond simply being a nice view “across open rolling AONB High Weald Countryside”. Furthermore, this is not a view freely accessible to the generally public. It is only when you’re on the forecourt (which is privately owned) when you can see the view. <p>These representations have been submitted on behalf of Mr Durnford who owns land to the east of Wadhurst and has submitted an application for 15 dwellings on land to the south of Cousley Wood Road (LPA Ref: WD/2022/1610/MAO).</p>	<p>viewable from publicly accessible locations. Additional justifications have been provided.</p> <p>The owners of Ben Greig’s Garage have publicised that they will be closing the garage shortly. Therefore, the site will become free for redevelopment. On this basis, this exemplary view from the site needs to be retained in any future development.</p>	
552.	WAD16: Local Green Spaces	1	<p>LG7: Ex Wadhurst College Recreation Field. It is noted that, other than the table on Page 124, there is no supporting text to provide further commentary or justification regarding the reasons for designating each site.</p> <p>Object on following grounds:</p>	<p>The SG have carefully reviewed the space and seek to retain it as a Local Green Space.</p> <p>Appendix E of the WNP contains detail about how the LGS list has been drawn up and, for each space proposed for designation, how the space is considered to meet the NPPF criteria. A rigorous process has been followed (based on Locality’s LGS guidance).</p>	✓

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			<ol style="list-style-type: none"> 1. The site is not in close proximity to the main settlement of Wadhurst. 2. The residential properties located south of the site are adequately served by green space within that development. 3. The site is not publicly accessible. It is used informally for dog-walking. 4. The site is not demonstrably special for wildlife purposes. 5. The site is not demonstrably special for beauty purposes. 6. The space is too large to be 'local in character' at 2.5 ha. 7. The site is already protected from inappropriate development by way of its location in the High Weald AONB. Part of the site is ancient woodland. 8. This is part of a wider site being considered as part of WDC's Direction of Travel Document and designating it as an LGS would preclude further consideration of that space. 	<ol style="list-style-type: none"> 1. The site is located amid the residential part of Mayfield Lane. It serves three residents, and also those living in the main village of Wadhurst, which is approximately 15-20 minutes walk from the space. As noted in the supporting justification, it is used by local brownie and guide groups and has a history of being used for sporting activities (notable lacrosse). The space is not considered to be remote from the community it is serving. 2. There is green space within the residential area to the south, but that provision does not negate the importance of the Space LGS7, which serves an additional set of purposes, as set out in the justification. Equally, site LGS7 serves not only the residences to the south, but a broader set of needs from the wider community. 3. An LGS does not need to be publicly accessible. There is a history of informal use, not only by dogwalkers but others for informal recreation. The recreational use of the space is not the only reason for its inclusion, rather it is considered to meet other NPPF criteria beyond just recreation, that would make it 'demonstrably special'. 4. Wildlife: The SG considers that the reasons provided in the justification adequately demonstrate how the space meets the NPPF criteria. An LGS does not have to be nationally designated as a wildlife space to be considered suitable for LGS designation. There is mature woodland and a pond on the site: ponds alone support two thirds of all freshwater species (Freshwater Habitats Trust). Part of the site is home to ancient woodland, which is recognised as an irreplaceable habitat. 5. Beauty: The SG considers that the reasons provided in the justification adequately demonstrate how the space meets the NPPF criteria. The space is the highest point in the 	

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				<p>parish and is informally visited as a point to view sunsets. It has not been included a specific view to safeguard as the access is informal.</p> <p>6. The Planning Practice Guidance does not define what is meant by 'local in character' in terms of size. There are many examples of LGSs in made NDPs that are larger than this space. The space has been considered in the context of: <i>whether it feels as though it is part of the local area? And why? How does it connect physically, visually and socially to the local area? What is your evidence?</i> The space is located close the residential areas of Mayfield Land and within a 15-20 minute walk of Wadhurst Village. It is well-used informally both by individuals and organised groups (e.g. the brownies) and is well-connected to the movement route network, bring located just north of the Mayfield Lane. As the highest point in the parish, it is well-known and noticeable and considered to be a feature of the wider village and parish.</p> <p>7. The LGS designation would offer greater protection than is offered by way of being in the AONB, by raising the level of protection to that of Green Belt. As noted by the representative, the space has been considered in the early stages of the emerging local plan, therefore it would be wrong to suggest that the space is adequately safeguarded against loss. The loss of the space would be significant to the local community for the reasons provided. Whilst part of the space is home to ancient woodland, which is protected, the space is recognised as a whole piece, and it would be counter to local knowledge to redraw the boundaries to exclude the woodland, which forms an intrinsic part of the value of the space.</p>	

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				8. The purpose of the LGS designation is to identify spaces that are demonstrably special to the local community. The current Local Plan was adopted prior to the introduction of LGS as a designation and the WNP is the first NDP document to be developed for the parish. Therefore it stands to reason that there will be a series of LGSS identified in the WNP that would not previously have been identified as such. The WDC emerging Local Plan is at a very early stage and is not adopted. Therefore it is not yet strategic policy.	
553.	WAD16: Local Green Spaces	5	<p>The policy and supporting text should acknowledge the physical health and mental wellbeing benefits of local green spaces. This includes health benefits of increasing physical activity through enabling more walking and cycling within the area and access to play and recreational areas. Reference should be made to maintaining and improving the accessibility of green spaces for all ages and abilities and improving the quality and linkages between local green spaces and key destinations.</p> <p>The safeguarding of the allotments is welcomed. They provide benefits not only healthy food but bring people together improving physical and mental wellbeing providing a source of recreation and wider contributions to green and open space. To maximise these benefits and to address identified demand the plan should also encourage and support opportunities for additional community food growing spaces at</p>	<p>Noted – include reference.</p> <p>Noted. Consider adding additional text to the justification table.</p>	<p>✓</p> <p>✓</p>

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			appropriate scales within developments and within existing public spaces.		
554.	WAD16: Local Green Spaces	6	Was Snape Woods considered?	Snape and Birchett's Woods are owned and managed by the Forestry Commission. Snape Wood is popular with local dog walkers, whilst Birchett's Wood, to the east, is less well visited. A beautiful mosaic mix of pines (old and new), coppiced chestnuts, birch, oak and other native species all criss-crossed with a network of wide sandy paths edged with heather. They are considered to be adequately protected.	✓
555.	WAD16: Local Green Spaces	6	How have you identified local green spaces to protect? Can more be added?	Appendix E details how the spaces have been identified. At this stage, it would be difficult to add additional spaces unless an owner was on board.	✓
556.	WAD16: Local Green Spaces	6	Although we are surrounded by fields and farmland, there is very little in the way of Green Space for public use i.e. dog-walking, exercise, etc. - this affects people's mental health and well-being - meaning that the only option is to use the road network, which as mentioned previously, is becoming more and more dangerous; a 'Country Park'-type area is required for all to use and enjoy - currently, the two recreational spaces available within the village (the Recreation Ground in South View Road, and the field behind the Commemoration Hall) both have limitations on who can use it i.e. 'No dogs', as they are both laid out for sports use; this therefore excludes large parts of the community, and needs to be redressed, with an area within walking distance of the village for all to use. There should also be no building/planned development allowed on AONB land, otherwise there is absolutely no	<p>Noted. The policy seeks to safeguard certain spaces that have are demonstrably special to the local community as Local Green Spaces. This would protect them against inappropriate development (in the same way as Green Belt land would be treated). The policy cannot create new space although Policy WAD4 (Design of Development) includes a clause related to the creation of green space as part of new major development.</p> <p>It is acknowledged, however, that the Parish is in need of additional public field/park walking areas and the Parish Council is currently looing for such land.</p> <p>The parish is designated as AONB, but this does not preclude development, as established in the NPPF. The WNP must be in conformity with the NPPF. Policy WAD1 (Location of Development) seeks to provide greater clarity as to where any development would be appropriate and where it would be less so.</p>	✓

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			point in designating it as such! The village would lose its historic 'feel' and look, and would just become a concrete and brick wasteland.		
557.	WAD16: Local Green Spaces	6	We have very little in the way of green spaces which can be used by the public to enjoy walking across fields and walking dogs (of which there are many in the village) We are in need of a country park type area for all to enjoy within walking distance of the village. There should definitely be no building on AONB land (otherwise what is the point of areas being designated as such).	See Rep. 51.	✓
558.	WAD16: Local Green Spaces	10	<p>Objection to the designation of the Bewl Water Reservoir Recreation Area (LG13) as a Local Green Space as consider it is being used to limit and constrain development at Bewl, which is a regionally important asset.</p> <p>Consider the space is</p> <ul style="list-style-type: none"> - too large to be a LGS. - Too far from the community it serves - Already has planning permission for 80 pitches for three years. <p>Consider that there is already adequate policy in place to restrict what can be done at the site (quoting numerous Local Plan policies).</p>	<p>The SG has carefully considered the representation.</p> <p><u>Too large to be a LGS:</u> There is no definition of what is meant precisely by “not an extensive tract of land” in either the NPPF or the NPPG. Government guidance on LGSs at Open space, sports and recreation facilities, public rights of way and local green space - GOV.UK (www.gov.uk) states “There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed.” A Report/analysis by CPRE page 13, https://www.cpre.org.uk/wp-content/uploads/2022/01/Feb-2022_CPRE_Local-Green-Spaces-full-report-1.pdf found the largest LGS in a ‘made’ NP was 46.5 Ha. (over 3 times the 13 Ha. size of LG13) and some “3.4% of LGSs are more than 10 Ha. wide”. The SG consider that the CPRE Report and Analysis is strong evidence to refute a size challenge.</p> <p><u>Too far from the community it serves:</u> The space is a valued site in Wadhurst and is accessed by the community regularly.</p>	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
				<p>It is also 2.9km from the centre of Lamberhurst, a further community it also serves, albeit outside the neighbourhood area, though still relevant to the site.</p> <p><u>Planning permission:</u> The Campsite planning permission is not for 7 months of yr. and is only temporary. This is not considered to conflict with the LGS designation.</p>	
559.	WAD17: Protection of Dark Skies	6	Roof lights are not an evil invention! They enable people to lighten areas at low cost that would otherwise be dark and unattractive (inside). They are a good compromise to larger windows and enable projects that would otherwise not be sensible. Overall, the Plan is very well presented and I thank those who have plainly put in a vast amount of work.	Noted - the policy has been worded using the official advice from the AONB Unit.	✓
560.	WAD17: Protection of Dark Skies	6	Great to see the dark skies policy is simple, clear and sensible. I couldn't see any reference to warm tones being preferential to cold tones of light which should be included - but appreciate this may have been in the Institution of Lighting Professionals (ILP) Guidance Note GN01.	Noted.	✓
561.	Para 10.2 and WAD18: Important Community Facilities	3	<p>Why is the existing GP surgery not listed under 10.2 as an important community facility?</p> <p>We feel that policy WAD18 should be altered so as to recognise the community ambition to deliver a new purpose build medical centre on a new site.</p>	<p>This is included as a major project aspiration in Section 12 of the Plan. It would be reliant on identifying a site and the NDP is not allocating sites at this time.</p> <p>Policy WAD1 (Location of development) sets out the criteria for development and where it would be most appropriate/sustainable in the parish.</p>	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			<p>We see that you are not allocating any sites, which is a shame. We wondered if you could develop the policy to set some criteria for replacement important community facility on new sites; sustainably located. Greenfield / edge of settlement? etc. it would be handy to have a checklist.</p> <p>Working on a proposal for a new health centre.</p>	<p>Policies WAD3 (Design and character of development) and WAD 4 (Sustainability and Design) set out more detailed design criteria and is underpinned by the Wadhurst Design Guide.</p> <p>Further discussions on this would be welcomed.</p>	
562.	WAD18: Important Community Facilities	5	<p>Infrastructure projects which increase physical activities and improve and increase play and recreation are supported. The plan should emphasis the physical health and mental wellbeing benefits of providing these additional community facilities and the importance of connected accessible places for all to meet reducing social isolation and improving the social cohesion of the area. As mentioned above proposals should also refer to community food growing opportunities in addition to allotments.</p>	<p>Noted and include reference to this.</p>	✓
563.	WAD18: Important Community Facilities	6	<p>The current situation with the Doctor's surgery is extremely worrying (2 part-time doctors to serve 9000+ patients?) - further development would only make the situation even worse! The sewerage problem is an ongoing issue, and any new developments would only make the situation even worse, along with issues such as rain-water run-off - flooding could easily become a major problem in certain parts of the village.</p>	<p>The situation regarding GP provision is a national issue and one that largely falls outside the scope of neighbourhood planning – the provision of additional GPs would require investment and interest from a GP willing to operate such a facility. There is a national shortage of GPs.</p> <p>In terms of sewerage, Southern Water may have to provide additional wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to</p>	<p>✓</p> <p>✓</p>

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
				connect into existing networks. Planning policies should therefore support proposals that come forward in order to deliver necessary wastewater infrastructure. Section 12 addresses this at the neighbourhood level.	
564.	WAD18: Important Community Facilities	6	It is a very worrying situation with only 2 part time doctors and over 9000 patients. The sewage problem is ongoing and with new house building can only get worse	See Rep. 58.	✓
565.	Section 12	2	To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy for inclusion in Section 12 of the Plan as follows: New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan.	Noted and add to the end of Para 12.1.	✓
566.	Section 13	3	Welcome the fact that section 13 item D9 recognises the need for a new health centre. Although it is noted that this has not been developed into a specific policy.	The NDP is not allocating sites. A new or expanded health centre is supported in the NDP as a major project that could be brought forward through Community Infrastructure Levy or through a strategic development in the emerging Local Plan.	✓
567.	Section 13	5	The list of aspirations and possible actions for Wadhurst is useful. However, from an ESCC perspective many of these could only come forward subject to the availability of funding. They would also require significant partnership working from the Parish Council, to enable these to come forward.	Noted.	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
568.	Section 13	6	It is important that if there is development in the parish, then the local community should be seen to benefit from it (through the CIL/S106 process) - whether that is via provision of a new medical centre or a swimming pool.	Agreed and Section 13 sets out priorities for local investment.	✓
569.	Section 13	6	Supportive	Noted.	✓
570.	Section 13	6	It would seem the village would like an outdoor swimming pool. even more popular would be a wild park to walk in. There is suitable a suitable site within the village.	Noted.	✓
571.	Section 13	6	A reliable park and ride would be great as would a shuttle bus to the station.	Noted.	✓
572.	Section 13	6	Community aspirations are very important as they are about the health of the Community. However they are merely tagged on to the back of our Neighbourhood Plan when they should be very much part of it. The original survey done in Wadhurst showed that Residents wanted a lido style outdoor pool, somewhere safe to walk dogs and a wild park. I see no focus at all on the welfare and well being of Wadhurst residents whose quality of living is rapidly diminishing in the face of a 'development no matter what' policy.	Noted.	✓
573.	Section 13	6	All agreed. I particularly support: improvement to walking/cycling access to reduce congestion; relocation of GP surgery to improve size and services; new swimming pool. I would also like to see the reinstatement of a recycling centre in Wadhurst.	Noted.	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
574.	Section 13	9	<p>It is noted that the provision of infrastructure to support any new development is considered to be a key issue and also a number of community aspirations are set out within the document and the survey. These include the aspiration for a variety of infrastructure facilities, including better health facilities – a new health centre as well as leisure and recreation facilities. The desire for such infrastructure is recognised and it may be that such infrastructure may be used by some residents of Tunbridge Wells Borough who reside in some of the rural areas on the boundaries with East Sussex/Wealden/Wadhurst – such as rural Lamberhurst and Hawkhurst. Likewise, it is assumed that some residents of Wadhurst utilise infrastructure within Tunbridge Wells Borough. It would be helpful to be kept updated with any of these projects as they progress and for discussions to be had with neighbouring infrastructure providers such as the NHS Kent and Medway Clinical Commissioning Group at an early stage who have useful ‘practice mapping’ which may be helpful in discussions – we are happy to provide such contacts as relevant.</p> <p>We note the reference to improvement of access/recreation links – pedestrian and cycle between Wadhurst and Bewl Water, which straddles the boundary with TWBC. The Council</p>	<p>Noted.</p> <p>Noted.</p>	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			would be supportive and would be happy to work with Wadhurst Parish Council on such projects, which would aid in leisure and recreation connections which could also have a positive impact on tourism and the rural economy.		
575.	Further comments	6	I would have liked to see a policy where the availability of services that are essential to the local community is taken into account when deciding whether to approve further development. I am particularly thinking of local GP services, local schools and traffic infrastructure. It seems to be that, with the proposed plans, we could be in a situation where a new development is agreed that meet the requirements of all the policies but also has a significant impact on the services I mentioned above. This is also true when lots of smaller developments are agreed, leading to a cumulative effect that can be significant. I think developers should be required to either create their own infrastructure for example a new health centre or contribute a sum of money earmarked for such improvements. A good example of something like this was Jempsons which was required to include many parking spaces as part of their building plans.	Noted. The provision of infrastructure is considered as part of the emerging Local Plan, which is allocating sites across the district. The WNP must be in conformity with the strategic policies and it would be for the relevant authorities (e.g. Education Authority, Highways Authority, Primary Care Trusts etc.) to set out where additional facilities are needed to meet the quantum of development as proposed in the emerging Local Plan. The WNP does not have the remit of determining the adequacy of provision of a particular service, rather that is the responsibility of the umbrella service provider. Where possible, the policies of the WNP seek to support the various agencies to do this. In addition, Policy WAD18 identifies facilities of particular local importance that should be safeguarded against loss.	✓
576.	Further comments	6	This Plan focuses mainly on development, which is very important, but what about all the other critical issues in Wadhurst....What about the the massive traffic problems in Wadhurst,	Noted. The purpose of the neighbourhood plan is to set out policies to guide land use and development as well as enable decision making in respect of planning applications. The factors that are mentioned in the rep are considered	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			the lack of parking, the lack of pavements?! What about the crisis situation at our doctor's surgery where we now have just 2 part time GPs serving 9000 patients?! The guidelines say one full time GP per 2000 patients.....And what about the sewage crisis in Wadhurst which has been allowed to develop unchecked for over 30 years which has led to our two sewage treatment plants being unable to deal with the sewage from the village so much so that sewage tankers have to come in the middle of the night to cart it all away. This is all insanity and you plan to build yet more houses before any of these major issues are resolved	throughout the document and have been used to help develop the policies. But some issues are not planning or land use per se and these are included in Section 12 and 13 of the WNP.	
577.	Further comments	6	A lot of work has gone in to it. It would be a travesty if the District Council sought to dilute it, delay it or generally try to 'de-fang' the Plan	Noted.	✓
578.	Further comments	6	Thank you so much for such an informative report.	Noted.	✓
579.	Further comments	6	Thank you for a really good report and plan.	Noted.	✓
580.	Further comments	6	At last!!! It has been years coming.	Noted.	✓
581.	Further comments	6	Clearly a lot of work has gone into this	Noted.	✓
582.	Further comments	6	I strongly support the suggested plan. What a fantastic way to preserve our lovely village, beautiful architecture, green spaces in sustainable and sympathetic manner.	Noted.	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
583.	Further comments	6	This is a historic, medieval village enjoyed by all who live here. It has 2 B roads going through the village, the other roads are old drovers lanes. the village needs starting homes not any more million plus houses. There should be no land banking. Every new development means more pressure on the existing residents as the existing infrastructure cannot cope at the moment. That does seem to have been acknowledged .	Noted. The quantum of development is set out at a strategic level. The Plan (and its evidence base) has set out great detail on existing and potential future pressures on infrastructure.	✓
584.	Further comments	6	It is a well constructed excellent document.	Noted.	✓
585.	Further comments	6	Housing numbers as dictated by the Government are way too high and inappropriate in small rural communities and do not take into account the impact on rural villages such as Wadhurst which are being ruined by inappropriate and excessive housing development. The needs of our local communities are being totally ignored and the destruction of historic sites overlooked in this moneymaking frenzy. We need more houses but not 5 bed 1.5 million pound houses on precious AONB sites which make the most amount of money for developers to the detriment of historic villages and their local communities.	Noted. Policy WAD2 (Meeting local housing needs) seeks to address this.	✓
586.	Further comments	6	We have been badly impacted (multi major developments beyond the development boundary on HWAONB) by Wealden's lack of 5 year household by land supply / lack of and updated Local Plan since 2016 - need this	Noted.	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			planning rule removed by Government altogether.		
587.	Further comments	6	Responsibilities, actions and provision of infrastructure service providers like East Sussex Highways, the Clinical Commissioning Group (CCG) and East Sussex Education are deficient and not focused on Wadhurst's existing severe service problems (traffic congestion, poor GP services, under capacity of classrooms/teachers leading to too many pupils per class) for Wadhurst Parish. Parishioners are suffering daily because of these deficiencies. No further major housing development should take place until these problems are fixed.	Noted.	✓
588.	Further comments	8	No significant comments.	Noted.	✓
589.	Further comments	9	<p>The document could benefit from some further formatting – often double spaces are provided between paragraphs which extends the length of the document and policy boxes. Reducing this would make a more succinct document. I note our previous comments on the formatting of the policies within the document have been taken into account and are welcomed.</p> <p>There is concern that the document as drafted may not be 'Accessibility compatible'. For example, it is not easy to read a number of the figures e.g. Figure 10 - The ten principles of design, National Design Guide, Figure 6.3: Summary of the Wadhurst Design Code scope,</p>	<p>Noted – review formatting before final submission.</p> <p>The document itself has undergone an accessibility check in terms of layout, alignment of text, labeling of figures. The maps and figures themselves may need to be enlarged to assist readability.</p>	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
			and Figure 6.4: Map showing the Conservation Areas, listed heritage assets in Wadhurst Parish.		
590.	Design Code	6	The Design Code is crucial. Too much development in Wadhurst has not paid attention to the guides available (Wealden or High Weald) so that building has looked out of keeping with that of a medieval village in East Sussex (a good example being Waters Reach).	Noted. The Design Code document is an integral part of the WNP.	✓
591.	Design Code	6	Fine in the conservation area, and as a general uniform appearance, but as stated above, don't throw away good architectural design. Without a change in look, we will be wrapped in aspic and looking at anywhere (city, town or village) if they all looked the same, we would be very bored!	The policy does not limit innovation in design.	✓
592.	Design Code	6	Extremely well crafted. Fully support.	Noted.	✓
593.	Design Code	6	Any proposed development within the village MUST be designed in such a way to fit in with all of its surrounding properties, in both look and size, and so avoid this 'modern' look of partially wooden-clad, faceless monstrosities that take away the character of the village.	Noted.	✓
594.	Design Code	6	To have a design code in keeping with a medieval village would be amazing. Houses should be in keeping with this historic village. No more cul de sacs. layouts should be in keeping with the village. All new housing should be well insulated and no more gas boilers.	Noted.	✓

Ref.	Page/ Para	Rep.	Summary of comment	Response from Steering Group	✓
595.	Design Code	6	The Design Code is an excellent idea and one that we would hope will have some impact on future development. So far developers have been allowed to build wholly inappropriate houses in cul de sac layouts which do not mirror the housing styles in Wadhurst nor the layout of the Village.	Noted.	✓
596.	Design Code	6	I agree with it.	Noted.	✓
597.	Design Code	6	More green space for walking / dog walking within Wadhurst required (not just muddy/restricted footpaths).	Noted.	✓

APPENDIX D Summary of Regulation 14 (Phase 2) feedback from WDC on the WNP

Wadhurst Neighbourhood Plan Phase 2 Regulation 14 Consultation – Response from Wealden District Council (February 2023)

This is the response received from Wealden District Council (WDC). The first section contains their general comments, beneath which the Steering Group has provided a response **(in bold)**.

The second section comprises a detailed table of WDC's comments and the Steering Group has again provided a response to each of these.

General Comments

Contributing to Sustainable Development

The Wadhurst Neighbourhood Plan (WNP) is not seeking to meet the future housing needs of the neighbourhood area or allocate sites and paragraph 1.13 and chapter 11 confirms that this position will be reviewed once a Local Plan is adopted. Future housing and other development needs in the neighbourhood area will therefore be addressed through the Local Plan process.

SG comment: The WNP is not seeking to allocate housing sites, but the WNP policies do support meeting future housing needs. Future housing needs in terms of numbers of homes required are to be set out in the emerging Local Plan. For the current Local Plan, the Parish has met its requirement in terms of number of homes delivered and detail of development delivered since 1 April 2013 is provided in Appendix B of the WNP.

Policy WAD1 of the WNP provides a spatial strategy for the Parish and seeks to ensure that any development is directed to the most sustainable locations, i.e. within the development boundaries, where development would be located close to facilities and reduce the need for car reliance. A strong emphasis of the WNP is to conserving and enhancing landscape and scenic beauty in the High Weald AONB.

Policy WAD1 also supports the development of brownfield sites in preference to greenfield. Furthermore, Policy WAD1 seeks to ensure that coalescence between settlements is prevented in order to retain the distinctive character of the individual villages and hamlets that have evolved historically in the Parish.

Once the Local Plan is adopted, the WNP can be reviewed to consider if the adopted plan (in addition to any update national legislation) warrants any amendments being made to the WNP.

The Council has considered the environmental designations proposed within the WNP and notes that many of the proposed environmental designations e.g. green gaps and locally valued views cover sites that have been submitted to Wealden as part of its Strategic Housing and Economic Land Availability Assessment (SHELAA). In effect, the designations could result in limiting the supply of potential housing sites and the number of dwellings that can be delivered on these sites to meet the housing needs of the local community in Wadhurst.

SG comment: The WNP does not seek to stop development, rather it seeks to ensure that development that does take place occurs in the most sustainable locations. This will normally be

within the defined development boundaries as these are the locations that are closest to local facilities. Outside the development boundaries, the WNP seeks to limit development with the emphasis on conserving and enhancing the landscape of the High Weald AONB. These locations should already be subject to paras 176 and 177 of the NPPF, which state that major development is only permissible in exceptional circumstances. All of the sites identified in the SHELAA within Wadhurst sit within the High Weald AONB on greenfield sites outside the development boundaries. The WNP has been in gestation for over six years. The WNP, in advance of the SHEELA work, has sought to identify areas of the Parish that would be particularly vulnerable to coalescence and/or which are demonstrably special to warrant additional restrictions. There is a concern among the WNP Steering Group that some sites have been put forward to WDC because they have been identified as being particularly sensitive in the Parish.

Development has taken place in Wadhurst outside the development boundaries in the past due to the lack of a 5 year housing land supply on the part of WDC. Additionally, a number of the sites proposed for development in Wadhurst in the now withdrawn Local Plan are on sites that had been identified as not suitable in previous iterations of the SHELAA. The WNP is seeking to restrict vulnerability to this.

Work on the WNP has been taking place for many years and the aspiration to identify green gaps, important local viewpoints and local green spaces has been set out during this time. This work in fact predates the SHELAA.

The Council published its SHELAA Report alongside the now withdrawn Wealden Local Plan in 2019 and is currently in the process of updating its SHELAA to inform its emerging Local Plan. This includes reviewing the suitability and deliverability of all sites submitted, this includes both previous sites that were submitted and reported on in the SHELAA 2019 publication as well as new sites that have been submitted since this date. The SHELAA review will be published alongside the Local Plan Regulation 18 consultation once this takes place in 2023 and will assist (alongside other evidence) to inform the Council's growth strategy. However, in the interim the vast majority of sites submitted to the Council for its SHELAA are available to view via the Council's online mapping system.

Policy WAD4 also seeks to resist major infrastructure developments. Please see comments in the table below on this. This is despite paragraphs 153 and 155 of the NPPF stating that (local) plans should take a proactive approach to mitigating and adapting to climate change and should help increase the use and supply of renewable and low carbon energy and heat. If it is major development within the AONB (according to NPPF para 177), would the NPPF not suffice by stating that permission should be refused for major development other than in exceptional circumstances, alongside other landscape policies?

SG comment: Policy WAD4 seeks to ensure that all development is designed in a way that contributes to mitigating climate change. Clause C states that "Major infrastructure developments (such as: Solar Farms, Wind Turbines or Wind Turbine Farms, Fracking, Mining, Gas/Nuclear or Power) that would impact the visual beauty, tranquillity or character of the High Weald AONB will be resisted".

Feedback from the community has established that whilst community-scale energy schemes may be suitable to the area (which aligns to the High Weald Management Plan Objective G3: "Support, where possible, landscape-sensitive, small-scale renewable schemes tailored to AONB conservation), large scale energy generation schemes would be unsupported. Whilst Para 177 of the NPPF does state that major development is only permissible in exception circumstances, this

has the caveat that the definition of what constitutes ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. The WNP in Policy WAD4 seeks to define ‘major development’ in the context of energy generation schemes, hence adding additional local detail the NPPF and WDC strategic policy, the latter being largely silent on these issues.

Conformity References

Any references to policies that do not form part of the development plan e.g. the High Weald AONB Design guide should be removed.

SG comment: The inclusion of the High Weald AONB Management Plan objectives is there for information for those reading and applying the policies. The SG would like to retain these as whilst they do not form part of the Development Plan, they do provide additional important context given the High Weald location of the Parish.

Conformity references need to be checked again, in particular the core strategy references, as sometimes they do not directly relate to the policy in question. We have not noted these specifically in our advice, however, we do advise for the WNP team to check these are correct and update accordingly for the WNP Regulation 16 Submission version.

SG comment: The conformity references have been checked and are explained fully in the Basic Conditions Statement, which accompanies the Regulation 16 Submission Plan.

Accessibility

The document does not meet accessibility requirements. As per our advice sent to the Steering Group on 13 July 2022 please ensure that all WNP documents, including supporting documents, meet the accessibility requirements prior to submitting the WNP under Regulation 16 of The Neighbourhood Planning (General) Regulations 2012 (as amended) to the Council.

SG comment: The WNP and supporting documents have been prepared and checked against the accessibility criteria in MS Word (which is encouraged by the guidance) and meets them.

[Digital Accessibility Requirements For Third Party Suppliers of Content - Wealden District Council - Wealden District Council](#)

Policy Refinement

Whilst it is noted that the Neighbourhood Plan is more structured than previous iterations, with supporting text to support the policies and appendices to show the methodology of designations, there is still room to make the policies more streamlined and avoid repetition. For example, the design policy duplicates some of the design code and at three pages long may be difficult to navigate by applicants and Planning officers.

SG comment: The SG agree that the policy is very long. Whilst the Design Code forms an integral part of the WNP, there is a concern that detail may be lost hence the wording of the policy. The SG have discussed the matter and have decided to retain the policy text as stated (with minor modifications resulting from the detailed feedback gained at Regulation 14 (Phase 2)).

References

At times hyperlinks are used within the text to provide links to other documents but elsewhere footnotes are used. In other cases there are no references at all, for example when referring to the National Model Design Guide in policy WAD 3. There needs to be consistency in the document and just one referencing system used throughout.

SG comment: The accessibility requirements suggest that footnotes should be restricted. These have therefore been removed. All documents referred to in the WNP are detailed in Section 16 (List of Evidence). In addition, where an external document or guidance is mentioned in the text, a hyperlink has been inserted.

Policy Map

It would be useful to have a single map showing all the proposed designations i.e. Green Gaps, Views and Local Green Spaces. I can confirm that the Parish Council will need to provide the GIS layers associated with the NDP when you submit the Neighbourhood Plan to us under Regulation 15 so that the District Council can use this data for inclusion on our policies map for the district. These appear to have been digitised, but if this is not the case, then please let us know.

SG comment: It is accepted that MS Word is restrictive in the ability to display a Policies Map that is readable and useable, for instance without being too cluttered. For this reason, some of the policies rely on separate mapping contained in the relevant section. A copy of the GIS layers will be provided to WDC on submission of the WNP so that the mapping can be digitised as part of WDC's online mapping, which enables users to select individual layers to show, which in turn enables more effective usability.

Appendices

Currently some of the appendices are at the rear of the WNP document and others are provided separately. D and E are both at the rear of the document and separate. Those appendices which you have separately could be removed from the rear of the Plan document which would avoid confusion and also shorten the document. Overall a consistent approach would be helpful.

SG comment: It is considered that this is not an unusual approach for neighbourhood plans and there are many examples of NDPs doing so. The Group has agreed to retain Appendices in the WNP document, with the exception of those that are either too long or which are provided in a format that is incompatible with Word. All of the Appendices form an integral part of the WNP.

Message from the Wadhurst Neighbourhood Plan Steering Group – What's happened since the summer 2021 Regulation 14 consultation

Within the letter it is stated that:

‘A review of the subsequent draft Plan by Wealden District Council (WDC) Planning resulted in further challenging and demanding responses by WDC. To support and reflect Wadhurst's residents' opinions and wishes from the first phase consultation, the Steering Group engaged in ongoing and often lively discussions with WDC’.

It should be noted that in reference to the matter of ‘further challenging and demanding responses’ the District Council has provided support and advice to Wadhurst Neighbourhood Plan Steering Group throughout the process. This has included providing legal advice in relation to the significant changes made to the WNP following the first Regulation 14 consultation and also the introduction of a Design Code for Wadhurst, which had not previously been consulted upon. The District Council considered that the community should have an opportunity to comment upon what is in effect a new WNP and a design code. The District Council has also provided ongoing advice to the Steering Group with the aim to assist the Steering Group and the WNP to meet the Basic Conditions and proceed to examination and referendum. Without proper consideration and formal consultation, it was considered that the NDP was at risk proceeding further.

In addition to this, the same letter also comments on WDC requiring the amended plan to undergo screenings for Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA) and comments on the lengthy process. Please note that the requirement to re-screen the WNP for SEA and HRA was required based on the significant updates to the WNP and the introduction of a Design Code. There is a statutory period for consultation of five weeks as part of this process with Statutory Consultees, alongside the time required by District Council Officers, to re-screen the plan based on the significant updates made. Every Neighbourhood Plan is subject to the same SEA/HRA screening requirements, it is not just Wadhurst and this is a required legislative process.

Green Gaps (Appendix A)

Wealden District Council provided comments on the Green Gap designations as part of the first Regulation 14 consultation and many of our previous comments still apply and remain valid.

The Council has concerns regarding the proposed Green Gap designations set out in the draft plan. The WNP seeks to designate 9 ‘Green Gaps’. The Plan explains that ‘the identification of green gaps will help to avoid sprawl and coalescence between the individual settlements and those beyond the Parish boundary’ and this is further elaborated in Policy WAD1. The plan at Figure 4.2 and Appendix A sets out the identified green gaps.

There is currently no strategic policy contained within the district’s development plan framework relating to green gaps and coalescence and therefore it could be questioned as to how an additional designation for green gaps is in line with the Council’s strategic local policies. For example, within the Examiner’s Report for the Ringmer Neighbourhood Plan the Examiner indicated that they were to delete their proposed green gap policy and the fact that there is no adopted Green Gap Policy in the Lewes Local Plan and no Green Gap Policy in the framework was raised as an issue. Notwithstanding this, the Council’s observations and comments on the proposed green gaps approach and the green gaps themselves are set out below.

SG comment: Whilst there is no strategic policy within the WDC Development Plan relating to this matter, this does not preclude the NP from including such requirements. The NPPF, in Section 12, emphasises the important role that communities, including through their Neighbourhood Plan, can play in defining the characteristics that contribute to local character. Within Wadhurst, safeguarding against the coalescence of the individual communities that the Parish comprises, alongside the conserving and enhancing of the landscape, is an important part of this local character. Policy WAD1 defines those areas that are considered most vulnerable to the erosion of this.

General comments

The location of the sites are in many cases not located in an obvious gap between settlements where coalescence is a risk. On this basis it is difficult to understand how the creation of green gaps at such specific locations are justified or indeed how they would meet the basic conditions. For example, why would the protection of these specific sites prevent coalescence or contribute to the identity of a settlement alone? The Examiner's report on the Storrington, Sullington and Washington Neighbourhood Plan from 2018 [here](#), is one example where the Examiner requested the Steering group to remove a number of proposed greengaps from the Plan because there was no chance of settlement coalescence, there being no settlements to be coalesced with.

SG comment: Ribbon development is the forerunner of coalescence. Coalescence does not mean a one field gap between communities but a distinct whole green area between communities. The WNP has only designated the first field as a Green Gap within the green area in order to protect the whole green area between communities. All Green Gaps are within the High Weald AONB.

All of the green gaps identified are located within the High Weald AONB. They are also located outside of the current defined development boundary. On this basis there are already existing national and local policies that apply to each of the green gaps identified. In addition, certain sites are also located within or adjacent to Conservation Areas. Section 72 of the Planning Listed Buildings and Conservation Areas Act 1990 requires special attention be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area. Saved policy EN19 of the 1998 Local Plan states that within Conservation Areas, proposals which do not preserve or enhance their existing character, scale and visual amenity will be resisted. The NPPF also seeks to conserve the significance of heritage assets (including Conservation Areas as designated heritage assets) including any contribution made by their setting. The existing policy position therefore is to limit the scale and extent of development in these locations. Given that the sites are located within the High Weald AONB and are outside a development boundary and in considering the wording provided at part C of the WAD1 policy, we do not consider that the identification of the nine sites are required. The Examiner's report on the Battle Neighbourhood Plan in 2021 [here](#), is one example where again the Steering Group were asked at examination to remove a number of the green gaps because they did not perform the purpose of a gap which is to prevent the coalescence of settlements. However, the Examiner also referred to the fact that the areas identified as green gaps are all outside the development boundary and within the AONB, which offers the highest level of landscape protection. He states that from his research these policies have been used successfully to defend at appeal planning refusals.

There is also a clear overlap between the Green Gap designations and sites submitted to the District Council's SHELAA. Green Gaps 1, 2, 5, 6, 7 and 9 have all been put forward by landowners for consideration to meet future housing need. The Wadhurst NDP is not planning for housing or allocating sites. Therefore, the Council will assess these sites as part of its SHELAA review and will consider how best to meet its housing need across the district including in Wadhurst. Whilst it is too early in the Local Plan process to know what the housing requirement for the parish may be the Planning Practice Guidance (PPG) is very clear that a neighbourhood plan should plan positively and should not be used to constrain the delivery of a strategic site allocated for development in a local plan. The WNP must therefore have regard to the NPPF's emphasis on the need to deliver sufficient homes and the need to achieve sustainable development. These are basic conditions that must be met.

SG comment: As previously stated, the WNP has been in gestation for over six years and the identification of the green gaps, which are considered to be most vulnerable from a coalescence, landscape and character perspective, were identified in advance of sites being submitted to the SHELAA and subsequent SHELAA review.

It is concerning that the potential purpose of these designations appears not to be preventing coalescence of settlements (as stated) but rather, in some instances, constraining available sites from coming forward for development and indirectly influencing the future strategic allocation of housing in the Parish. There is a significant risk that this approach would not meet the basic conditions.

SG comment: The SG has carefully considered the comments. As previously stated, the WNP has been in gestation for over six years.

Wadhurst Parish is distinctive because of its numerous small distinct communities. This means that there are plenty of distinctive settlements that are in danger of being merged through coalescence. The primary coalescent dangers are Sparrows Green with Woods Green, Wadhurst village with Primmers Green, Sparrows Green with Pell Green, Wadhurst village with Durgates.

The identification of areas considered to be particularly vulnerable (from a landscape, character and coalescence perspective) has been in the public domain for much of this time. It is the fact that the sites that have been put forward in the Parish as part of WDC's new Local Plan work have emerged subsequent to the identification of vulnerable locations. Whilst these sites may be available for development, the SG do not consider them to be suitable.

Object S2 of the High Weald Management Plan supports this approach:

Objective S2
To protect the historic pattern and character of settlement.
Rationale
To protect the distinctive character of towns, villages, hamlets and farmsteads and to maintain the hinterlands and other relationships (including separation) between such settlements that contribute to local identity.
Indicators of Success
i. Physical and perceived separation between settlements maintained (HWJAC: settlement separation mapping)
ii. Greater proportion of new homes delivered through re-development or small developments (HWJAC: local authority statistics)

Specific Green Gaps

The settlements of Durgates and Sparrows Green have already coalesced, a fact that is underlined by the existing development boundary. However, the distinct differences between this Durgates/Sparrows Green and the Wadhurst High Street / 'Wadhurst Village' areas is recognised in planning policy documents in Wealden (see Local Plan 1998 para 19.37.13).

The NP proposes two Green Gaps within this area. Proposed Green Gap 8 forms part (but not all) of the Wadhurst Castle Grade II Registered Park and Garden, which is a Designated Heritage Asset,

where there is already a policy presumption against loss or substantial harm, except in exceptional circumstances. Green Gap 7 is located within the Wadhurst Conservation Area. It is identified as a key open space within the associated conservation area appraisal. Panoramic views across the site to the High Weald AONB are also highlighted as important in both the Conservation Area Appraisal and the draft neighbourhood plan. Both GG7 and GG8 are located outside of the development boundary and both are located within the High Weald AONB. As set out above, the Council considers that suitable policy protection already exists for both GG7 and GG8 and therefore the designation of a green gap is not required.

SG comment: The WNP seeks to identify areas considered to be most vulnerable, within the protected AONB, from a coalescence, local character and landscape perspective. Whilst WDC consider that proposed GG7 and GG8 are adequately protected, by way of being located in the AONB, the lack of a five year land supply and the identification of sites outside the development boundary within the AONB demonstrate that this alone is insufficient to safeguard such vulnerable sites from development.

Green Gaps GG3 and GG6 are small parcels of land located between Sparrows Green and the small hamlet of Pell Green. The proposed Green Gaps are within the setting of the Pell Green and Cousley Wood Conservation Area. Pell Green being added to the existing Cousley Wood Conservation Area in 2017. Existing heritage designations are therefore likely to help preserve the distinction between the two settlements following the conservation area designation. The District Council does not consider that there is justification to allocate a green gap at sites GG3 and GG6 as again protection in these locations is provided by national and local policy by way of the High Weald AONB designation and in considering the development boundary. Any development, in these locations would be subject to the NPPF test at paragraph 177 in any case.

SG comment: Para 177 of the NPPF states:

177. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development⁶⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

It does not preclude development. The issue of coalescence is not specifically noted in para 177 and these two spaces are considered to form a separation between the settlements of Pell Green and Primmers/Sparrow's Green, therefore the SG have agreed that they should be retained in Policy WAD1.

The WNP explains that the purpose of GG9 is to prevent coalescence between Sparrows Green and Woods Green. GG9's role is perhaps more accurately to keep a gap between Sparrows Green and the small row of properties at Osmer's Hill. The distinction is already eroded to some degree with continuous development on the western side of Osmer's Hill as it crosses Balaclava Lane. Whilst the designation would retain a gap when viewed across Balaclava Lane there is not, in the Council's view, sufficient distinction between Sparrows Green and the row of houses at Osmer's Hill to warrant a Green Gap designation. Again, land at GG9 is a site that has been submitted to the Council's

SHELAA. It is again located within the High Weald AONB and outside the existing development boundary.

SG comment: As per comments above. GG9 (and GG3) represent a clear protection definition of green farming land (with woodland between them) from development expansion into the AONB countryside and towards Osmer's Hill, Pell Green and eventually Woods Green.

Green Gaps 1, 2, 4, 5, in the Council's view appear to serve no role in preventing coalescence, not being located in gaps between settlements, and are not supported.

SG comment: A distinctive gap that is considered very important to parishioners is the gap between Primmers Green/Pell Green and Wadhurst village, which the Green Gap GG5 seeks to protect.

Similarly, GG1 is protecting ribbon development from Wadhurst village to Shovers Green / Wallcrouch (already breached by the Rydon Water Reach estate in the adjacent field).

Green Gaps 2 and 4 protect land between Local Green Space LG12 / LG11 which have had recent development applications.

GG2 has a pending development application and is the first field to protect ribbon development towards Woods Green settlement.

It is also noted that GG1, GG2, GG5, GG6, GG7 and GG9 are also sites submitted to the Council's SHELAA.

SG comment: These sites have been submitted to WDC's SHELAA subsequent to having been proposed for designations as green gaps in the WNP.

Response to previous Regulation 14 consultation

In its previous comments to you, Wealden District Council recommended that the approach to Green Gaps is reviewed. Should the Neighbourhood Plan steering group wish to continue to designate green gaps then our advice is for the evidence base / justification within the neighbourhood plan to be expanded to clearly justify the approach and provide sufficient reasoning as to why specific green gap designations (if any) are needed/justified in light of the existing policy protections. We note that a methodology and selection criteria has now been provided. The methodology could be stronger and could be more locally specific, e.g. who selected the sites? Who carried out the assessment? Also, the visual character criteria has not been finished. You have assessed each site as to whether it meets the criteria for designation and discussed the role it plays in keeping settlements separate. However, this has not been approached in a way that references relevant evidence base documents. This would assist in your justification.

Ultimately it is our advice that you will need to provide more robust evidence that development within the green gaps you have identified will either individually or cumulatively result in coalescence and the loss of the separate identity and amenity of nearby settlements. You will also need to demonstrate that existing local or national policies are unable to provide the protection that you seek.

As above, our advice stands that Green Gaps 1, 2, 4, 5 and 9 are not located in an obvious gap between settlements and therefore it is difficult to see how the creation of such designations could be justified.

Ultimately it will be for the Examiner to determine if there is sufficient evidence to justify designation, however the Council would suggest that those Green Gaps that do not have an obvious role in preventing coalescence should be removed at this stage.

SG comment: The SG has carefully reviewed the green gaps. Additional evidence has been provided as to how the green gaps were identified and the justification for each.

Views (Appendix D)

As with other designations clear criteria and justification for the identification of views will ensure consistency. Within Appendix D you need to explain your methodology: How were the criteria arrived at? Who nominated the views? Who assessed the views? Were there any views that were considered but did not meet the criteria? See example of Stanton Drew protected views document [here](#) where they use a short table to explain the reasoning behind the criteria. At the moment it is not clear exactly what each criteria involves e.g. would historic significance fall within one of the criteria? Also how do these criteria assess the value of the view to the community if they were taken from a report designed to assess landscape sensitivity? These criteria need to be reviewed.

SG comment: Additional information has been provided in the Appendix to set out how the views were identified.

This includes the running of a photograph competition asking residents to submit their favourite views. At the launch of the WNP, the community were invited to nominate their favourite views and provide reasons as to why they considered them important to safeguard. The initial SG Chair visited each view to take photographs.

In the context of Wadhurst's location, there are a great number of beautiful views within parish, as evidenced in watercolour books of the Parish. This is evidenced in The majority, however, including many of those suggested by the community, are in places that are located in the wider AONB (well out of the development boundaries) and therefore unlikely to be significantly impacted by development.

Those views that are closest to the settlements, or which are within walking distance from the settlements, have been prioritised within the policy.

All views are viewable from publicly accessible locations.

Four criteria were used to assess each view:

- **The view offers an expansive AONB views**
- **The view takes in Bewl Water**
- **The view is of a local heritage asset**
- **The view is from a ridgeline.**

The historic or environmental significance of some of these views elevates their importance and retention above others around the parish. This should be explained clearly. I note you have now used the conservation area appraisals but the landscape character assessment 2022 and the earlier

character assessment in the Local Plan evidence base also considers views and should form part of the evidence base to aid consistency and consideration of views. Also, currently many of the views are centred on the main village, do any of the other areas in the Parish have key views?

Until we have the above information it is very difficult for us to comment on each individual view and whether it meets the threshold. Therefore, we are unable to comment on the individual views at this stage, however, we would be happy to consider this when the information is available, ahead of your Reg. 16 to provide advice and feedback.

SG comment: There is no specific guidance on what a ‘threshold’ might be. Additional information has been provided in the Submission Plan to set out why each selected view is considered locally significant.

Many of the views pass across potential housing sites that have recently been submitted to the Council for consideration in its SHELAA. It is important that the views you have identified have a clear rationale that relates to the quality/importance of the view in the neighbourhood area and that the description of each view relates back to the criteria for designation and states how the view meets the criteria, or not. **For example View 10 just states it is a beautiful view across the High Weald but does not state how it meets the criteria.** Identification of views as a means to constrain housing development is unlikely to be acceptable.

SG comment: Additional information has been provided in the Submission Plan to set out why each selected view is considered locally significant. The policy does not seek to stifle development that may encroach on a particular view, rather that development proposals that would impact one or more of the identified views is designed in a way so as to minimise its negative impact. This could, for instance, require the proposal to consider how view points might be incorporated into the overall design of a proposal, as opposed to simply blocking a view.

A number of views (3, 4a, 4b, 5a and 5b) are not on any recognised public footpath but rather private land, which will be harder to justify.

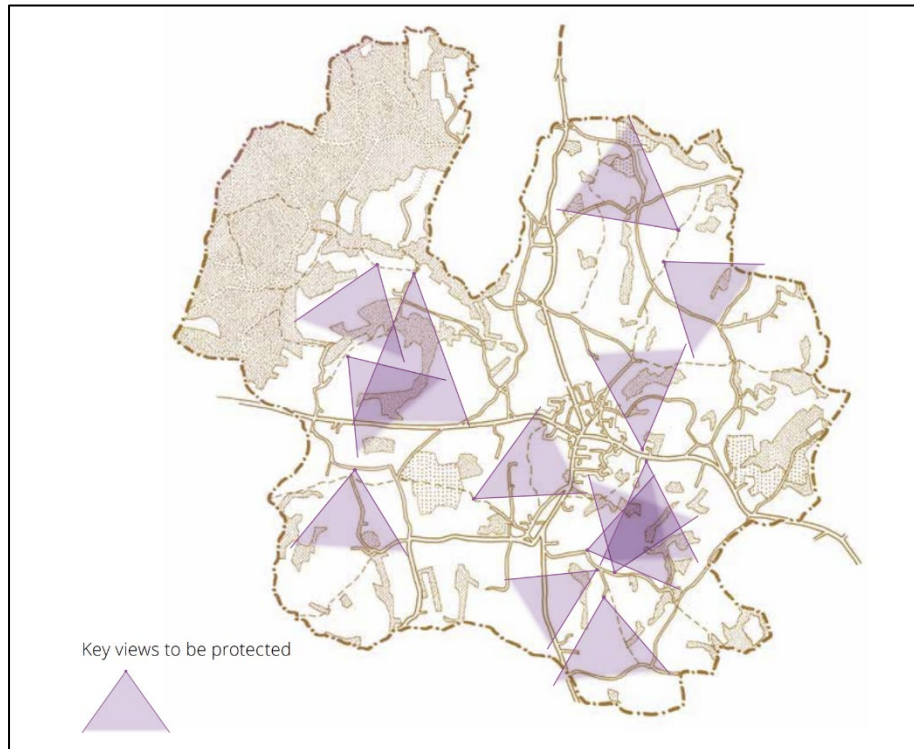
SG comment: Parishioners have been walking this land for over 30 years and there are current footpath claims by local residents. It is only since a development application has been submitted in 2022 by the private owner that restrictions have been enforced.

It is not clear why you have separated out some of the views into different parts. Some of the views are very similar e.g. 2a and 2b or 4a and 4b. It would seem logical to either combine them or if they are clearly different then each one should have a photo and explanation of how it meets the criteria.

The mapping is not very clear for a decision maker – Hawkhurst NDP has a clearer map for example [here](#). Whilst the map showing views cannot be expected to be accurate in showing the full extent of the views visible, the plans you have provided underestimate the scope. Also, some of the photos in Appendix D could be larger so that the view can be fully appreciated.

SG comment: In some locations, there are clusters of views that have been identified and these are noted in the policy.

The mapping provided in the Hawkhurst Plan is not considered to be very clear (see below):



It is not prepared using an OS base map (as required by the legislation), the view locations are difficult to identify and the breadth and distance of individual views are not captured.

Local Green Spaces (Appendix E)

The Council supports the principle of Local Green Spaces (LGS). However, the Parish Council will be aware from our previous consultation responses and discussions that the designation of these sites must be based on strict criteria set out in the NPPF paragraphs 101-102. It would be useful in Appendix E to have an explanation of each criteria as you had in a previous draft. Designating LGS should complement investment in sufficient homes, jobs and other essential services and be capable of enduring beyond the end of the plan period.

When justifying LGS designations the neighbourhood plan should set out clear criteria based upon the NPPF definitions and apply these consistently across the Parish. The criteria set out at Appendix E has still not been applied consistently. For example, all but one LGS has been assessed as having richness of wildlife despite not being designated as Local Wildlife Sites or other similar recognised designation. LG16 has been identified for its historic significance due to having a historic footpath, which would be true of many other fields in Wadhurst. The previous criteria for assessing historic significance (within a previous draft) was based on identified heritage designations and provides a more robust measure for assessing historic interest in potential LGS. This criteria should be used for assessing heritage significance. The criteria does not solely need to be confined to designations but would need clear criteria if applied beyond these. Also, on Table E2, one of the criteria is whether the space is an extensive tract of land. You have answered no to each site but some (as identified below) are quite clearly extensive tracts of land e.g. Bewl Water Recreation Area.

It is noted that you have added more detail and justification since the previous draft and related the assessment of each site back to the criteria for designation, however, some of the assessments do not include justification for every criteria shown as green on table E2. For example, for the assessment of Bewl Water only recreation and beauty are mentioned as reasons for being

demonstrably special but Table E2 refers to beauty, recreation, tranquillity and wildlife. The assessments and Table E2 should correlate.

It is the District Council's view that there are still five designations that do not meet the strict criteria. The reasons for these are set out in the Table below:

Site	WDC Feedback
Ex Wadhurst Playing Field LG7	The designation appears to be selected on the basis of its recreational value but as a former playing field it no longer serves a recreational purpose for the local community. The site does not appear to meet any of the other NPPF criteria; it is not a recognised/designated local wildlife site and does not appear to have a particularly important landscape function or contribute to Wadhurst's identity or character, it's located on the periphery of the main settlement and close to a busy road that might impact its tranquillity.
Turner's Green LG11 / LG12	The designation of this site is being justified on the grounds of historic significance as the last bare knuckle boxing match is said to have taken place there. There are no listed buildings, archaeological priority areas or conservation areas within the site or close by. The site also has a recent planning history. The LGS should only be used to protect small pieces of land particularly valued by the community and are not a tool to prevent development more generally.
Bewl Water Recreation Area LG13	<p>The LGS designation is 13 ha which represents an extensive tract of land. It is too big for LGS designation and it is located some distance from any of the settlements in the neighbourhood area. The site is the location of a private tourist business and LGS designations must be consistent with the local planning of sustainable development and complement investment in jobs amongst other matters.</p> <p>Furthermore, Bewl Water constitutes an important infrastructure asset and expansion/upgrading of infrastructure requirements would outweigh any Local Greenspace designation.</p> <p>The distance from Wadhurst village and Cousley Wood is also an issue.</p>
Stone Cross Farm LG16	This site appears to be an agricultural field with a public footpath. It is a potential housing site being promoted recently through the SHELAA and government guidance is clear that LGS needs to be consistent with local planning for sustainable development in the area. LGS should only be used to protect small pieces of land particularly valued by the community. LGS designations should not be used in a way that undermines identifying sufficient land in suitable locations to meet identified development needs.

SG comment: The WNP has been in gestation for over six years and the identification of the proposed local green spaces predates the submission of sites as part of WDC's SHELAA process. Therefore it is incorrect to say that the LGS designation is being "used in a way that undermines identifying sufficient land in suitable locations to meet identified development needs".

Each of the proposed LGSs has been carefully considered against the NPPF criteria.

LG7 - This is the only sustainable recreation site for the new 41 executive homes and 17 apartments at the old Bellerbys college, located opposite (now Wadhurst Place). The field is now mainly used informal recreation including for dog / recreational walking. It has historically been used for a wider range of recreational pursuits including lacrosse.

LG11/12 – The site is considered to be demonstrably special to the local community from a historical perspective, which is one of the NPPF criteria. A number of articles and other evidence is cited in support of this.

LGS13 – The site is approximately 13ha in size. The SG do not consider that this is too large a tract of land to designate as an LGS. The CPRE undertook a review of how communities have utilised the Local Green Space designation in their Neighbourhood Plans ([Local Green Space: a tool for people and nature's wellbeing](#)), which found the following:

"Analysis of this selection of LGSs revealed an average size of 1.8 hectares (ha) and a median size of 0.6ha. Sizes vary greatly across this selection, ranging from as much as 46.5ha to as little as 0.001ha (or 10 m2). This indicates that what constitutes an area of green space that is 'not an extensive tract of land' (see paragraph 102 of the NPPF) has remained relatively open to local interpretation." (page 13)

In a rural parish, and in the context of the whole of the Bewl site being approximately 424 ha in area, the proposed LGS13 at 13ha is not considered to be extensive.

In terms of being close to the community it serves, the proposed space is well used by those living in Wadhurst Parish. The rural nature of the parish means that residents will travel further than, for instance those living in more urban settings, to spaces that are special to them. Additionally, the space is only 2.5 miles from Lamberhurst which, whilst outside the neighbourhood area, represents an important user group for this particular space.

Whilst there is a planning permission relating to the space for camping pitches, this is only temporary and in any case would not necessarily be contrary to the use of a local green space.

LGS16 – The site has been identified by the community as being demonstrably special, particularly for recreational reasons. Since 2011 this field has been used (bar Covid and severe weather) to host the annual Parish Bonfire and Firework display by the Wadhurst Warriors Charity. The slopes are used for tobogganing on snow days. The site offers the first and only distinctive and highly valued views to the southern ridges as you enter Wadhurst from the B2099 (southeast). It is beautiful, tranquil and has a historic, well-used public footpath 27a (Snape 4) running through it, leading to Birchetts Wood and Forestry Commission Snape Wood. This footpath represents the one public access to these ancient woods without having to walk on pavement- less roads or take the car and is the only footpath able to be directly accessed from Wadhurst village High Street. This unique footpath is highly valued by the community and used for walking and bird watching.

The SG has reviewed again the justification for each of the proposed LGSs and added further information where relevant.

Important Community Facilities

As with the other designations you need to provide clear description and justification for the identification of these buildings as important community facilities e.g. is it well used?

SG comment: The SG has added additional detail to set out how the list of important community facilities was generated, in consultation with the local community.

Sustainability Appraisal

Assessment of Options: In the policy options where you have provided an alternative policy option, you could also refer to the NPPF and PPG as well as the adopted development plan. The scores may need to be reconsidered as a result of this.

Table 2.1. - If you are going to use the Topic areas from Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 please can you use the correct wording i.e. there is not 'Roads and Transport' topic area in the Schedule.

Other than these minor points, the SA is comprehensive and the SA Objectives are sound as they are specific to Wadhurst.

SG comment: Noted. Minor amendments have been made to the Sustainability Appraisal to address the comments from WDC.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
1.	Page 1 (Foreword)	<p>'A Neighbourhood Plan is a statutory planning document'</p> <p>The preparation of a Neighbourhood Plan is not statutory but a right which communities can choose to use. It is however part of the statutory development plan for the area.</p>	Rephrase this sentence, with a clear explanation of what a Neighbourhood Plan is.	<p>Amend the first sentence to:</p> <p>"The preparation of a Neighbourhood Plan is not statutory but a right which communities can choose to use. It is however part of the statutory development plan for the area."</p>
2.	Page 1 (Foreword)	<p>'by which local development planning policies are defined, which gives powers to allow local communities to shape new development'.</p> <p>The Plan itself does not give powers</p>	Consider rewording with reference to the 2011 Act or to neighbourhood planning in general.	See above.
3.	Vision	<p>'The Parish economy and its popular High Street will be revitalised by improvements to the roads, traffic control, parking'</p> <p>Many of these are outside the Neighbourhood Plan's control.</p>	Consider rewording	<p>The vision is for the community and can go beyond the scope of what can be influenced through a neighbourhood plan.</p> <p>Retain as is.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
4.	Page 1 (Objective)	<p>'To provide sympathetically designed high quality housing'</p> <p>Are you going to be providing housing or encouraging the provision of? What is meant by sympathetically designed? What is meant by high-quality?</p>	Consider re-phrasing.	Substitute 'provide' to 'influence'.
5.	Page 2	<p>'Following a successful referendum, the policies in the WNP will be used by Wealden District Council to determine planning applications in the Parish'</p> <p>This makes it sound as though the Neighbourhood Plan will be the only policies used.</p>	Need to explain that the Neighbourhood Plan will sit alongside the Local Plan. See government guidance here	<p>Include additional wording:</p> <p>'Following a successful referendum, the policies in the WNP will be used by Wealden District Council – alongside the policies of the adopted Local Plan - to determine planning applications in the Parish'</p>
6.	Page 2	<p>'from 15% (capped at £100 per existing property)'</p> <p>Needs further clarification</p>	from 15% (capped at £100 per existing dwelling in the parish)	<p>Amend to:</p> <p>2from 15% (capped at £100 per existing dwelling in the parish)'</p>
7.	Page 2	<p>'These contributions can be used to deliver projects of local importance'. Projects have to be infrastructure related and required as a result of new development. See news article on our website here and CIL Guidance for Town and Parish Councils - Wealden District Council - Wealden District Council</p>	These contributions can be used to to deliver projects of local importance deliver infrastructure projects that are required as a result of new development.	<p>Amend as suggested:</p> <p>'These contributions can be used to to deliver projects of local importance deliver infrastructure projects that are required as a result of new development.'</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
8.	1.1	<p>'over the period 2016 to 2036'</p> <p>Why these dates and why back to 2016? Consider bringing this date forward and extending to 2039 in line with the new Local Plan. 2016 is almost seven years ago.</p>	Amend the plan period to correspond with the Local Plan.	<p>The start date is often changeable and can be amended. It mirrors the start date for the work on the plan itself, and also acknowledges the development that has taken pace in that period.</p> <p>Agree to extend date to coincide with emerging Local Plan</p>
9.	1.4	<p>'It also sets out how land should be considered, in planning terms locally'</p> <p>The grammar in this sentence makes it quite difficult to read.</p>	Re-phrase.	Remove the commas.
10.	1.4	<p>'and is a material planning consideration in the determination of planning applications'</p> <p>Is it worth here talking about the different degrees of weight attached to a N Plan depending on the stage it is at? See NPPF para 48</p>	and is a material planning consideration in the determination of planning applications.	<p>Amend:</p> <p>'..and is a material planning consideration in the determination of planning applications.'</p>
11.	1.12	<p>'The Direction of Travel Consultation sets out that for housing, there is a housing need target of 1,225 homes per annum to be delivered across the district'.</p> <p>Need to explain that the figure changes each year. The current figure is 1,212 dpa.</p>	Add further explanation.	<p>Noted and add in:</p> <p>The Direction of Travel Consultation sets out that for housing, there is currently a housing need target of 1,225 homes per annum to be delivered across the district. This figure is subject to change.'</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
12.	1.12	<p>'In terms of employment provision, further work is being carried out at the district level to determine what is required'</p> <p>This has been undertaken and can be found on our website at: Economy - Wealden District Council - Wealden District Council</p>	Add further explanation.	Noted and make reference to the document in the text.
13.	2.7	<p>There are many heritage assets within the Parish</p> <p>You could also refer to the Scheduled Monument on the parish boundary.</p>	Consider adding further information.	Agree – add in reference to the Scheduled Monument.
14.	2.7	The Conservation Area for Pell Green and Cousley Wood was also designated in 2017.	Consider adding more detail- Cousley Wood conservation area was first designated in 1995 and was reappraised and extended to include Pell Green in 2017- see conservation area appraisal here	Agree and add in extra detail to this effect.
15.	2.8	<p>'including four Local Wildlife Sites and four Sites of Nature Conservation Interest and Nature Reserves. These include Snape Wood, Birchetts Wood and Bewl Water.</p> <p>There is also a Site of Special Scientific Interest at Bedgebury, which abuts the parish boundary'.</p>	<p>Paragraph needs to be corrected.</p> <p>You need to clarify what you mean by Nature Reserves- there are no Local or National Nature Reserves showing on our mapping system for Wadhurst.</p>	Amend.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		<p>Local wildlife sites were formerly known as SNCIs.</p> <p>Birchetts Wood is not a Local Wildlife site according to our mapping system</p> <p>Bedgebury Forest is not a SSSI and does not adjoin the parish- Eridge Park however is a SSSI and does adjoin the parish- see Screening Report.</p>	You may also want to make reference to the large amount of Ancient Woodland in the parish.	
16.	2.9	<p>‘connections via road and rail to the rest of the UK’</p> <p>Can you expand on this? Perhaps a bit more detail could be given on the railway in the parish.</p>	Consider expanding on this statement	<p>Amend to say:</p> <ul style="list-style-type: none"> - Which roads and the key settlements they serve. - The end stations on the railway lines that passes through Wadhurst.
17.	2.17	Can this be expanded into a SWOT analysis looking at the strengths, weaknesses, opportunities and threats facing the parish? The work you have done would help towards completing the opportunities and threats.	Consider expanding into a SWOT analysis.	This is not essential – in fact the inclusion of opportunities and challenges is not essential but useful for illustrating the storyline of the plan and how the vision and objectives were developed (with the community) to address the opportunities and challenges.
18.	3.3	<p>‘To provide sympathetically designed high quality housing for parishioners’</p> <p>Are you going to be providing housing or encouraging the provision of? What does sympathetically designed mean?</p>	Consider re-phrasing.	The WNP does not allocate sites but it does support housing provision to meet local need (as set out in Policies WAD1 and WAD2). The word ‘provide’ could be substituted for ‘influence provision of’.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
				Sympathetically designed in accordance with the design guidance that has been prepared for Wadhurst ’.
19.	4.6	<p>‘to c. 1,221 dpa (including neighbouring Council needs) for the emerging Local Plan (2023)’.</p> <p>As of 2022 this is 1212 dpa. This figure does not include neighbouring council needs, which would be additional.</p>	to 1,212 dpa (including neighbouring Council needs) for the emerging Local Plan (2023). in 2022.	<p>Amend as suggested:</p> <p>‘..to 1,212 dpa (including neighbouring Council needs) for the emerging Local Plan (2023).in 2022.’</p>
20.	4.6	<p>‘As the percentage of WDC’s annual housing requirement that has been delivered has fallen below 85%, there is a 20% buffer added to this total, thereby effectively increasing the annual requirement to c. 1465 dpa.’</p> <p>This 20% buffer only applies to the 5 year housing land supply and does not relate to the local plan housing requirement. This sentence should be removed.</p>	<p>Remove this sentence entirely as it confuses how housing need is calculated for the Local Plan and how the 5 year housing land supply is calculated.</p> <p>As the percentage of WDC’s annual housing requirement that has been delivered has fallen below 85%, there is a 20% buffer added to this total, thereby effectively increasing the annual requirement to c. 1465 dpa.</p>	Amend as suggested.
21.	4.7	This paragraph refers to the Council’s 5YHLS position and refers to the state of play as of 1 st April 2021. This will of course change shortly and on an ongoing basis I am not sure this paragraph is needed, or it could be simplified to just confirm that	Suggest either its removal or simplification.	Amend to simplify.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		Council does not have 5YHLS position. The paragraph will become outdated very quickly as the position is updated regularly.		
22.	4.8	<p>'since late 2015, official data shows that WDC has not been meeting its Government Housing Need and WDC (and Developers) deem this an 'exceptional circumstance' for major development on AONB Greenfield, thereby tilting the balance in favour of development'</p> <p>This is conjecture, the AONB still has a national landscape designation and decisions are made on a case by case basis and in accordance with national policy.</p>	Re-phrase.	Amend.
23.	4.9	<p>'from 2016/22 there have been 230 completions, approvals and live applications (as of 3rd August 2022)'</p> <p>Do you mean between 2016- 2022, in Wadhurst? What is the source for this?</p>	Needs clarification.	Clarified in document.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
24.	4.13	<p>‘urges WDC to consider Parishioners’ preferences for future development to use Brownfield sites in preference to the Greenfield Countryside, before making their strategic development site allocations for the emerging Local Plan (2023) and their subsequent further planning application approvals’.</p> <p>When allocating sites in the Local Plan a whole range of factors are taken into account, including whether it is brownfield land as per the NPPF, but given the housing requirements for the district, the lack of industrial legacy and the fact that we need to retain many of our employment uses, this means that brownfield land opportunities are rare therefore we have to consider greenfield land for housing and employment development.</p>	Consider re-wording.	Reword for clarity.
25.	Figure 4.1	Map showing the development boundaries	<p>Map showing the current development boundaries.</p> <p>Is this map needed? See point below</p>	Amend: ‘Map showing the current development boundaries.’

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
26.	POLICY WAD 1: LOCATION OF DEVELOPMENT A	<p>‘Development in the neighbourhood plan area will be supported within the development boundaries as defined in Figure 4.1.’</p> <p>Please note that the draft local plan will be reviewing the development boundaries and where required updating them.</p> <p>Are you supporting any/all development within the development boundaries?</p>	<p>within the development boundaries as defined in the 1998 Local Plan or subsequent adopted Local Plan.</p> <p>This part of the policy needs to be more precise, what development are you supporting within the development boundaries? An option would be to add wording such as ‘where this is in accordance with other policies and proposals in the adopted Local Plan and Neighbourhood Plan’.</p>	<p>It is true to say that the development boundaries may be amended in the review of the Local Plan. Amend the wording to make this clear – amend the policy to include the text in bold and ‘where this is in accordance with other policies and proposals in the adopted Local Plan and Neighbourhood Plan’.</p>
27.	POLICY WAD 1: LOCATION OF DEVELOPMENT A	<p>‘Development proposals on brownfield land will be particularly supported’</p> <p>You need to clarify, development on brownfield land where? Inside and outside the development boundary?</p>	<p>Support will be given to development proposals on brownfield land will be particularly supported.</p> <p>Clarification is needed</p>	<p>Retain the phrasing as is, as it is particularly supporting development on brownfield, as opposed to the suggested amendment.</p> <p>Caveat by ‘within the development boundary’ or anywhere (clearly if outside the SB, then this would be subject to AONB criteria).</p>
28.	B	<p>‘Development in the countryside...will be resisted... except in the exceptional circumstances detailed below’:</p> <p>What do you mean by development, does this include all development? As it reads the policy would appear to prevent all development, including even residential extensions or potentially other development that may ordinarily be</p>	<p>This part of the policy needs to be reviewed. Anything that you list that isn’t in the NPPF will need to be justified.</p>	<p>Amend to ‘major development’.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		<p>accepted in the countryside. This is contrary to policies DC19 and DC20.</p> <p>This also contradicts the NPPF para 80 which states that there are circumstances in which homes in the countryside may be permitted and paragraphs 84 and 85 which support rural businesses. Should there also be a reference in the policy to Para 177 of the NPPF bearing in mind the Parish is within the AONB? Or at least reference to a landscape policy in the plan if this covers this?</p>		
29.	i	<p>Some of the terminology here is unnecessary:</p> <p>B(i) – Should simply refer to conserving and enhancing the AONB, significantly and demonstrably not necessary. Reference to demonstrating positive contribution to AONB objectives is too high a bar too – should be ‘have regard to’.</p>	Reword	<p>Amend: ‘Significantly and demonstrably Conserves and enhances the landscape and scenic beauty of the High Weald Area of Outstanding Natural Beauty and its setting and demonstrate a positive contribution to the has regard to the objectives of the High Weald AONB Management Plan;’</p>
30.	ii	<p>‘the proposal is necessary to meet a demonstrable agricultural or forestry need or needs of other activities which require a rural location, in accordance with national planning practice guidance’;</p> <p>Which part of the PPG are you referring to here? Demonstrable agricultural need</p>	Consider rewording	Retain.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		is also too high a bar. Rural enterprise is to be supported and the relevant test is whether it is 'reasonably necessary'.		
31.	iv	This point refers to social housing, but in reality the term to be used here is 'affordable'. Rural exceptions sites can include all forms of affordable housing (social rented, first homes, shared ownership etc.)	Reword	Amend to replace social housing with affordable housing.
32.	C	Somewhere in this part you need to clearly set out what development will be supported within these green gaps e.g. development within the Green Gaps as shown in Figure... will be supported where it..../ or where it does not....	Amend the wording to make it clear what will be supported within the Green Gaps and what will not.	
33.		SEE SEPARATE DETAILED COMMENTS ON GREEN GAPS.		See p. 3-6.
34.	5.9	Table	Justification required. You need to be able to justify any mix that deviates from the mix in the Wealden LHNA. Justification could take the form of your own Housing Needs Assessment and would need to be robust. Our district wide assessment did not find a justification to have a different housing mix but welcome any	The table is an indicative mix based on delivery to date in the parish and the current. It is not explicitly carried into the policy as it has not been developed via an official Local Housing Needs Assessment.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
			new local housing needs assessment to prove otherwise.	
35.	POLICY WAD 2: HOUSING Part A	<p>' will be supported, and in accordance with Policy WAD3 in this N Plan'</p> <p>This phrasing does not make sense.</p> <p>No issue with first part if justified, but query whether the second part – about truly affordable housing – can work.</p> <p>Firstly, how would we test 'truly affordable'?</p>	Re-phrase this sentence and remove the term 'truly affordable'	<p>Amend as follows:</p> <p>Proposals that will deliver smaller two- and three-bedroom dwellings to address the needs of single people, young couples, smaller families and the elderly will be supported, and in accordance with Policy WAD3 (Design and character of development) in this Neighbourhood Plan. Subject to the other policies of this plan, proposals that deliver truly affordable housing in nominal terms (i.e., those that are affordable for local people on local wages) will be supported.</p> <p>Noted.</p> <p>Agree and the SG is aware of this.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		Secondly, affordable housing should be provided in accordance with set criteria – either the district policy or a variation of this if local evidence dictates otherwise. How can we support a scheme for ‘truly affordable units’ if a separate affordable policy requires a different mix?		Agree – the amendment above would address this.
36.	Part B	<p>Developers are required to submit a neighbourhood area specific ‘Affordable Housing and Dwellings Mix Strategy’.</p> <p>It is outside the remit of a neighbourhood plan to dictate the documents that are required to accompany a planning application.</p> <p>The council has a validation list and if further details are required the validation team will request them or the planning officer will via condition or S106 agreement.</p>	<p>See the comments on the table above.</p> <p>Remove the requirement for an Affordable Housing and Dwellings Mix Strategy.</p>	<p>The table above is purely indicative.</p> <p>Rephrase:</p> <p>“Housing development must contribute to meeting the existing and future housing needs of the Parish. Developers are required to submit a neighbourhood area specific ‘Affordable Housing and Dwellings Mix Strategy’ with any planning applications for major development. The Strategy must clearly set out identified housing needs within the neighbourhood area and demonstrate how the proposed development addresses those needs” to</p> <p>“Other than in development designed to meet an identified specialist housing need, the mix of housing sizes, types, tenures, and affordability in proposed development should, in so far as is</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
				<p>reasonably practicable and subject to viability, assist in meeting needs identified in the most recently available Local Housing Needs Assessment.”</p> <p>The group could commission one for the local level.</p>
37.	Part C	<p>‘and should meet the specific needs of the neighbourhood area’.</p> <p>What is meant by this?</p>	This needs further explanation.	Delete this last phrase as it is covered in Part A.
38.	Part C	<p>Tenures of affordable housing should be explained in the text above, when cited in the policy. At the moment our local plan policy states 20% intermediate, 40% social rented and 40% affordable rented. I assume you are removing the intermediate element for the adopted policy for 'first homes', but again, this is not clear here.</p> <p>The tenures are explained in the glossary, so you could refer to this.</p>		<p>Amend to remove the words ‘tenure of’.</p> <p>Make reference in supporting text to the glossary definition (which mirrors the NPPF) of affordable housing.</p>
39.	Supporting text for policy WAD 2	Within the supporting text you need to explain what First Homes are.		<p>Noted – add an explanation / refer to Glossary definition.</p> <p>The introduction of First Homes presents an opportunity for local authorities to require higher discounts on these affordable homes (intermediate housing)</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
				for sale, where the need can be evidenced locally.
40.	6.5	'It focusses policies on three core considerations: respecting the setting of the High Weald, incorporating sympathetic placemaking principles next; encouraging detail design built in towards the end'.	It focusses policies on three core considerations which help to structure the design process: first, respecting the setting of the High Weald, incorporating sympathetic placemaking principles next; encouraging and detailed design built in towards the end'	Amend as suggested.
41.	6. Character, Heritage, and Design	Also includes sustainability – I wonder if it is worth separating out 'Character and Design', 'Heritage' and 'Sustainability'?		Agreed – amend the title to explicitly mention sustainability.
42.	6.14	'Wadhurst high Street conservation area' The formal name of the designated area is Wadhurst Conservation Area. Also mention Pell Green and Cousley Wood Conservation Area?	The Wadhurst high Street Conservation Area also extends down into the Lower High Street neighbourhood.	Amend.
43.	POLICY WAD3:DESIGN PART A	This policy is currently over 3 pages long. We suggest that this should be shortened. Consider the text that is policy and text that could be supporting text to the policy. This also applies to B.	This policy needs to be considerably reduced in length to be easy to use by applicants and Planning Officers.	Noted – suggest the policy is reduced making reference to the Design Code, which is an integral part of the plan. Any duplication to be removed. Noted – amend.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		<p>Still refers to 'must' – it would be better to say that applicants will be expected to demonstrate how.... valued views into and out of the settlements'</p> <p>You have a separate policy regarding valued views.</p> <p>'This will help to avoid generic building design that is inappropriate to the Plan area'.</p> <p>'Preference should be given to utilising naturally renewable materials, reusing materials, and locally produced materials with reduced embodied energy from transport and avoiding materials known to have a detrimental environmental effect in manufacture, use or disposal'.</p>	<p>valued views into and out of the settlements</p> <p>Consider moving to the supporting text as it is explaining why you have the policy.</p> <p>Consider moving to the sustainable design policy</p>	<p>Agree – amend as suggested.</p> <p>Agree, this is more appropriate in the supporting text as opposed to within the policy.</p> <p>Agree – check against current policy content for WAD4 and move.</p>
44.	PART B	<p>'by protecting and enhancing the quality, distinctiveness and character of settlements and minimising the impact on the natural environment'</p> <p>Much of this is already covered in part a of the policy.</p> <p>The rest of part B is very long and prescriptive. Seems to be repeating text from various design guidance, which isn't necessary, as the guidance can cover this.</p>	Remove duplication and shorten part b.	Noted – see comment above.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
45.	Design guidance conformance	You need to state what you want proposals to do i.e. proposals shall take account of or proposals shall conform with...		Add 'proposals shall conform with...' to the start of i. and ii.
46.	Site context	There is some repetition between the different points here. iii. Should this also talk to landscape assessments if character of the area is mentioned. This includes the latest Landscape Character Assessment. Also, Landscape sensitivity assessments will be published by WDC shortly that will include Wadhurst? Is the design code based on the most up-to-date landscape evidence?	The site context list could be considerably refined.	Commentary from Design Guidance authors provided in Consultation Statement
47.	Site context	'vi. development should not detract from the unlit environment of the Parish. Glazing and outside lighting should be designed to minimise light spill, in accordance with Policy WAD17 (Protection of Dark Skies)'.	Repetition. Consider removing as it is already covered in policy WAD17	Agree this could be removed.
48.	Site context	'vii. ensuring development of and in proximity to designated and local heritage assets and their settings conserves, preserves, reflects and enhances the historic asset and the historic environment in accordance with their significance';	Repetition with Policy WAD5. Consider removing.	Remove.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		<p>Reference to local heritage assets is unclear. does this refer to non-designated heritage assets or other local heritage assets? Terminology should ideally be consistent with national policy 'historic asset' = heritage asset?</p> <p>Also repetition with iv – could deal with heritage and setting together.</p>		
49.	Site context	Viii – There may be situations where a higher density may be suitable, such as close to the village centre where accessibility is good for example or to facilitate different types of housing. On this basis the policy could remove the density reference and instead talk to new housing not detracting from character etc.		Retain
50.	Residential Amenity	<p>'that the built form does not create an unacceptable loss of privacy and overbearing impact, outlook, or daylight and sunlight enjoyed by the occupiers of adjacent/nearby properties, in accordance with the National Design Code'</p> <p>At the moment this part of the policy states that there should not be a loss of overbearing impact which does not make sense.</p>	<p>that the built form does not create an unacceptable loss of privacy and overbearing impact, outlook, or daylight and sunlight enjoyed by the occupiers of adjacent/nearby properties, in accordance with the National Design Code</p>	Amend as suggested.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
51.	Local Character, roofs and fenestration	A lot of this text is simply repeating the design code.	Consider removing and instead provide a simple reference to a need to comply with the design code for guidance on materials, architectural details, fenestration	Agree.
52.	PART C	<p>Development near open countryside</p> <p>The text here sounds confusing and not sure it's necessary.</p> <p>It's not referring to development outside of development boundaries. So, if it's development within development boundaries is it necessary? Transition to countryside is part of rural character.</p> <p>Or, if it is edge of settlement – so outside of development boundary – is that not a contradiction with no development in countryside policy?</p> <p>There might be cases where a denser development is needed, particularly when it's the AONB and to ensure the efficiency of land. The most important aspect is softening an urban edge in landscape terms therefore the first sentence is all that is needed on the basis that if</p>		<p>The WNP does not restrict all development in the countryside: WAD1 seeks to focus development within the development boundaries, but development can take place outside in certain circumstances.</p> <p>This clause seeks to ensure that any development that takes place on the edge of an existing settlement (either within the DB or adjoining it) should be lower density so as to ensure that impact on landscape character is reduced.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		landscape / edge impacts is mitigated then density is not a factor.		
53.	POLICY WAD4: SUSTAINABLE DESIGN PART A	<p>‘Proposals which incorporate design, materials selection and environmental performance measures and standards to reduce energy consumption’</p> <p>What does this actually mean? Suggest redrafting this to ensure that the policy is clear and concise and can be understood by developers and planning officers in relation to what you are seeking to achieve. Is this sustainable design and construction – the energy hierarchy?</p> <p>Is there a need to talk to landscape again as this is covered by other policies and the plan policies will be read as a whole?</p> <p>‘iv. Incorporating on-site energy generation from renewable sources such</p>	<p>Ground source heating heat pumps.</p> <p>Needs further explanation</p>	<p>Amend to:</p> <p>‘Preference should be given to utilising naturally renewable materials, reusing materials, and locally produced materials with reduced embodied energy from transport and avoiding materials known to have a detrimental environmental effect in manufacture, use or disposal’.</p> <p>Could remove the words: ‘ where measures will not have a detrimental impact on character, landscape and views’ from Clause A.</p> <p>Examples are provided – e.g. solar, ground source heating etc. Amend to heat pumps as suggested.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		<p>as solar panels, ground source heating and energy generation etc’.</p> <p>What do you mean by energy generation etc?</p>		
54.		<p>‘Maintaining the character and appearance of historic vernacular buildings....’</p> <p>Pleased to see this incorporated, however, it is not only about the character and appearance but also about the performance of traditional construction methods, which act in a very different way to modern materials and construction and therefore are not compatible with all retrofitting measures. Any proposals for upgrades to traditionally constructed properties need to be based on a sound understanding of the building fabric and construction performance. Worth noting that Part L of the Building Regs and EPC incorporate allowances/exemptions for traditional construction and heritage assets.</p>	Reword.	Move into the supporting text.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
55.	PART B	The wording of this is confusing.	Needs clarification and reworking so that the sentence can be easily read / understood.	SG think this does make sense and is in fact based on Examiner recommendation from elsewhere when considering 'retrofitting'. It's also been approved text in other areas by Historic England.
56.	PART C	<p>'Major infrastructure developments will be resisted'.</p> <p>Test for infrastructure can't be different to any other development. Need to have regard to conserving and enhancing and only major in the context of the AONB can be dismissed out of hand unless in the public interest.</p> <p>What is actually meant by major here, does it relate to the High Weald AONB test or something else?</p> <p>If it is major development within the AONB (according to NPPF para 177), would the NPPF not suffice alongside other landscape policies?</p> <p>Also this policy looks to sustainability and design – C looks to resist solar and windfarm development. Could landscape impact of infrastructure therefore be dealt with in a landscape policy?</p>	Remove C.	SG discussed and wish to retain as is.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
57.	6.25	Would benefit from an explanation of what a Conservation Area is.	Add explanation	This is defined in the Glossary.
58.	6.26-6.29	Could these paragraphs be moved to the introduction where you talk about history? This would limit the supporting text to the justification for the actual policy.	Consider moving these paragraphs	Amended
59.	Supporting text	<p>Within the supporting text you need to explain the difference between designated heritage assets (Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Conservation Areas, World Heritage sites, Protected wrecks, Registered battlefields) and non-designated heritage assets (buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets).</p> <p>Worth noting that there are <i>presently</i> 154 individual/groups of buildings – this number may change over the plan period as new buildings are designated.</p>	Further explanation needed.	<p>Noted. Add definition to para 6.30/6.31.</p> <p>Add word ‘presently’ re number of listed assets.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
60.	6.31	<p>'The Historic Environment Record contains details of heritage assets, some of which are not nationally listed. The record should be consulted by prospective developers and the non-listed entries on this record should be considered non-designated heritage assets and therefore be subject to Policy WAD5'.</p> <p>Consider whether to create 'criteria' for what may be considered a NDHA in the plan area. Historic England have produced guidance which sets out some commonly used criteria here. If considering identifying NDHA, you would need to create robust selection criteria for assessing assets for heritage value and carry out a detailed assessment process.</p> <p>The HER does not identify NDHA – see paragraphs 60-62 of Historic England's guidance which explains the role of HERs in relation to local heritage lists. It should be used for informing considerations of heritage value, and might provide a starting point for identifying criteria or the basis of a list (e.g. by identifying concentrations of certain building types relating to local history), but cannot be used in the way suggested (see pages 13-</p>	This paragraph needs to be re-written.	SG has developed criteria based on Historic England guidance – included in the Appendix and used to justify the NDHAs noted.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		<p>14 of the guidance). The record contains information on a wide range of information from archaeological finds through to historic buildings, but not everything that is un- listed will be a non-designated heritage asset, and critically, things that are not on the HER can still be considered NDHA.</p> <p>The heritage gateway which you provide a footnote to, is incomplete and forms part of the identification process not the only part of the process. The HER and Heritage Gateway are not the same thing- see the E Sussex website here</p> <p>Even if you don't want to produce a local list you can still form a policy with criteria as to what you would consider a non-designated heritage asset to be</p>		
61.	6.33	<p>'it is proposed that the community consider if there are any other historic assets that are neither nationally listed, nor appear in the Historic Environment Record, which might be suitable for Local Listing with Wealden District Council'.</p> <p>It is not clear from this why you are seeking nominations. Is it so that you can form your own local list, if so, you would need to do this as part of the</p>	Needs clarification.	See above

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		<p>neighbourhood plan process (see previous comments), or so that you can forward nominations to Wealden for as and when Wealden prepare a local list?</p> <p>As above, even if you don't want to produce a local list you can still form a policy with criteria as to what you would consider a non-designated heritage asset to be.</p>		
62.	6.32	<p>Historic routeways-'Many still exist today in Wadhurst and these should be recognised as non-designated heritage assets in the planning process'.</p> <p>Routeways have cultural significance and certainly form part of the historic environment. HE does have an 'Introduction to Heritage Assets' guide on pre-industrial roads and trackways here but seems to refer to quite specific features.</p> <p>This appears to just copy the High Weald AONB, including their map - is it necessary? The AONB have a very detailed guide on the ways these routes add to cultural heritage. What additional background can you add specific to the parish? What is specific about their contribution to the historic environment?</p>	This is too general a statement	<p>The AONB Unit expressly asked for their maps to be included and for the policy to extend protection to the routeways for their heritage value, particularly in light of the fact that the AONB Management Plan is not a statutory part of the Development Plan.</p> <p>Retain.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		What threats are they under in the local areas? If retaining this, it should be more specific to the parish and its historic environment generally.		
63.	6.34 and 6.35	<p>These paragraphs need clarification, who are you suggesting carries out the audit? Who are you suggesting take opportunities to restore assets?</p> <p>For grade I and II* listed buildings Scheduled Monuments and Conservation Areas, the auditing is done by the LPA with Historic England on a rolling basis, and is monitored/published annually by HE.</p> <p>You could identify what you might consider to be risk factors for grade II or NDHA. E.g. Is there an issue with redundancy for certain building types in the area? (Barns, oasts, etc) or some other local factor (loss of certain industries) which are making certain building types more prone to redundancy? The policies could then set out that proposals which would address the risks could be given careful consideration in the planning process</p>	Needs clarification	<p>The Parish Council, working in conjunction with Historic England, the WDC Conservation Team and local organisations, will agree lists of key local assets and unprotected buildings that are valued locally and which may be under threat and identify proposals and funding to rescue them.</p> <p>For assets outside the Conservation Area, HE only records Grade I and II* outside London. The majority of listed assets in Wadhurst fall outside this scope.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
64.	POLICY WAD5: HERITAGE ASSETS	'Historic heritage assets' Contains duplication	Historic heritage assets	Amend.
65.	PART A	'Assets contained in the Heritage Environment Record...including those which are not already nationally listed'	The whole of part A needs re-wording.	See notes above. Add criteria (HE) against which assets should be considered.
66.	PART A	As I explained above the Historic Environment Record and heritage gateway are not the same thing. Also one cannot simply state that anything that is not a Listed Building is automatically a heritage asset.		<p>The WNP is not stating that 'anything that is not a Listed Building is automatically a heritage asset.' Rather it is pointing to the East Sussex HER as the list of heritage assets that have been identified by HE in partnership with the County Council.</p> <p>The East Sussex HER holds information dating from the Palaeolithic period (c.800,000 years ago) up to 20th Century monuments. There are a range of sites, from those well-known such as Lewes Castle and Battle Abbey, to sites only known from aerial photographs and lidar analysis.</p> <p>The information is used:</p> <ul style="list-style-type: none"> to provide advice in many aspects of the planning process and help manage the county's heritage in a sustainable way

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
				<ul style="list-style-type: none"> as a valuable research tool, used by students, local archaeologists, historians and members of the public
67.	PART A	<p>Boxing fields- can have cultural significance but doesn't necessarily make it a heritage asset.</p> <p>Where area designations relate to either battlefields, parks, gardens, etc. it is the specific interaction of location/topography, man-made manipulation and/or archaeological potential that marks their significance,</p>	Remove from list of heritage assets	<p>Retain as a NDHA as this has historic value. The SG has provided a significant amount of evidence as to the historic significance of the site at the local level.</p> <p>Set out the justification of the site against the HE criteria and include this in Appendix E (which should be renamed to include both LGS and NDHA details).</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		and supplements the historic interest, which also generally needs to have had a wider societal impact. The event certainly has some historic interest, but it is not clear how this specifically relates to the characteristics of the site (both LG11 and LG12) or <i>what</i> would be considered the NDHA? What significance does the site itself have?		
68.	PART C	<p>‘Where a scheme has a potential impact on archaeological remains (below or above ground) a Heritage Statement should be prepared in support of planning applications’.</p> <p>It is outside the remit of a neighbourhood plan to dictate the documents that are required to accompany a planning application. The council has a validation list which sets out when a heritage statement is required (and it is not just on sites of archaeological interest). The validation team will request this when it is required.</p>	Remove the requirement for a heritage statement	Noted. This should be removed.
69.	PART D	<p>‘A proactive stance will be taken to any heritage assets that may be at risk’</p> <p>This needs explaining – what is meant by a proactive stance?</p>		A proactive stance - as opposed to a reactive one - involves acting in advance of a future situation rather than simply responding to a situation that has already happened . This refers to the supporting text, which sets out the PC, in partnership with HE and others will

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		<p>'Great weight will be given to the desirability of conserving designated heritage assets'.</p> <p>This should be incorporated into Part A.</p>		proactively monitor heritage and work with owners, where possible, to explore ways to restore heritage that may be at risk.
70.	6.36	<p>'three Conservation Areas'</p> <p>There are only two Conservation Areas in Wadhurst- Pell Green and Cousley Wood are treated as one.</p>	three two Conservation Areas'	Amend.
71.	POLICY WAD 6: CONSERVATION AREAS	<p>'and sites adjacent to, or with views from and into these areas'</p> <p>This is covered by the next line when you refer to settings</p> <p>Unclear what local context this is adding to NPPF and the Local Plan policies? Is it necessary to specifically have a policy for CAs when you have a more general policy on Heritage Assets? A conservation area is a designated heritage asset, so perhaps duplication (note that there is no separate policy for listed buildings which are also designated heritage assets?)</p>	and sites adjacent to, or with views from and into these areas	SG discussed and wish to retain.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
72.	POLICY WAD 7: SAFE AND SUSTAINABLE MOVEMENT A	'the schools'	the schools education	Amend.
73.	C	<p>'Materials and layout must be sympathetic to local character'</p> <p>Not sure this works – highway works aren't typically sympathetic.</p> <p>If the issue is about the impacts of new development, this is suitably covered by existing design and AONB policies.</p> <p>If it's about standalone highway works – we have no control. That's Permitted Development and is a ESCC matter.</p> <p>Perhaps a rewording to say necessary highway works should include suitable mitigation where possible?</p> <p>This could have some qualification here for Conservation Areas see https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all/highway-engineers-and-designers/</p>		Make reference to the CA guidance as per the suggestion. Otherwise retain text.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
74.	7.16	<p>'Therefore a Transport Assessment is required for major development and a Transport Statement for smaller sites'</p> <p>As our validation criteria explains here there are three different types of transport report that may be required depending on the size of the development and as laid out in the East Sussex guidance here.</p> <p>It is outside the remit of a neighbourhood plan to dictate the documents that are required to accompany a planning application. It is for our validation team/ the planning officer to determine what level of report is required to accompany an application, based on the ESCC guidance.</p>	Remove the requirement for a Transport Assessment/Statement	See comments from Highways.
75.	POLICY WAD8: MITIGATING TRAFFIC	<p>We can accept C of this proposal. However, A and B is outside of the remit of a neighbourhood plan. However, it is noted that this is along the lines of 'strongly supported'.</p> <p>See comment on line above.</p>	Remove the requirement for a Transport Assessment/Statement.	SG discussed and text relating to the key junctions should be retained.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
76.	POLICY WAD9: CAR PARKING PROVISION D	<p>'development proposals should provide an adequate amount of sensitively designed off-street parking' 'which complies with the East Sussex County Council's Parking Guidelines'.</p> <p>How is adequate determined? Should the ESCC parking Guidelines just be relied on to determine what 'adequate' is?</p>	<p>which complies with in accordance with the East Sussex County Council's Parking Guidelines'</p> <p>You need to make reference to the guidance for parking at new residential development document and the guidance for parking at non- residential development documents here.</p>	<p>Amend:</p> <p>'development proposals should provide an adequate amount of sensitively designed off-street parking' 'which complies in accordance with the East Sussex County Council's Parking Guidelines'.</p>
77.	F	'Space should be provided for dedicated cycle parking and/or storage'.	Again you could make reference to the two ESCC documents.	Include reference to the ESCC guidance. Documents.
78.	G	'Electric vehicle charging facilities that are affordable, reliable and open access must be provided as appropriate to their scale'.	Again you could make reference to the two ESCC documents.	Include reference to the ESCC guidance. Documents.
79.	8.3	The evidence base for Wealden has been updated. There is now a 2022 Town Centre Study and a 2022 Employment and Economic Study. See our website here .	Update paragraph with reference to most up to date evidence.	Amend as recommended.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
80.	8.5	'the new permitted planning development right (Class MA),'	the new permitted planning development right (Class MA),	Amend.
81.	POLICY WAD:10 EMPLOYMENT RETENTION A	<p>'Within the development boundaries, proposals for new commercial activity (use E) and/or the expansion of existing commercial activity'</p> <p>The term commercial needs clarification. Do you mean just retail or any use within class E which includes commercial, business and service?</p>	This needs clarification. Use class E is quite broad. See planning portal here .	<p>Potentially amend the title of the policy to relate to Village Centre employment.</p> <p>Suggest E(a and b) and F.</p>
82.	B	<p>'(uses B2, B8, E and F) will be particularly supported'</p> <p>Where are you supporting these uses? Some of these uses e.g. B2, B8 would not usually be appropriate in residential areas or the High Street.</p>	This part needs to be refined. Also if you are supporting proposals in a certain area these need to be defined on a map.	<p>Within the development boundaries.</p> <p>E (a and b) and F.</p>
83.	C	<p>For information it is likely that we will be proposing 18 months of evidence in the emerging Local Plan. You could therefore raise this from 12 months to 18 months if you wanted to?</p> <p>'Proposals for a change of use of existing commercial premises'.</p>		<p>Noted and agree to amend to 18 months to align to the emerging Local Plan.</p> <p>E (a and b) – group to discuss if other uses within E to be included.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		Can these be defined in terms of the use class order to be specific on this?		
84.	D	<p>'Change of use....will not be supported in the High Street'</p> <p>Presumably, given the second sentence of this policy this only applies to the ground floor level.</p>	Change of use....will not be supported in the High Street at Ground Floor level	Amend as suggested.
85.	D	'Proposals for residential developments above shops will only be supported if off-road parking and off-street bin provision is incorporated'.	Proposals for residential developments above shops will only be supported if off-road parking and off-street bin provision is incorporated and subject to impact on residential amenity.	Amend as suggested.
86.	POLICY WAD11: TOURISM i	<p>'The proposal must involve the redevelopment or diversification of an existing building, within its existing Use Class'.</p> <p>This does not currently make sense and is too restrictive, for example it would prevent the conversion of any farm building to a use other than agriculture.</p>	This part needs to be re-written.	Remove the words 'within its existing Use Class' or set out a list of the uses that you would be prepared to consider (e.g. F).

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
87.	ii	It would be useful if you could explain sustainable tourism within the supporting text. The link you have provided does not explain the concept.		Noted. Agree to include a definition in the support text – likely to be an excerpt from the linked document (para 1.3 and para 1.4).
88.	iii	Is this needed again. It is set out in the design policy? The plan will be read as a whole.		Delete. Policies are read collectively, so there is no need to repeat clauses from other policies.
89.	iv	‘There are demonstrable economic and social benefits to the proposals’ How would this be defined?	This should be deleted. If rural tourism is supported, subject to the other criteria, why would you need to prove its benefits?	Agree – para 1.4 of the tourism document, which will be placed in the supporting text, would set out the definition of rural tourism and its benefits.
90.	v	‘no significant detrimental impact’	Again, you need to give examples, what kind of impacts?	Amend to: ‘The proposal would not generate any unacceptable impact on the amenity of residential properties and on the capacity and safety of the local highways network.’
91.	POLICY WAD12: COMMUNICATION A	‘Major development proposals should require the installation of fibre optic connection services to all the properties on site and preferably multiple properties access’.	Either within the policy or supporting text explain what multiple properties access is.	Add detail to the supporting text.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		What does multiple properties access mean?		
92.	A	<p>‘Preference should be given to technologies that have little or no visual impact on the landscape, such as subterranean fibre optic cabling’</p> <p>There could be considerable heritage impact associated with this (as well as biodiversity) – needs to balance the specific sensitivities.</p>	Consider re-wording: Preference should be given to technologies that have little or no visual impact on the landscape, such as subterranean fibre optic cabling, unless other material considerations apply.	Amend.
93.	9.10	There are other BOAs within Wadhurst Parish which you could refer to here.		This is correct. Include an additional sentence to say that in addition to BOAs that have been identified e.g. by ESCC, WDC and others – perhaps with a link to the relevant GI document – the following additional opportunities have been identified by the community.
94.	<p>POLICY WAD13: CONSERVATION AND BIODIVERSITY</p> <p>A</p>	<p>‘Proposals for all new developments must be supported by a biodiversity appraisal’</p> <p>It is outside the remit of a neighbourhood plan to dictate the documents that are required to accompany a planning application. Validation requirements are set out in the validation criteria. If</p>	Remove the requirement for a biodiversity appraisal.	Noted and removed. Placed as a recommendation in the supporting text.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
		required this will be requested by our validation team or the planning officer.		
95.	B	<p>Any BNG should also be provided on site in the first instance and compensation only considered where it can be proven that all measures have been taken to first avoid harm and then mitigate. I would suggest you include the mitigation hierarchy in the policy, perhaps at the beginning?</p> <p>This also refers to the appraisal which the requirement for is outside the remit of a neighbourhood plan</p>	<p>Perhaps Criteria B could be preceded by:</p> <p>"Development proposals must follow the mitigation hierarchy when considering their impacts on biodiversity and seek to first avoid any adverse impacts, mitigate for impacts to minimise their effect and as a last resort compensate for any harm"</p>	Noted and amend.
96.	C	<p>'should be hypothecated within the Parish and must be agreed by the Local Planning Authority'</p> <p>Is there an alternative to the word hypothecated?</p>	<p>Consider rewording criteria as follows :</p> <p>Measures to achieve BNG and / or mitigation measures should be provided on site wherever possible. If it is demonstrated that sufficient measures cannot be provided on site, they should be provided within the Parish and as close to the site as possible.</p> <p>Measures to achieve biodiversity net gain, mitigation or compensation</p>	Noted and amend.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
			involving the creation of habitat and/or relocation of species, should be hypothecated within the Parish Any measures must be agreed by the Local Planning Authority and include sufficient funding to support at least 30 years of post-development habitat management or land use change (in accordance with the Environment Act).	
97.	POLICY WAD14: BEWL WATER A	It is not clear from this policy exactly what you are trying to achieve. Do you just want to support the provision of a clubhouse or would you support any building in these two use classes? Part A is poorly worded and not sure the 'which' works with the rest of the criteria.	Clarification needed	Reword to: 'Development proposals within Use Classes F2 (b and c) in the Bewl Water area, as shown in figure 9.3 - including for a clubhouse with relevant facilities for the use of a non-proprietary, members' club for participants in the on-water activities - will be supported (subject to complying with other relevant Neighbourhood Plan and strategic policies). Proposals should: 'be...'
98.	i	Again, if economic, rural and tourism enterprise is supported, why does demand need to be demonstrated?		Remove.
99.	li	conserve landscape character only. Ref to doc not necessary. Also why only this document / evidence base?		Amend to 'conserve landscape character'.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
100.	v	highways criteria not necessary, covered elsewhere		Can be removed.
101.	viii	– not familiar with Medway Water (Bewl Bridge Reservoir) Act 1968. If landscape conservation enhancement required – then this is all that needs to be said? Landscape is covered in other policies.		Remove. Make reference to the Act in the supporting text.
102.	ix	‘are for the repair, maintenance, enhancement or rebuilding of bridges, culverts..... If this policy supports buildings within use class F2 it is unclear how it will also be for these other elements?’	Reword	May need to include this in the start of the policy e.g. ‘ Other than for supporting infrastructure (list out examples), development proposals within ...’
103.	9.32	‘all development should...preserve views across the wider countryside’ Preserving all views would be prohibitive to any form of development. Needs to be more specific to key views, identified based on criteria. Not all change within a view needs to be negative. To ‘preserve’ implies no allowable change, even where this might be positive.		Amend to ‘not have a significant detrimental impact on the views across the wider countryside’.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
104.	POLICY WAD15: VIEWS A	<p>‘Proposals with significant harmful impacts on the setting of the Parish will not be supported’.</p> <p>This needs to be further explained, what type of impacts? I think this relates to the key views as well (i.e. where will those impacts be) and yes what type of impacts.</p>	More explanation needed	<p>Amend policy to:</p> <p>A. The Plan identifies ten locally significant views/view clusters in paragraph x and in Figure x, with descriptions in Appendix x. As appropriate to their scale and nature, development proposals within the key views as shown on Figure x should be designed in a way that safeguards the locally significant view or view cluster concerned.</p> <p>B. Proposals for development should demonstrate the potential impacts that such a proposal would have on significant views where relevant and how these impacts will be mitigated.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
105.	B	<p>‘Proposals for development should be supported by a landscape and visual impact assessment’</p> <p>It is outside the remit of a neighbourhood plan to dictate the documents that are required to accompany a planning application. The validation criteria determine what is required to be submitted with an application. LVIAs are not currently on the list therefore we cannot require them to be submitted.</p>	Remove the requirement for an LVIA.	Remove.
106.	C	<p>‘Ten locally significant views’</p> <p>There are more than ten views shown</p> <p>‘development proposals within the shaded arcs of the various views as shown on the Figures should be designed in a way that does not impact the locally significant view or views concerned’.</p> <p>Any development within the view will have an impact</p>	<p>Either the policy or the map need to be amended so that they correlate.</p> <p>The view extends further than just the shaded arc therefore I would remove reference to this.</p> <p>The policy needs to be re-drafted in order to define the impact and what needs to be avoided e.g. development proposals within the key views shown in figure...should be designed in such a way so as to not have a negative impact on the landscape character of a key view as defined in the assessment of views in Appendix D.</p>	<p>There are ten views, some of which are divided into ‘view clusters’. Maybe better to describe them as view/view clusters?</p> <p>See note above.</p>

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
107.		SEE SEPARATE DETAILED COMMENTS REGARDING VIEWS PROVIDED UNDER GENERAL COMMENTS		
108.	WAD16: LOCAL GREEN SPACES	<p>'Local policy for managing development on a Local Green Space is consistent with policy for Green Belts (NPPF 101);'</p> <p>What is meant by local policy? Do you mean NPPF para 103?</p>	This needs to be clearer.	Amend to: Development proposals within the designated local green spaces will be consistent with national policy for Green Belt.
109.		<p>'proposals for development on Local Green Spaces will not be supported unless they conform to national policy guidelines'.</p> <p>This needs to be more specific, which part of national policy? What are these guidelines?</p>	Further explanation needs to be given.	
110.		SEE SEPARATE DETAILED COMMENTS REGARDING LOCAL GREEN SPACES		
111.	WAD 17: DARK SKIES	112. I would separate out the last sentence of criteria iv) and put that as Criteria C and current Criteria C as Criteria D.	<p>Consider amending the wording of criteria a to</p> <p>Proposals for development will be supported where it is clearly</p>	Amend as suggested.

Ref.	Para/ Policy Reference	Comment	Suggested change/ recommendation	SG proposed response
			demonstrated that all opportunities to reduce light pollution have been taken	
113.	WAD 18: COMMUNITY FACILITIES	<p>The formatting of using letters and numbers should be looked at for this policy. It is currently confusing.</p> <p>What about if a community facility is no longer needed/ there is no demand? This should be added to the start of II?</p> <p>'The facility is either no longer viable, or is no longer needed by the community'</p>		<p>Noted – add:</p> <p>'the facility is surplus to requirements and there is no longer a proven need for such a facility.'</p>
		SEE SEPARATE DETAILED COMMENTS REGARDING COMMUNITY FACILITIES		

APPENDIX E Copy of letter to WDC from the WNPSG about the Design Codes

8th March 2023

Dear Wealden District Council Strategic Planning Department,

Comments on Phase 2 Wadhurst Neighbourhood Plan Regulation 14 Consultation - Wadhurst Design Code

Thank you very much for taking the time to review Wadhurst's Design Code so extensively and thoroughly. We are very grateful. We have taken on board some of your comments in an updated submission.

We would however like to highlight two points.

Level of prescription

Firstly, we do feel that there is a profound discrepancy between, on the one hand, one of your core overarching points about the level of prescription in our code and, on the other hand, with the intent, direction and detail of national policy as set out in the Government's response to the Building Better Building Beautiful Commission, the National Planning Policy Framework (NPPF), the National Model Design Code (NMDC), advice from the Office for Place and the Secretary of State's letter to council leaders (*Creating Beautiful, Popular, Healthy and Sustainable Places*) dated 1 December 2022.

We would therefore like to take this opportunity to draw this to your attention as we judge it will be impossible for us both to respond to some of your detailed comments whilst also following guidance and national policy and intent. Although we cite some sections of these documents below, for ease of reference we also attach the Secretary of State's 1 December letter as Appendix One to this note and guidance from the Office for Place issued on 14 February 2023 as Appendix Two.

Most pertinently, on p. 2 of your note to us, you state that:

"Certain requirements are very prescriptive and could lead to the homogenisation of the area. You could use an approach that says 'Applicants must consider XXXX' rather than being prescriptive about specific elements....

We are uncertain for this design code whether you can say 'must' on the basis that the design code is so prescriptive. Also, the 'can' could also be misleading, as each planning application will be considered on its own merit and what may be important to one application in design terms may not be so important to another and vice versa."

You then pick this up in many of your specific points where you state that our code is "overly prescriptive."

However, we believe that your advice profoundly contradicts the Office for Place whose "10 criteria to effective design coding" advise those writing codes to:

"4. Keep them short, visual and numerical wherever possible. The codes must be clear and brief, concentrate on essential points, should be illustrated with analytical diagrams, such as

sections, not just 'reference images', and must be written and presented in a way that can be understood by both professionals and non-professionals.

6. Set definitive requirements through the use of language. Codes must set requirements to which a design can unambiguously conform or not conform (this will be based on words like, 'must', 'will' and 'required'). Guidance can also be usefully included but this must be made clearly distinct from the codes (guidance will use words like, 'should', 'could', 'would', 'generally' etc.)"

The Secretary of State's 1 December letter suggests following this advice. It asks leaders:

"to prepare design codes now. The Office for Place will be launching a new website, to provide practical and helpful recommendations and guidance to local authorities and communities. This website is a starting point, and we will evolve it as the Office for Place's work grows."

The Secretary of State's advice and the Office for Place's advice on using design codes to de-risk planning is in profound agreement with government policy for some years. For example, the Government's response to the Building Better Building Beautiful Commission published in January 2021 agreed that:

"There is a compelling case – which the Commission's findings reinforce – for more certainty about design principles and what is likely to be accepted. This can benefit applicants, communities and planning authorities alike, and it is clear that more can be done to embed this in practice."

The 2021 NPPF therefore states at paragraphs 127 and 128 (paragraphs 129 and 130 in the December 2022 consultation) that:

"Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable."

"To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences."

Presenting to the RIBA on 31 January 2023, one of the authors of the NMDC (David Rudlin), the advisory chair of the Office for Place (Nicholas Boys Smith) and one of the board members (Robert Adam) all stressed that the very defining essence of design codes is their use of "must" to give planning certainty. A prominent planning lawyer was consulted who suggested that a prescriptive design code as part of a neighbourhood plan is fully aligned with the NPPF.

We therefore judge that our code is following both the intent and the detailed guidance of national policy advice for effective design coding.

Length of design code and repetition of evidence

On p.2 of your note to us you state that the:

"The Wadhurst Design Code has very limited evidence or analysis to support the design code points."

“The Character Appraisal and other evidence should then be used to justify each element of the design code.”

You then pick this up in many of your detailed comments where you request further evidence to justify many specific elements of the design code. We agree that the code as previously drafted does not set out as clearly as it could the underpinning evidence. As you know, there is a very wide range of excellent and detailed local characterisation studies on which we have been able to draw. The main studies considered and reviewed in detail are:

- The Wealden Design Guide;
- The High Weald Housing Design Guide;
- The High Weald AONB Management Plan; and
- The Wadhurst Character Assessment.

An example of the process by which these documents were referenced is provided in Appendix Three. In addition, Appendix Four sets out the community engagement and evidence of local support for our design code as it has emerged in detailed response to these local character studies. We have made these points clearer in the new submission. Thank you for the feedback.

However, we do worry that the level of evidence for most design elements you appear to be seeking for most specific elements of the code would effectively make the Code unusable as a practicable document for those involved in the design and development process. To reiterate, the fourth point in the guidance on effective design codes from DLUHC’s Office for Place states:

“4. Keep them short, visual and numerical wherever possible. The codes must be clear and brief, concentrate on essential points, should be illustrated with analytical diagrams, such as sections, not just ‘reference images’, and must be written and presented in a way that can be understood by both professionals and non-professionals.

Whilst we appreciate your feedback on this point, due to our strong belief that the document has to work as a practical tool, we consider that this would reduce the usability of the document.

Conclusion

Thank you again for the time you have put into your feedback to us. It has helped with our final draft. However, we do hope that these points are helpful to you as you consider the purpose, structure and content of both this design code and others that no doubt are or will be created in months and years to come within Wealden District.

Because we believe that your advice to us raises nationally-significant issues about the tension between current planning practice and national guidance and policy, we are taking the liberty of sharing this letter with the leader of the Council, the Secretary of State for Levelling Up, Housing and Communities and the chair of the Advisory Board of the Office for Place.

Yours sincerely

The Wadhurst Neighbourhood Plan Steering Group
cc: Cllr Ann Newton, Leader Wealden District Council

Rt Hon Michael Gove MP, Secretary of State, Department for Levelling Up, Housing and Communities
Nicholas Boys Smith, Chair, Advisor Board, Office for Place

Appendix one: Secretary of State Letter to Council leaders, 1 December 2022



Department for Levelling Up,
Housing & Communities

Rt Hon Michael Gove MP
*Secretary of State for Levelling Up, Housing and
Communities*
Minister for Intergovernmental Relations

**Department for Levelling Up, Housing and
Communities**
4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

To: Council Leaders in England

1st December 2022

Dear Leader,

CREATING BEAUTIFUL, POPULAR, HEALTHY AND SUSTAINABLE PLACES

The Government considers that beauty and good design are central to levelling up and good place-making. In July 2021, the **National Planning Policy Framework** established beauty as an overarching objective alongside sustainable development and stated that all development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design. It asks all local planning authorities to prepare design guides or codes, taking into account guidance contained in the National Design Guide and National Model Design Code. These updates were made to empower councils to set clear standards for what they and the local community find beautiful and to refuse what they find ugly.

To support you and your communities, we have set up the **Office for Place**, at present within my department, to champion design and beauty in placemaking by helping you and your communities turn your visions for beautiful towns, cities and neighbourhoods into local standards that all new development should meet.

As local leaders, you have a huge role to play in delivering these ambitions for creating better neighbourhoods for everyone, everywhere.

There are four things that I am asking you to do today, to support your communities.

- First, to **speed up permissions for well-designed places, and turn down applications for badly designed places**. I'm delighted that some local authorities and developers are reporting that the changes to national planning policy are helping, ensuring that the quality of development is considered, as well as the number of new homes. I urge you to act with similar confidence in accordance with the National Planning Policy Framework. Developments that are not well-designed should be refused planning permission and housing targets should not be used as a justification to grant them permission. As Secretary of State, I will support you and your officials in this mission.
- Second, to **prepare design codes now**. The Office for Place will be launching a new website, to provide practical and helpful recommendations and guidance to local authorities and communities. This website is a starting point, and we will evolve it as the Office for Place's work grows.

- Third, to **appreciate the role of placemaking in levelling up by recognising the need for strong leadership within your council.** Having senior officials with a design and placemaking remit, and having officers who have the requisite urban design, conservation, and landscape skills has led to huge benefits in terms of the quality of placemaking and associated benefits including health, wellbeing and biodiversity. I'd encourage you to think about how you can make sure there is strong design capacity and leadership within your council and that officers are enabled to work productively and constructively with you as council leaders. Neighbourhoods where people can thrive are about more than just well-designed homes. It is about supporting the creation and stewardship of popular, healthy, beautiful and sustainable places.
- Fourth, to **make use of the tools you have available to you to promote beautiful and sustainable development in your area.** There have been examples of Local Development Orders or Neighbourhood Development Orders being created with a design code to enable development that is beautiful to come forward at a smaller scale. There is also an important role for neighbourhood planning.

If you do encounter aspects of process or policy which make it harder to achieve these ends, please do share them with my department or the Office for Place.

This country is creating some of the best places to live in the world. But it's too rare. We must do so far more often for the betterment of our neighbours, for the advancement of our economy and for the delicacy with which we tread upon the planet.

With every good wish,

A handwritten signature in black ink that reads "Michael Gove". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the surname "Gove".

RT HON MICHAEL GOVE MP
Secretary of State for Levelling Up, Housing and Communities
and Minister for Intergovernmental Relations

Appendix two: Office for Place's ten criteria for effective design coding

There are available here: [10 criteria for effective design coding - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

"These 10 criteria for effective design coding have been developed by members of the advisory board for the Office for Place. They are designed to provide a framework of good practice in the preparation, application and enforcement of design codes, based on the board's experience of preparing and working with design codes.

This list does not constitute government planning policy or guidance, it is designed as a helpful tool for local authorities, neighbourhood planning groups and all those involved in creating effective, local

design codes. For detailed government guidance on design codes, please refer to the [National Model Design Code](#).

1. Set a clear vision. A clear and concise vision, setting out ambitions for the area, must be prepared at the start of the design coding process. This will act as a guide, be relevant to the area and record straightforward aspirations so that future action can be evaluated.

2. Align with policies and be evidence based. Codes will take into account relevant national and local planning policies and have a basis in evidence of the types of places that support well-being and deliver healthy and sustainable outcomes for communities, and places that are safe and inclusive.

3. Find out what people really like. The codes must be based on robust evidence that has been obtained on what is popular about the design and character of the existing area, and the potential future for the area, and this must be apparent in the way the codes are worded and illustrated.

4. Keep them short, visual and numerical wherever possible. The codes must be clear and brief, concentrate on essential points, should be illustrated with analytical diagrams, such as sections, not just 'reference images', and must be written and presented in a way that can be understood by both professionals and non-professionals.

5. Keep them practical. The codes must apply to practical choices that are achievable in the design and construction of new places, streets and buildings without unduly restricting the opportunities for creativity.

6. Set definitive requirements through the use of language. Codes must set requirements to which a design can unambiguously conform or not conform (this will be based on words like, 'must', 'will' and 'required'). Guidance can also be usefully included but this must be made clearly distinct from the codes (guidance will use words like, 'should', 'could', 'would', 'generally' etc.)

7. Keep them real. Codes must provide sufficient information to direct design to what is demonstrably popular (see 3, above) in such a way that the results will be recognised by the local community, while allowing opportunities for creative input.

8. Keep them relevant. What is coded must be relevant to the area that is being coded, taking into account the context and scale of development. For example, it might be appropriate to code for: the density required, the context of new development, relationship to what is existing, what must be conserved; the urban, suburban, rural or new character of the area covered.

9. Make sure they are enforced. Local authorities must use or establish a process for the approval of codes prepared by others and all codes must be enforced at appropriate points in the process.

10. Allow them to change over time. Design codes should reflect changes in social, technical and environmental circumstances and so should be reviewed from time to time, taking into account feedback from the outcomes of the code."

Appendix three: alignment with Wealden Design Guide

The Wealden Design Guide and High Weald AONB Housing Design Guide have been regularly referenced during the drafting of the design code and there is a note in the first chapter of the code that both documents should be referred to in conjunction with Wadhurst's code.

Prominent areas of alignment with the Wealden Design Guide include:

2.6 Local distinctiveness: By encouraging the use of local materials and architectural styles, the design code aligns not just with the Wealden Design Guide but also Planning Policy Statement PPS1, which requires new development to make a positive contribution to the character and identity of a place.

3.16 Boundaries: the Wadhurst code requires traditional boundary walls or natural boundaries such as hedges, improving local character and biodiversity

3.18 The impact of lighting: prescriptive codes on lighting ensure minimum light pollution

4.2 and 4.3 New and historic buildings: prescriptive codes on details such as windows and doors ensure they will be built from materials which are sustainably produced and recyclable

4.8 SuDS: the preference for small scale SuDS solutions is better for drainage, biodiversity and the design of new places

5.10 Architectural principles and details: the Wealden Guide strongly encourages buildings which fit in with their scale, massing and roof pitches. We have expanded on this in our design code.

5.10.8 Windows and doors: we follow-up from this guidance by being more prescriptive on the types of windows and doors acceptable locally.

8.4 Paving and hard surfacing: paving materials are a distinct part of the character of Wadhurst and we have built on this in our code whilst encouraging permeable solution.

8.6 Street furniture: The street furniture in our design code is "of a quality and character which is appropriate to its immediate and wider setting" as recommended in the Wealden Design Guide

8.7 The impact of lighting: we elaborate on this policy with greater specification how to meet it and recommend lighting which fits with the existing character whilst using modern LED lighting.

10 Residential alterations and extensions: this chapter in the Wealden Design Guide is already excellent so we did not feel the need to expand greatly on it.

13 Shopfronts and signage: we have expanded on this section by focusing on issues identified locally. Particularly we strengthen 13.2.3 by encouraging the preservation of the historic character of Wadhurst's High Street.

Appendix four: statement of engagement to date

Given concerns have been raised regarding the breadth of engagement conducted for the design code, we think it useful to reiterate the engagement which has been conducted. We also think it useful to note Wadhurst's population, approximately 4,900 people, which should be considered in proportion to the number of responses in engagement.

Engagement was conducted in three main stages:

- 1) *Neighbourhood survey.* Feedback from the community at the start of the neighbourhood plan process refined in detailed responses from the Neighbourhood plan household survey.
- 2) *Online survey.* Interactive map using the Create Communities tool (advertised in Summer 2021 Reg 14 phase 1 consultation; promoted via social media, posters, website, household leaflet drop, Focus magazine.)
- 3) *Regulation 14 phase 2 consultation* on the finished design code as requested by WDC as part of formal engagement for the neighbourhood plan.

1. Neighbourhood plan household survey and character assessment

In March 2019, a household survey was undertaken with surveys sent to all 2,237 households in the parish. A total of 997 responses were received.

- 913 out of 921 respondents (99%) felt that **the visual impact of the development on the surrounding countryside** is very important or important;
- 858 out of 909 respondents (94%) felt that **being sympathetic to existing stock** is very important or important;
- 828 out of 895 respondents (93%) felt that **natural/appropriate local materials** are very important or important; and
- 835 out of 886 respondents (93%) felt that it is very important or important that any new housing developments should **create a community feel**.

A character assessment was also undertaken in 2018.

Results from the household survey, in conjunction with the Wadhurst Character Assessment, were referenced in creating a design code reflecting the most important concerns for the community. They guided areas where codes were more or less prescriptive, or where something should be a 'must' or a 'should.' For example, some of the most prescriptive codes are for using local materials and colours. Further details about the community's greatest concerns were discerned during the next stage of engagement, using the Create Communities tool.

2. Interactive map using the Create Communities tool

In June 2021, prior to drafting the design code, we used the Create Communities platform to gauge the preferences of the local community. We have received a respectable 106 responses to the exercise, which asked respondents to choose a place or building which they liked or disliked. This was followed up by optional further questions relating to the details of the selected place.

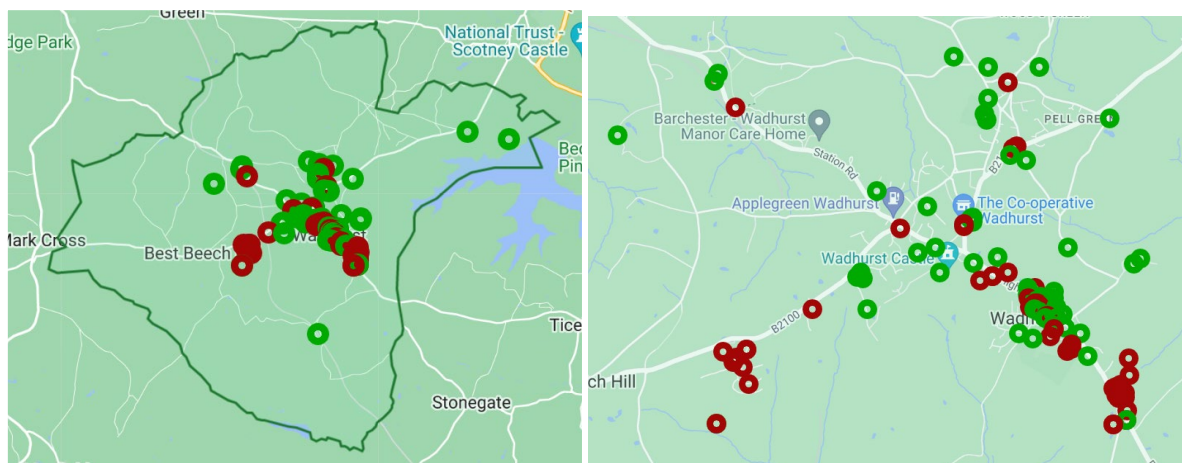
58 responses were places people liked, 48 responses places they disliked, giving a good balance of local characteristics which people liked or didn't like or, in other words, those they would like to avoid or encourage in future developments. The data from the exercise was then used to draft the code.

Further questions on the map included:

- If you liked this place, what kind of setting would it be appropriate for? (Choice of rural, village, town centre or other)
- What else stood out as positive or negative about this place?
- Do you like the materials?
- Does it have a sense of place (it feels like it belongs in the Parish of Wadhurst)?
- Do you like the ornamentation and decoration?
- Do you like the proportions (including windows, doors and dormers)?
- Does it fit with the neighbouring buildings?
- Do you like the pavement materials?
- Do you like the road materials?
- Is it pedestrian friendly?
- Are there good cycling routes?

- Is there good public transport from this location?
- Do you like the feel of the green spaces?
- Are biodiversity and nature well integrated?
- Are commercial and community uses well integrated?
- Is the parking designed and integrated well?
- Do you have any other comments?

The original map can be found here: <https://communities.createstreets.com/Wadhurst>



Screenshots of the Create Communities map for Wadhurst showing the geographic spread of the 106 responses, colour coded for places people liked and disliked. As can be seen, liked places are concentrated in the town centre, while new developments are least liked

There was a clear preference for buildings which fit into their setting and concern about newer buildings which stood out. Liked buildings often listed “in keeping” or “typical Wealden” as positive aspects and highlighted natural materials. In contrast, several disliked buildings included comments about being “out of keeping” or built from cheap materials.

Key themes emerging from responses.

In Keeping: Harmonious with existing styles vs ‘identikit’ developments

- When asked ‘What else stood out as positive or negative about this place?’ 25% of responses referred to their chosen location as being in keeping, or not in keeping with the area.
- ‘...the overdevelopment of the plot (Wadhurst Place) feels unsympathetic to the area’
- New developments such as Waters Reach were considered to be not in keeping with Wadhurst while local shops (such as Barnett Books) and places of worship considered to be in keeping.

Proximity: New buildings are too close to one another

- In a freeform questionnaire, 8% of responses made reference to the spacing of homes, where ‘well spaced’ family homes were preferred to ‘far too many houses packed onto [a] plot’. Some new builds were considered to be encroaching on old buildings and the natural environment.

Views: Preservation of the landscape

- Views of Wadhurst's natural landscape give ‘a sense of being a single community with a common identity.’

- In a freeform questionnaire, 9% of responses either celebrated the views from their chosen location or criticised the loss of views
- *'A lot of houses seem to have been squeezed very close to the existing village and the village lost such beautiful views.'* (Waters Reach)
- *'One of the best views in the county of East Sussex.'* (The Donkey Steps)

Getting around: Public transport and parking infrastructure are lacking

- When asked *'Is there good public transport from this location?'* 67% of those that responded answered no and when asked *'Are there good cycling routes?'* 84% of those that responded said no.
- *'No attention to parking in plans leaving the village car parks to be used a school overflow parks thus preventing shoppers from accessing the town easily.'*
- A narrowed high street has been highlighted as causing congestion with cars and lorries having to compete for spaces.

In the details: Material choice and quality

- Waters Reach is considered to be constructed using *'cheap materials'*
- Green Square is *'Imaginatively designed'* with *'good materials and use of space'*

Places people liked the most

- Development on the site of the former red lion pub - *'Well-ish proportioned and appointed. Owners have made good use of green space. Style not unfitting with local style.'*
- Church Street cottages and Gate House - *'From the front and the back they have a sense of place, and are both very old, but also timeless.'*

Places people disliked the most

- Wadhurst Place - *'The old school building has been nicely restored. However, the overdevelopment of the plot feels unsympathetic to the area'*
- Waters Reach – One respondent said *'this is an identikit development of executive homes that spoils the approach to the village and detracts from the HWAONB beauty'* while another that *'A lot of houses seem to have been squeezed very close to the existing village and the village lost such beautiful views.'*

How the Create Communities responses influenced the code

The responses allowed us to compare which places people liked and which they disliked, and for what reasons. The code then aimed to amplify the most liked aspects while making it harder to build the kinds of places residents disliked.

For example, the two most disliked places, Wadhurst Place and Waters Reach, are both suburban in nature, with residents feeling they didn't reflect local architectural traditions or provide the kinds of homes the local community needs. This influenced a code aimed at smaller homes with local architectural details and materials. Concerns about the scale of the SuDS at Waters Reach led to a SuDS section prioritizing smaller solutions integrated into the street scene.

Concerns over the scale and style of the large local supermarket influenced the inclusion of a code for shopfront designs.

3. Feedback on the finished design code as part of Reg 14 consultation for the neighbourhood plan

We undertook Reg 14 phase 2 consultation on the finished design code as requested by WDC as part of formal engagement for the neighbourhood plan. No formal comments were received from residents during this stage.

