



Neighbourhood Plan Review

Statement of significance of the modifications:

As updated for the submission version of the Plan following the Regulation 14 consultation



June 2026



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1. Introduction

The Hailsham Neighbourhood Plan was ‘made’ in July 2021, albeit work on the Plan was fundamentally undertaken between 2017 and 2018, with the Referendum and making of the Plan delayed as a result of the Covid-19 pandemic.

The Plan has been subject to review and submitted for Examination. The need for the review was triggered in response to changes that have taken place since the Plan was first prepared and which include:

- Ongoing growth and expansion of Hailsham, which has seen new residential development in the area, including that in adjacent Hellingly which, although outside of the Plan area, has implications for Hailsham in the way that services and facilities are used.
- The emergence of a new draft Local Plan being prepared by Wealden District Council which establishes requirements for further development in Hailsham.
- Changes at the national level, including increasing awareness of the impacts of climate change, and the importance of health and well-being, as well as new planning policy/guidance, changes to permitted development rights, and the relationship between good design and creation of attractive, liveable and healthy places.

The review process commenced in April 2024 and was subject to the Regulation 14 consultation stage between January and March 2026. Prior to this stage:

- A ‘health check’ of the made Plan was undertaken (see the Appendix), reviewing the relevance of policies against the changing policy context represented by updated to the NPPF and other national legislation, as well as the emerging Local Plan. The effectiveness of policies was also considered against planning applications submitted and determined in Hailsham since the Plan was made. This identified areas where the policies in the Plan have been superseded but also where additional or new policy is required.
- Three separate rounds of consultation were undertaken to help draw our priorities for Hailsham, areas of focus for the Plan and opportunities for intervention. These took place in October 2024, January to February 2025, and June 2025.
- A Statement of the Significance of the Modifications was prepared for the Regulation 14 Consultation. Following review of consultation responses and changes to the Neighbourhood Plan as a result of this the Statement of Modifications has been updated as appropriate.

2. Modification Statement

Planning Practice Guidance (PPG) advises that there are three types of modification that can be made to a Neighbourhood Plan. These are:

- 1) Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.
- 2) Material modifications which do not change the nature of the plan or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.
- 3) Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.

Planning Practice Guidance also states that:

- the qualifying body must (at the pre-submission publicity and consultation stage and when the modified plan is submitted to the local planning authority) state whether they believe that the modifications are so significant or substantial as to change the nature of the plan and give reasons.

The requirement for such a statement is established in Regulation 15 of the Neighbourhood Planning (General) Regulations, which states:

- in relation to a modification proposal, a statement setting out whether or not the qualifying body consider that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the qualifying body is of this opinion.

In respect of the modification types set out in the PPG:

- 1) The review represents more than minor (non-material) modifications.
- 2) The PPG says that if the made Plan includes design policies that are intended to help shape growth, then modifications that seek to take these forward and supplement them with production of a Design Code would be unlikely to represent a change to the nature of the Plan. This applies to the review of the Hailsham Plan.

- 3) The PPG also says that material modifications which might change the nature of the Plan include the inclusion of site allocations. Neither the made Plan nor the review of it include allocations.

Based on this, the modifications to the Plan would represent modification type (2) as set out in the PPG, i.e.: they are material modifications, but they do not change the nature of the Plan.

However, the draft revised Plan includes new policies, albeit these respond to the overarching vision of Hailsham as a ten-minute town encapsulated in the made Plan. It is also accompanied by a new Design Guide (Hailsham Design Guidelines) that further develops design policies in the made Plan. It does not include allocations for new development. As with the made Plan, the review takes a pragmatic approach: it recognises that development will come forward, that the scale and direction of this still needs to be fully tested through the Local Plan process, but that a principles-based approach should be taken to influence the form and quality of that development.

The changes presented in the draft revised Plan are intended to support continued use of the Neighbourhood Plan, improve the clarity of the Plan and support more effective implementation of the vision and aspiration for Hailsham. The modifications are consistent with the overall direction of the made Plan and although new policies have been introduced these are aligned with the overall thrust and direction of policy in the Made Plan. They would not give rise to a different spatial strategy.

Despite this, there are a fairly significant number of new policies presented in the review of the Plan, including those which address new or updated policy areas. The review of the Plan has changed the overall structure of the Plan and the number and focus of policies contained within it. In terms of comparing the made Plan with the review of this:

The made Plan	The draft review
The made Plan contained 27 policies and six projects	The draft review now contains 34 policies and ten projects. Some of the existing policies have been amalgamated. In total, there are fifteen new policies in the draft review.
The made Plan was accompanied by a Character Assessment and included a number of design related policies but was not supplemented with a design guide or code.	A set of Design Guidelines have now been prepared as a free-standing document which supplements policies in the draft review of the Neighbourhood Plan.
The made Plan does not allocate sites for development	The draft review of the Plan does not allocate sites for development

The made Plan	The draft review
Policies were presented across the following main topic areas: Habitat Regulations, Design Quality, Promoting Active, smarter and Sustainable Travel, Enhancing Green Space and Biodiversity Value, Employment, Community Facilities, Tourism, Air Quality and Renewables, The Growth of Hailsham, Hailsham Town Centre.	Policies are presented across five main topic areas, albeit some of these cut across the wider topics in the made Plan and thus streamline the way these are presented. The main topic areas are: Community, Town Centre, Housing Development and Design, Movement, Green and Blue Infrastructure.

In response to this:

It is the view of the Town Council that the review of the Plan and the changes made to it comprise material modifications and that an examination will be required. The number of new policies presented in the review of the Plan, and focus of these, are considered substantial enough to change the nature of the Plan, and thus trigger the requirement for a referendum to be held. In short, and in line with the three options presented in the PPG, the review represents modification type (3).

Ultimately, it will be for the Examiner to determine whether a referendum is required.

The next section of this Modification Statement provides a summary of the changes made to the policies in the Plan, ordered according to policy theme.

3. Summary of Modifications

In terms of the key differences between the made Plan and the draft revised Plan:

Structural change

- The Plan period has been amended to reflect the timeframe of the emerging Wealden Local Plan, and now runs to 2042.
- The vision has been updated. This has a similar intent to that in the made Plan although it has been redrafted to respond to specific feedback captured through the consultation process. The vision now has a broader sustainability focus, making reference to matters such as climate resilience, integrated communities and green infrastructure.
- The set of objectives have been reframed. The made Plan included nine objectives, which has been reduced to five in the draft revised Plan. These specifically focus on the priorities for Hailsham raised in response to consultation, though do cover similar topic areas, such as quality of design, accessibility and the future of the town centre.
- Overarching principles established in the made Plan are carried forward into the review. The ten-minute town concept was strongly endorsed through consultation, as was the need for an approach to good placemaking and better access for all, particular in terms of active and sustainable travel.
- Policies in the draft revised Neighbourhood Plan are framed around the five main objectives, with each policy chapter of the Plan thus having a focus on a specific theme. This helps demonstrate how the policies (and wider project ideas) within the Plan directly relate to the objectives, the vision and thus the consultation undertaken to inform it. The changes presented in the policy sections within the draft revised Plan are discussed under the headings that follow below.
- A set of Design Guidelines have been prepared alongside the Neighbourhood Plan and have been referenced as appropriate in policies in the revised Plan, strengthening the suite of design policies in the made Plan.

Policy section: Community Facilities

- The approach to community facilities in the draft revised Plan has been further developed, with an expanded policy suite now presented.
- The made Plan presented a relatively generic policy applicable to all community facilities, but this has now been expanded with policies drafted that apply to different types of facility.

- This represents strong feedback from the community in respect of the importance of delivering such facilities alongside growth. Community policies in the revised Plan are generally broader, more prescriptive, and embed matters such as health and social inclusion.

Town Centre

- Policies in the Made Plan had a focus on land uses, design principles, car parking, shopfronts and quality of the public realm. Whilst these policy themes are taken forward in the draft revised Plan they have been expanded and supplemented with additional policies.
- New policies include those in respect of safety by design, town centre gateways and green infrastructure, public art and the roofscape.
- This section of the draft revised Plan is also supported by wider ideas in respect of the High Street and how this might be part-pedestrianised in the future. This is a key aspiration that responds to consultation feedback. It is not embedded in the Plan as a policy but is identified as a project opportunity that the Town Council would be keen to develop further in partnership with the District and other stakeholders.

Housing, Development and Design

- Policies in the Made Plan sought to encourage high quality design, for larger and small sites, the design of self and custom build homes, and residential car parking provision. The made Plan also supported production of development frameworks for areas of growth and established design and placemaking principles for these.
- The focus on good design remains central to the Plan. The importance of design and character has been strengthened through production of the Design Guidelines. This helps bring greater clarity as to what is meant by good design in the context of Hailsham.
- The draft revised Plan introduces new policies in terms of housing mix and type, and presents expanded policies in respect of parking and street design, drawing on the Design Guidelines.
- Policies in respect of sustainable design and construction are carried over from the made Plan, albeit the policy wording has been updated to reflect wider changes made in this field at the national level, and with design principles incorporated in the policy.

Movement

- Policies in the Made Plan had a focus on active travel, improvements to the Cuckoo Trail, and bus connectivity to Polegate.
- The draft revised Plan retains and expands upon the policies in the made Plan. Existing policies have been expanded and a new policy introduced in respect of community mobility hubs.
- A set of active travel projects are identified alongside the Policies and which the Town Council is keen to explore the feasibility of.
- Reference is also made in this section of the draft revised Plan to issues of street maintenance which was raised through consultation but where responsibility for intervention lies elsewhere and thus does not feature as a Policy.

Green and Blue Infrastructure

- Policies in the Made Plan have a focus on the provision of new green space, including natural and amenity space, and protection of the Pevensey Levels.
- The draft revised Plan expands upon the Made Plan and has a stronger emphasis on biodiversity, climate adaptation and a resilience to flooding.
- New policies establish a cascade approach to the delivery of biodiversity net gain, as set out at the national level, retaining and strengthening green corridors, encouraging a multifunctional approach to the use of SuDS and seeking to minimise the paving over of front gardens.
- The draft revised Plan also introduces a new policy in respect of diversifying green space, integrating opportunities for play, food growing and other semi-natural green space typologies.

These changes are all considered significant enough to comprise material modifications.

4. Policy overview

This section of the Modification Statement provides an overview of the policies contained in the Made Plan and how they have been changed in the draft revised Plan. This indicates what type of modification they represent in terms of the three types set in the PPG.

Policy in Made Plan	Summary of changes in draft revised Plan
HAIL HRA1: Habitat Regulations	Deleted from the draft revised Plan. The HRA Screening of the draft revised Plan concludes that an appropriate assessment of the Neighbourhood Plan is not needed, and that the provisions of the Habitats Regulations, in relation to assessment at the planning application stage, can be relied upon. <i>This represents modification type (1) in the PPG.</i>
HAIL D1: High Quality Design	This policy is developed further through production of the Hailsham Design Guidelines, which is referenced in multiple policies in the draft revised Neighbourhood Plan. Policy HaHD1 establishes general principles for good residential design which is supplemented by Policy HaHD2 in respect of how development should be integrated within the existing built form. Policy HaTC2 establishes design principles for the town centre and Policy HaTC3 has a specific focus on creating safe and inclusive spaces for all. <i>This represents modification type (2) in the PPG.</i>
HAIL D2: Small scale residential development and householder extensions	This is not specifically taken forward in the draft revised Neighbourhood Plan but is rather integrated within an overall approach to good design set out in policy HaHD1 which establishes an approach to good design, and Policy HaHD2 in respect of integrating development within the existing built form. These policies cross

Policy in Made Plan	Summary of changes in draft revised Plan
	reference the Design Guidelines which includes a section on small sites. <i>This represents modification type (2) in the PPG.</i>
HAIL D3: Innovation and Variety	This is incorporated within Policy HaHD1 of the draft revised Plan. <i>This represents modification type (2) in the PPG.</i>
HAIL D4: Design for self and custom build homes	This is taken forward into Policy HaHD5 of the draft revised Plan which updates the wording and also includes cross reference to the Design Guidelines. <i>This represents modification type (2) in the PPG.</i>
HAIL D5: Residential Car Parking Design	Taken forward and expanded upon in Policy HaHD7 of the draft revised Neighbourhood Plan. This draws upon the associated Design Guidelines to clarify expectations with regard to good parking design in residential areas. <i>This represents modification type (2) in the PPG.</i>
HAIL AT1: Active Travel	Taken forward and expanded upon in Policy HaM1 of the draft revised Neighbourhood Plan and which includes new principles in respect of national standards (as set out in DfT 1/20 and associated Cycling Level of Service Tool), the Healthy Street indicators, the East Sussex Cycle Parking Standards, and the Local Cycling and Walking Infrastructure Plan. The Policy also now includes reference to the opportunity for last mile freight delivery to be made by cargo-bike. <i>This represents modification type (2) in the PPG.</i>
HAIL AT2: The Cuckoo Trail	Taken forward and expanded upon in Policy HaM2 of the draft revised Neighbourhood Plan. The Policy is expanded to include reference to recommendations from the Cuckoo Trail User Report and Strategy. Support is also

Policy in Made Plan	Summary of changes in draft revised Plan
	expressed for proposals for a ‘hub’ which include visitor and cycle facilities. This was previously presented as a project idea in the made Neighbourhood Plan (see project AT1). <i>This represents modification type (2) in the PPG.</i>
HAIL AT3: Public Transport	Taken forward and expanded upon in Policy HaM3 of the draft revised Plan which introduces walking catchment distances from bus services to be applied to major new development. <i>This represents modification type (2) in the PPG.</i>
HAIL GS1: Natural and Amenity Green Space	This is taken forward and expanded upon through multiple policies in the draft revised Plan. Policy HaGI1 establishes the approach to biodiversity and wildlife corridors. Policy HaGI2 seeks to retain and improve connections with the green and blue infrastructure network across Hailsham. Support for provision of amenity space in new development now incorporated into and expanded upon in Policy HaCF6, and which establishes additional principles in respect of the location, design and inclusivity of that space. <i>This represents modification type (3) in the PPG.</i>
HAIL GS2: Open Space within Major Development Areas	Now incorporated into and expanded upon in Policy HaCF6 which establishes principles for well located, designed and inclusive play and amenity space. <i>This represents modification type (2) in the PPG.</i>
HAIL GS3: Pevensey Levels	This is carried forward in Policy HaGI4 of the draft revised plan, although amended to provide clarity on development expectations in respect of landscape character and biodiversity. Wider flood risk matters are addressed in Policy

Policy in Made Plan	Summary of changes in draft revised Plan
	HaG15, which also sets out design principles for SuDS, cross referencing the Design Guidelines. <i>This represents modification type (2) in the PPG.</i>
HAIL EMPI: Providing for a mix of Employment Opportunities	Deleted from the draft revised Plan. It is superseded by the emerging Local Plan. <i>This represents modification type (1) in the PPG.</i>
HAIL CFI: Community Facilities	This is replaced in the draft revised Plan by a suite of new policies that address specific community facilities, including Healthcare (Policy HaCF1), Education (HaCF2), Community Halls, Centres and Hubs (HaCF3), Allotments and Food Growing (HaCF4), Sports Facilities and Playing Pitches (HaCF5), and delivery of community infrastructure (Policy HaCF8). <i>This represents modification type (3) in the PPG.</i>
HAIL TOU1: Tourism	Deleted from the draft revised Plan. It is superseded by the emerging Local Plan. <i>This represents modification type (1) in the PPG.</i>
HAIL AQ1: Charing Points for Electric Vehicles	Taken forward in Policy HaM5 of the draft revised Neighbourhood Plan. Clarifications have been made to the policy wording. Text in respect of the provision of charging points at new homes has been removed to avoid repeating Part S of the building Regulations. <i>This represents modification type (2) in the PPG.</i>
HAIL AQ2: Sustainable Design and Construction	Taken forward into and expanded upon in Policy HaHD3 of the draft revised Neighbourhood Plan. This now incorporates additional principles that proposals for development are encouraged to meet as well as

Policy in Made Plan	Summary of changes in draft revised Plan
	establishing water efficiency standards and support for energy efficiency measures to be incorporated into the refurbishment and retrofitting of existing buildings. <i>This represents modification type (2) in the PPG.</i>
HAIL AQ3: High Energy Efficient Buildings	This is incorporated into the wording for Policy HaHD3 in the draft revised Neighbourhood Plan. <i>This represents modification type (2) in the PPG.</i>
HAIL AQ4: Renewables	Deleted from the draft revised Plan. <i>This represents modification type (1) in the PPG.</i>
HAIL SD1: Development Frameworks	The requirement for a development framework for schemes that involve multiple land ownership areas is taken forward and embedded within Policy HaHD2 of the draft revised Neighbourhood Plan. This also establishes principles in respect of how new development should be integrated with the existing built form. Reference to delivery of infrastructure, including the relationship with major growth areas that cross multiple landownerships, is taken forward and expanded upon in Policy HaCF8 in the draft revised Neighbourhood Plan. <i>This represents modification type (2) in the PPG.</i>
HAIL SD2: Design and Placemaking Principles	This is taken forward in Policy HaHDI of the draft revised Plan which has been updated to reflect the principles established in the Design Guidelines. <i>This represents modification type (2) in the PPG.</i>
HAIL SD3: Design Codes and Quality	This is not specifically taken forward into the draft revised Neighbourhood Plan. It is superseded by the emerging Local Plan. <i>This represents modification type (1) in the PPG.</i>

Policy in Made Plan	Summary of changes in draft revised Plan
HAIL TCI: Hailsham Town Centre	This is taken forward and amended in Policy HaTCI of the draft revised Neighbourhood Plan, and which supports a range of uses in the Town Centre. <i>This represents modification type (2) in the PPG.</i>
HAIL TC2: Town Centre Design Principles	This is taken forward and further expanded upon in Policy HaTC2 of the draft revised Neighbourhood Plan. This incorporates reference to the principles contained within the Design Guidelines, and also provides clarity on the approach to development within the setting of a heritage asset. <i>This represents modification type (2) in the PPG.</i>
HAIL TC4: Town Centre Car Parking	This is taken forward in Policy HaTC8 of the draft revised Plan, with revised wording providing clarity on the approach to be taken. <i>This represents modification type (2) in the PPG.</i>
HAIL TC5: Shopfronts	This is taken forward and expanded upon in Policy HaTC4 of the draft revised Plan. It draws upon principles in the Design Guidelines, providing further clarity on how proposals should be judged. <i>This represents modification type (2) in the PPG.</i>
HAIL TC6: Streets and Spaces in the Town Centre	This is not directly taken forward in the draft revised Plan, although Policy HaTC5 does address the Public Realm, gateways and wayfinding. As per the made Plan, this seeks to the quality and attractiveness of the movement network, particularly for pedestrians. It provides further detail on proposals for improvements to arrival points or gateways into the town centre as well as wayfinding solutions to support orientation. <i>This represents modification type (2) in the PPG.</i>

A set of new policies have been introduced into the draft revised version of the Neighbourhood Plan. These are:

- Policies HaCF1 (Healthcare), HaCF2 (Education and Early Years), HaCF3 (Community Halls, Centres and Hubs), HaCF4 (Allotments and Food Growing Opportunities), and HaCF5 (Sport Facilities and Playing Pitches), all of which expand on the existing Community Facilities Policy in the made Plan and respond to community feedback highlighting the importance of delivering specific forms of community infrastructure across Hailsham. This was recognised in the made Plan, although not broken down by infrastructure type. *This represents modification type (3) in the PPG.*
- Policy HaCF7 (Burial Space). The made Plan included a Project in respect of providing additional Cemetery Space (see Project CF1). The draft revised Plan takes this forward into a policy which establishes principles that support appropriate provision of such space, but does not allocate land for this. *This represents modification type (3) in the PPG.*
- Policy HaTC3 (Safety by Design), which builds upon the good design theme within the made Plan but specifically responds to concerns raised through consultation as to concern for personal safety in the town centre. *This represents modification type (2) in the PPG.*
- Policy HaTC6 (Public Art) which expands upon public realm ideas and expands this to cover proposals for public art that can help enrich the quality and attractiveness of the town centre. *This represents modification type (2) in the PPG.*
- Policy HaTC7 (Roofscape) which builds upon Policy HAIL AQ2 in the made Plan by looking at how the roofspace of buildings might be better utilised to help respond to the climate change agenda, but also where greater use of that space might be made to help diversify the town centre offer (building upon existing Policy HAIL TC1 in the made Plan that supports a diverse, vibrant and vital town centre). *This represents modification type (3) in the PPG.*
- Policy HaHD4 (Housing Mix, Size and Type), which responds to consultation feedback that said that should new housing development come forward, then it should respond to local housing needs. This expands upon the reference in Policy HAIL D1 of the made Plan which states that proposals for development should provide for the necessary dwelling mix of future occupiers. The new policy provides greater clarity on what is expected. *This represents modification type (3) in the PPG.*
- Policy HaHD6 (Street Types, Design and Hierarchy). This reflects principles in the Design Guidelines. It reflects consultation comments as to the impact of the design of the street network in new development. It expands upon references in Policy HAIL SD2 of the made Plan in respect of creating a legible layout well-

integrated with the existing built form, and Policy HAIL SD I requiring development frameworks to present a movement plan that establishes the street hierarchy and typologies. The policy in the draft revised Plan provides greater clarity on expectations for future development. *This represents modification type (2) in the PPG.*

- Policy HaM4 (Community Mobility Hubs). This is a new policy that responds to consultation comments in respect of providing for a safe network of active travel, encouraging people to walk and cycle for shorter journeys, and the need for community facilities to be provided. This policy combines those aspirations and supports a network of community mobility hubs. This is directly relevant to the concept of the ten-minute town, being a place that is easy to get around and where the full range of services and facilities that support day-to-day activity can be easily accessed by all. *This represents modification type (3) in the PPG.*
- Policy HaG11 (Biodiversity) which reflects the provisions of the Environment Act in respect of biodiversity net gain, and how this should be delivered in Hailsham. *This represents modification type (3) in the PPG.*
- Policy HAG13 (Diversifying and improving existing amenity green space). This specifically looks at how existing underutilised amenity green space in Hailsham could be diversified, bringing benefits to this community by enhancing access to a wider range of green space types. *This represents modification type (3) in the PPG.*
- Policy HaG15 (Flood Risk and Sustainable Drainage) and HaG16 (Paving of Front Gardens) which respond to concerns raised through consultation in respect of the impact of development on the flood plain in which is a sensitive area with high risk of surface and fluvial flooding. *This represents modification type (3) in the PPG.*

5. Appendix

A copy of the Neighbourhood Plan Health Check undertaken in April 2024 is presented as a free-standing appendix to this Modifications Statement. The purpose of the Health Check was to identify (at the time of writing) which policies might be taken forward through the review of the Neighbourhood Plan, and how they might be updated. It also identified whether policies may be removed as well as possible new policy areas.

The recommendations of the Health Check were considered alongside wider consultation feedback and ongoing work on the Local Plan to help inform the draft revised Plan.



Neighbourhood Plan Review

Statement of significance of the modifications:
As updated for the submission version of the Plan following the
Regulation 14 consultation
June 2026



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