Title of Report:	**Direction of Travel Consultation**
Report to:	**Local Plan Sub Committee**
Date:	**11th March 2021**

Purpose of Report

1. This report provides a summary of responses and some early recommendations following the Regulation 18 Local Plan Direction of Travel Consultation.

Recommendations

The Local Plan Sub Committee is recommended:

a. To note the Regulation 18 Local Plan Direction of Travel consultation exercise including publicity that took place to engage with partners, stakeholders and communities;

b. To note the summary of responses to the consultation questions;

c. To agree the next steps in progressing the Local Plan; and

d. To thank all those who responded to the Regulation 18 Local Plan Direction of Travel consultation.

Reasons

2. In accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012, Wealden District Council (WDC) undertook a public consultation on the Regulation 18 Wealden Local Plan Direction of Travel document. The purpose of the consultation was to undertake early engagement with residents, businesses and other stakeholders to assist to inform the future vision for the district and the policy direction for the local plan. Under Regulation 18 (3) a local authority must take into account consultation responses received in preparing the local plan. This report demonstrates how we intend to take forward the outcome of the consultation in the plan making process.

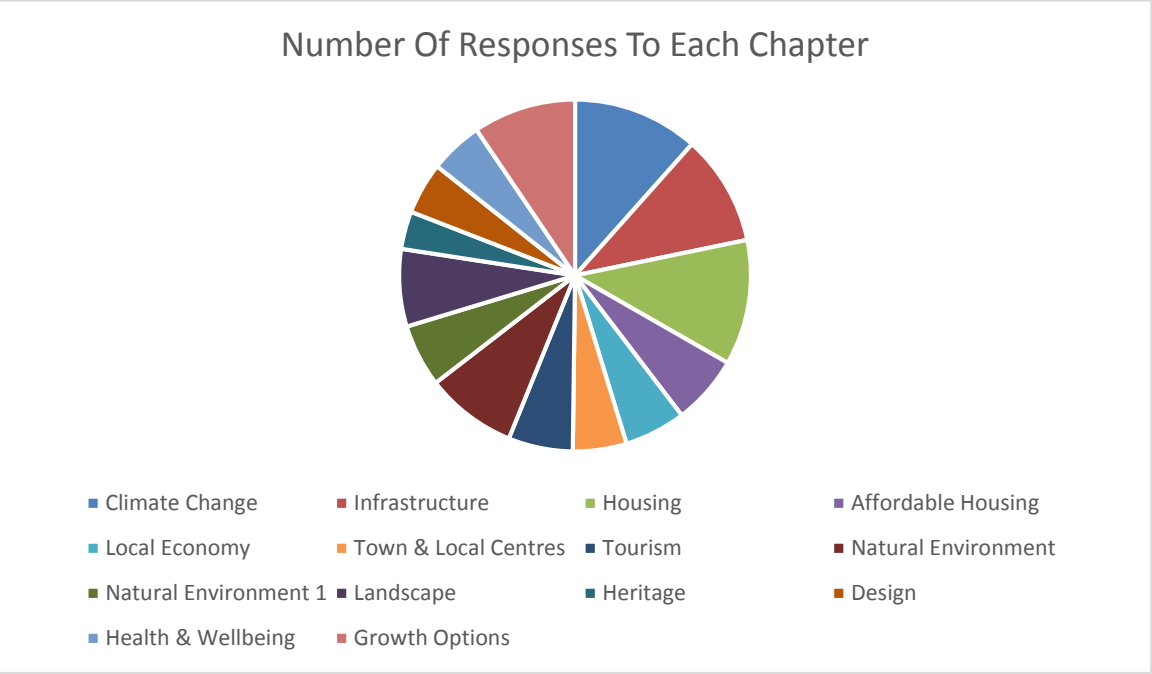
Introduction

3. The Wealden Local Plan Direction of Travel Consultation took place between 23rd November 2020 and 18th January 2021 and was published on the Council's website. Ahead of the consultation, we contacted all those on our consultation database (4704 individuals and organisations) by either email or letter. We also advertised the consultation using social media (Facebook and Twitter) and contacted 17,600 individuals / organisations via the Council's 'My Alerts' system. Guidance notes for responding to the consultation were provided and responses were invited to be submitted through the consultation portal, by email or post. We also invited comments by email or post on the Sustainability Appraisal Scoping Report and the Consultation and Engagement Strategy.

4. In response to the Direction of Travel consultation we received 1702 responses from 304 individuals / organisations. A breakdown of the responses on a per chapter basis is provided in table 1 below.

Table 1: Number of responses to each chapter

Chapter Number	Chapter Title	Question Number	Number Of Responses
4	Climate Change	1-5	197
5	Infrastructure	6-10	173
6	Housing	11-15	196
6	Affordable housing	16-20	108
7	Local Economy	21-25	96
8	Town & Local Centres	26-30	84
9	Tourism	31-35	101
10	Natural Environment	36-40	143
	“	41-45	98
11	Landscape	46-50	121
11	Heritage and Cultural Assets	51-55	59
12	Design	56-60	81
13	Health & Wellbeing	61-65	83
14	Growth Options	66-70	162



5. We received seven responses on the Sustainability Appraisal Scoping Report and one general comment on the Consultation and Engagement Strategy from the South Downs National Park Authority.
6. Responses received by email or by post were uploaded to the consultation system. This involves a high level review to consider which question the comment relates to where this is not made clear by the respondent.

7. Respondents included residents, businesses, landowners, developers, and organisations, Parish and Town Councils and Statutory Consultees. A full list of respondents is provided in appendix 1.

8. In total 97 respondents used our online consultation portal, 205 emailed and 2 sent their responses by post. Of those who emailed or sent their responses by post 121 were from residents, 19 were from Statutory Consultees, 23 were from Town and Parish Councils and 42 were from land agents or developers.

9. A number of respondents commented about the consultation portal itself. These related to the consultation system being difficult to use, that difficulties had been experienced when trying to register for the consultation or the system was not user friendly. Whilst this is disappointing, the Council had been clear that both written or email comments would be accepted. We will investigate further the user ability of our consultation system with the software provider ahead of our next consultation.

Wealden Local Plan Direction of Travel consultation

10. The Direction of Travel consultation report set out ten main themes that we consider important to address in the local plan. Each of these chapters presented a number of sections setting out what we already know, key issues and challenges, what we are already doing in regards to the topic area, further work we need to undertake and also a number of policy options. We then presented five questions. These questions asked if we had missed any issues and challenges, whether you agree or disagree with the policy options presented and whether we should consider other policy options. We also provided an opportunity to make additional comments on the particular topic / theme to ensure that respondents were able to add any further comments that they wished to make.

11. The last chapter in the consultation document set out four high-level growth options and their key implications and asked five questions to assist us in setting a long-term vision as well as assisting to identify the strategy for growth taking into account responses to the consultation.

Aim of this report

12. The below sections aim to provide a summary of the main issues raised for each question in the document. Due to the volume of responses received it is important to highlight that this report sets these out at a relatively high level only and seeks to confirm the general nature and type of comments that we received. We advise that for further detail that our consultation portal is used should readers wish to review the responses received in full. We have also set out in appendix 2 a summary of responses from local authority partners, statutory consultees and other relevant organisations. We have also provided the responses received from our Town and Parish Councils in appendix 3.

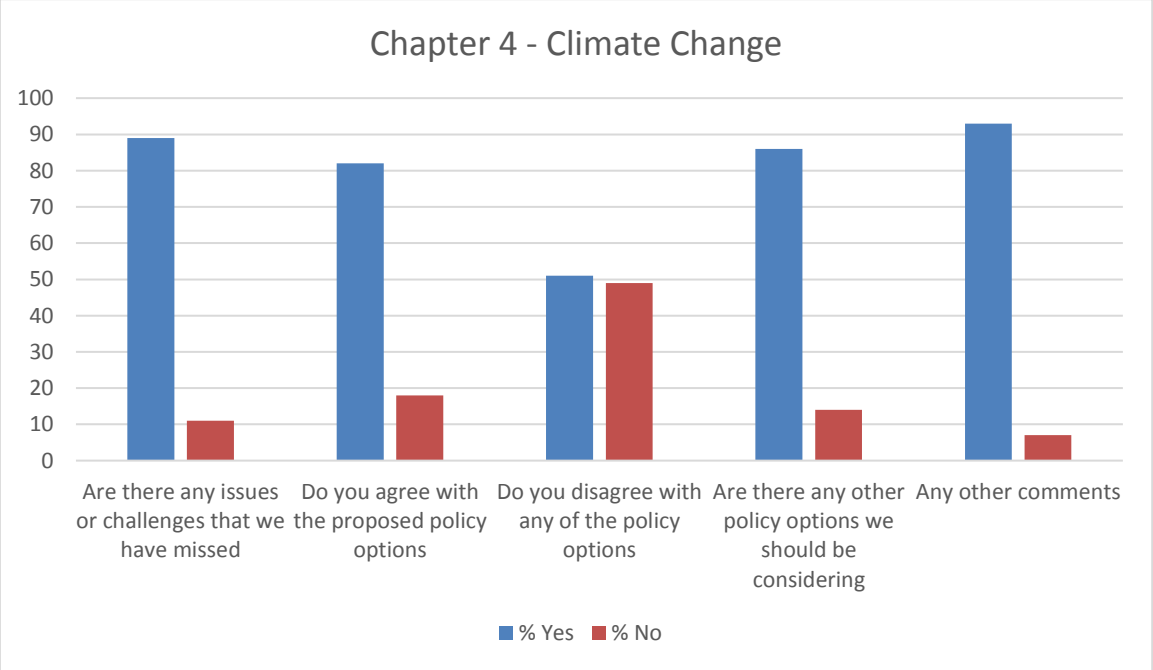
13. Many of the responses received including those from partners (as above) are detailed in nature and it is important that these are subject to more detailed analysis to fully inform the next steps in plan preparation. This is a much more time intensive process than providing this initial general identification of issues, as described in this report. The main aim of this report is to provide a high-level summary with the intent of drawing out the issues raised from the responses that we received and for these to then be considered further and as part of producing a Draft Local Plan for consultation under Regulation 18 in early 2022.

14. All consultation responses have been considered by officers and the following eleven sections provide a summary of the main issues raised for each question / theme presented in the Direction of Travel consultation document. As responses

could be made either online, by email or post, the responses have been collated and cross referenced to different themes as appropriate reflecting the topic raised in the response. All comments received on the Direction of Travel Consultation can be accessed in full via the consultation portal[1].

Chapter 4 – Tackling Climate Change, achieving carbon zero outputs and improving air quality

15. Climate change was presented as the first theme in the consultation document. This was noted and seen as a positive step by a number of respondents. The chapter set out a number of issues and challenges that we will need to consider as part of the local plan and growth strategy including air quality, public transport network, limited cycling and walking infrastructure and a reliance of the motorcar. We also identified the issues and challenges associated with flooding, water resources, and our natural environment as well as delivering a sustainable built environment. We also set out a number of policy options, as discussed below.



Question 1: Are there any issues or challenges that we have missed?

16. In total 98 respondents provided a response to this question, equating to just under a third of all respondents to the overall consultation. 89% of responses to the question considered that we had missed some issues and challenges and let us know what these are. 11% of responses considered we had covered the issues and challenges.

17. Of those respondents who answered 'yes' all provided additional information for us to consider. The responses either confirmed why it is important to consider the issues and challenges that we identified or suggested ways in which we should

[1] Consultation portal: https://consult.wealden.gov.uk/kse

consider the issues and challenges and take forward policy. The key areas covered by respondents in relation to issues and challenges included:

- Electric vehicles and the infrastructure required to support these;
- Public transport including: a lack of provision, a need to create reliable, regular and convenient services, opportunities for rail travel and reinstating closed railway lines and also introducing carbon zero public transport;
- Active travel in relation to: issues in promoting cycling and walking, infrastructure and issues to achieve this in the district's 'out of town' areas;
- New development in relation to: reducing commuting by collocating employment and housing, sustainable design including renewable energy measures and low carbon construction methods / techniques;
- Reducing CO2 emissions and setting carbon budgets and targets;
- Carbon sequestration and maximising opportunities provided by the natural environment including tree planting and environmental protection;
- Air quality including impacts on human health and the disparity between supporting additional road infrastructure, construction and the climate emergency;
- Renewable energy and ensuring this is used in new housing and employment development;
- Water resources including water efficiency in developments and the management of water storage;
- Flooding including the protection of floodplains, the use of SuDs and natural flood management including trees; and
- Natural Environment including opportunities to protect habitats, deliver a net gain in biodiversity and its use to address climate change.

<u>Question 2: Do you agree with the proposed policy options?</u>

18. In total 92 respondents answered this question. Of those who responded 75 (82%) agreed with the proposed policy options and 17 (19%) disagreed. 77 respondents provided further information to tell us which policy options they agreed with. Only one respondent disagreed with the climate emergency altogether and many respondents in their response agreed with the options and confirmed that we are taking the right approach.
19. Those who did not agree with the options mainly cited development feasibility; aspects of the options being outside of the Council's control / influence; policy options being too restrictive or not ambitious enough and the lack of commitment / enforceability.
20. Whether in support or not of the options presented, the responses emphasised the importance of ensuring measures are balanced in terms of financial viability; design impacts and intention, although the key message from the responses was that the Council should be ambitious in its approach to tackling climate change.
21. For policy option 1, there was general support for delivering energy efficiency. Respondents agreed that the policy options need to have greater emphasis on

alternative energy sources such as wind and solar and that the district need far more local wind, solar and energy harvesting and storage solutions.

22. For option 2, many respondents commented that all new builds whether residential or business premises should include grey water recycling, rain water harvesting, permeable surfaces and avoid removal of established trees.

23. For option 3, a few responses commented that we need more renewable energy developments and alternative energy sources.

24. There was particular support for policy option 4 in terms of investment in public and sustainable transport and making new developments walkable and well connected, to reduce the reliance on cars.

25. There was also support for option 5 in relation to encouraging ULEV network and infrastructure. However, respondents felt that we should go further on these including taking more proactive steps to reduce vehicle usage other than mainly relying on the conversion of more vehicles to electric and that encouraging active and sustainable transport within major new developments is not enough. It was considered that the policy objective here, should be to focus growth in sustainable locations with good transport networks (rail and road) to ensure that sustainable travel can be achieved between developments and towns.

26. For Option 6, which related to carbon sequestration respondents generally supported the option. One respondent did not want to see carbon sequestration to weaken a zero emission approach. Others commented on the benefits of carbon sequestration and a need to protect existing trees.

27. For Option 7, respondents generally agreed in relation to finding natural solutions for developments. Other comments were made in relation to SuDs including strategic SuDs, solutions to hold excess water, a request to consider water meadows at the River Cuckmere and the cumulative impact of developments on flooding.

28. For Option 8, one respondent suggested the scope should be widened to consider other possible sites should Arlington Reservoir prove insufficient or unfeasible. Issues around the subsequent traffic generation and parking was a concern, which will require appropriate management.

29. Not many comments were received in relation to option 9 parking standards. However, there were specific concerns raised around the general trend to reduce car parking spaces, especially in rural areas. It was also raised that rural areas are often too far from population centres for cycling or walking to be realistic options for regular travel. Meanwhile rural public transport services are being reduced with increasing prices and that current parking standards are wholly inappropriate.

30. Option 10 related to design taking into account climate change. This approach was overall supported.

31. Although not neatly placed under the ten policy options presented, many respondents identified the correlation between meeting climate change objectives and the location, scale and nature of future growth and how it will be important for the Council to deliver sustainable development to reduce movement through the provision of growth where access to services and employment can be achieved.

<u>Question 3: Do you disagree with any of the policy options?</u>

32. A total of 70 respondents answered this question and there was a relatively even split between those who said ‘yes’ (49%) and those who said ‘no’ (51%). Of those who answered ‘yes’ nearly all provided further information as to why they disagreed with a policy option(s).

33. The main reasons given for disagreeing with the policy options centred on there being too much emphasis on public transport when car dependency is likely to continue; the impracticality of walking and cycling for everyday purposes (i.e. food shopping); not enough emphasis on “getting things done” and a lack of detail within the options.

Question 4: Are there any other policy options we should be considering?

34. In total around a quarter (72) of respondents answered the question of which 86% considered that there were other policy options we should be considering. There was a particular focus in the following areas:

- Water resources and management including concern about the effectiveness and management of SuDs, a call for better water infrastructure and general support for water efficiency in new housing. Also, support and advice for assessing flood risk was offered.
- A number of respondents suggest that more growth will not support climate change objectives. Other respondents supported growth if growth is sustainably located with employment and services to reduce car reliance / travel. One respondent suggested that parking standards are too low and that these do not meet household need.
- There was much support for energy efficiency and carbon neutral developments including renewable energy, the provision of ULEV infrastructure and a call for a greater rollout across the district.
- There was also much support for better public transport including low emission transport to facilitate sustainable travel and to reduce car reliance. Also, support for better cycling and walking infrastructure including between settlements and services and facilities. One respondent considered that a clearer vision for cycling across the district is needed. There was also support for rail expansion within the district.
- Comments were received in relation to the natural environment and these centred around greater protection for habitats and trees, safeguarding of land for water storage and food production. Carbon sequestration also featured in comments where it was suggested that we should consider a policy to support carbon sequestration objectives.

35. Other suggestions received included better provision of high speed broadband to support homeworking, turning street lights off at night and that we should provide a policy to reduce ozone pollution across the district.

Question 5: Do you have any other comments in relation to how we can plan to combat climate change?

36. This question attracted a very high response rate where half (151) of all respondents who responded to the consultation took part in this question. 93% of respondents had additional comments. The vast majority of comments supported the drive to address climate change and many comments made were similar to those in earlier questions. However, many respondents considered that we should be doing more to address climate change and that the local plan provides an opportunity to deliver on this, including opportunities to plan differently than we have before. It was noted that the withdrawn Wealden Local Plan did not address climate change. Many comments expressed concern for growth and greenfield development and there was overall a general support for housing to be carbon neutral and energy efficiency standards. Other key comments included:

    - In relation to energy generation there was a comment whether the design guide will be updated to mandate zero carbon homes, a call for community projects for renewables and heating as well as considerations on development viability.
    - In relation to the climate emergency and 2050 target, there was a call to work with partners to achieve this as well as understand carbon sequestration capacity within the district.
    - Many respondents focused on the natural environment in relation to planting trees, farming and a move towards sustainable farming practices to protect carbon stores.
    - In relation to transport, there was significant support for better public transport provision and rail and there was also suggestions around a need to understand the impact of road expansions on climate change. A suggestion was also made that additional road space (A22 / A27) should be removed from the plan as this creates a reliance on cars.
    - The vast majority of respondents agreed that it is vital that new development is located with the aim of reducing the need for journeys by car, to meet the national and district Climate Emergency targets.

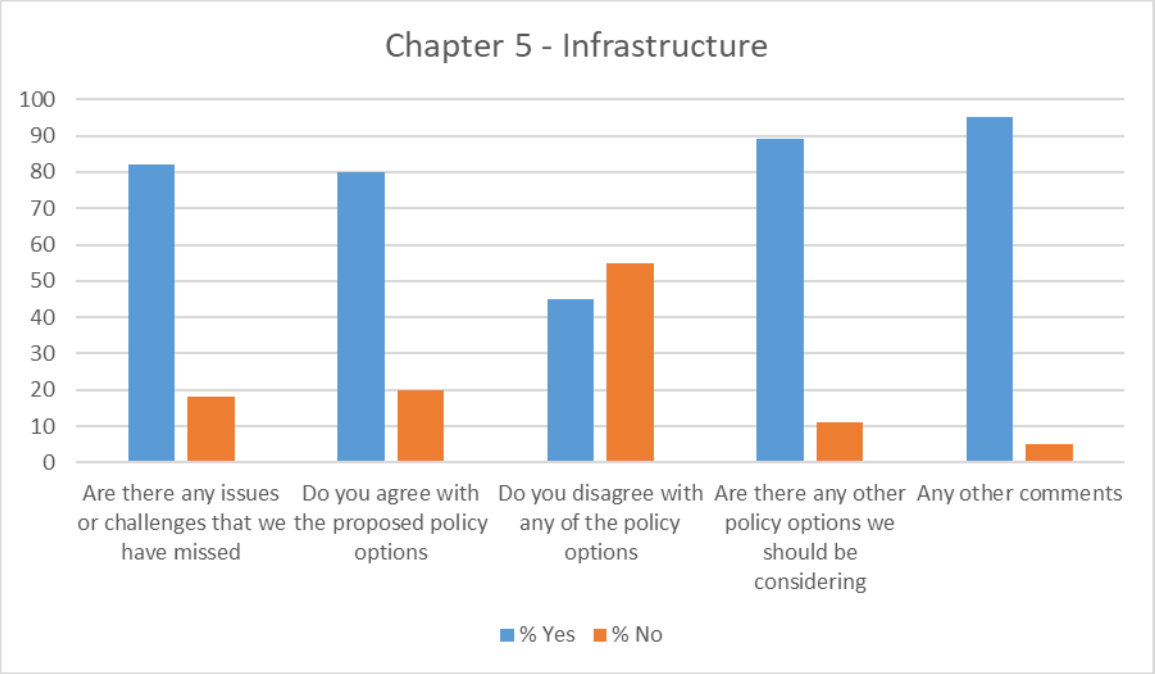
<u>Duty to Cooperate partners, statutory consultees and partner organisations</u>

37. The Climate Change chapter attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes District Council, Eastbourne Borough Council, Tunbridge Wells Borough Council, South Downs National Park Authority, Rother District Council, East Sussex County Council, Environment Agency, Natural England and South East Water.
38. Other partner organisations that responded were: Campaign to Protect Rural England (CPRE), Royal Society for the Protection of Birds (RSPB), Sussex Wildlife Trust (SWT), Rail Future, Crowborough Chamber of Commerce, Uckfield Chamber of Commerce, Board of Ashdown Conservators and the Sussex Ornithological Society (SOS).
39. In general, our approach to climate change was on the whole supported by partners. A number of suggestions were made which we will consider as part of the next steps in the panning process and we will discuss these with partners as appropriate.
40. A summary of all these responses is included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Strong support from neighbouring authorities on the need to address climate change and the policy options identified.
- Eastbourne BC supported a greater emphasis on reducing the need to travel and reliance of cars as a key objective of the Local Plan as well as emissions reduction rather than carbon offsetting.
- Tunbridge Wells BC stressed the need for climate change mitigation of smaller developments.
- South Downs National Park Authority highlighted the need to use tools such as landscape capacity to help determine the location and amount of future development.
- South Downs National Park Authority and East Sussex County Council suggested that policies should include nature based solutions for mitigating / adapting to climate change.
- Environment Agency supported the policy options and highlighted additional considerations on development and flood risk. They also provided guidance on what the Strategic Flood Risk Assessment should cover.
- Natural England stated that the Local Plan should develop mitigation and adaptation policies in the Local Plan to help with climate change adaptation of water dependant ecosystems. They provided details of what evidence Wealden should collect to support these policies and guidance on what approaches to consider.
- South East Water advocated for water efficiency measures in new developments (e.g. 110 litres/person/day),

Chapter 5 – Ensure that growth and change is supported by infrastructure delivery to meet the needs of our communities.

41. The Infrastructure chapter set out what we already know as a district in terms of our existing infrastructure and what sort of improvements are needed such as increased road capacity in certain locations. The chapter identified the key issues such as car dependency in a rural setting, the capacity of education to meet current and future needs as well as the capacity of GP surgeries. There have also been challenges within the district relating to the loss of community assets, such as individual village shops and public houses, to other uses. As a result of these challenges we provided a summary of policy options that we can consider taking forward in the local plan.



Question 6: Are there any issues or challenges that we have missed?

42. This question attracted a relatively high response rate of 82 respondents. Of those who responded to this question 67 respondents (82%) stated 'yes', in that some issues and challenges were missed in the consultation document. Key themes identified in the responses are set out as follows:

43. The key focus of comments related to infrastructure provision and the timing of infrastructure delivery. There was an overall consensus that infrastructure required to support development should be in place before development is completed. To achieve this it was suggested that upfront infrastructure delivery should be a condition or requirement of planning permission. Alternatively, that growth should be provided in locations that is already served by the required infrastructure or should be a key part of the design and delivery of the development. It was noted by respondents that a lack of infrastructure where it is needed also affects businesses and the creation of jobs. A number of respondents commented about infrastructure provision in relation to development that is either currently being built out or has recently been granted planning consent. In particular, this included development at East Hoathly and Uckfield.

44. Another key focus of comments related to Wealden District Council's reliance on partners to deliver infrastructure and services and that infrastructure improvements have failed to materialise. It was noted that East Sussex County Council are the delivery body and that it will be important for Wealden District Council to resolve infrastructure delivery issues through better partnership working with its infrastructure partners. In a similar vein, we also received comments relating to the use of developer contributions (Section 106 and CIL). There was a question about what the Council will do to improve the non-delivery of planning obligations. In addition, one respondent considered that we should make reference to emergency services as essential infrastructure and that planning obligations should be collected for service provision for newly developed communities.

45. We received a high number of comments to this question with a focus on sustainable travel. There was overall consensus that there is a need for improved connectivity through improving rail links and the bus network including supporting travel hubs and improving the coordination of bus and rail timetables. One comment was received asking the Council to reaffirm their commitment to restoring rail links and a number of comments considered that restoring rail links to be key to sustainable travel, linking the district with work and cultural destinations. A tram network to connect settlements was suggested as an alternative in the absence of rail network improvements. We received comments in relation to the off-line A27 in that this would not be justified in a climate emergency as well as building more homes not being sustainable for transport or sustainable energy use. One respondent suggested that transport policy should be split between urban and rural areas on the basis that forcing a model shift away from motor vehicles is inappropriate for rural areas, especially with an aging population.

46. Other comments focused on roads and footpaths. A number of respondents wished to see the provision and expansion of the foot and cycle path network to achieve better connectivity between towns and villages. Other comments considered that better investment in roads is needed, that the speed of traffic and better road safety is required. Another focus related to safer cycling and walking to assist with active and sustainable travel. It was also considered by the British Horse Society that active travel should include equestrians. Electric car charging in developments was also raised.

47. Other infrastructure items and matters were raised by respondents this included:

- That there is no long-term planning for the provision of GP practices;
- That there is limited police presence and police stations;
- There is a need to improve broadband and mobile coverage;
- That the provision of social care needs to be increased taking into account the district's aging population;
- There is a need to address sewage capacity and upgrading pipes;
- That development should provide better rainwater storage and recycling to mitigate water shortages; and
- A concern about drainage from developments into the Pevensey Levels.

48. A number of respondents commented on the Covid-19 pandemic in relation to not knowing whether the pandemic will change behaviour long-term in relation to travel patterns and transport requirements.

<u>Question 7: Do you agree with the proposed policy options?</u>

49. In response to this question we received a total of 75 comments. Of those who responded to this question, 60 respondents (80%) stated 'yes', they agreed with the policy options and provided us with detail as to which options they agreed with or additional comments.

- Policy option 1: This related to providing planning policies to create sustainable communities, reducing the need to travel by private motor vehicle and ensuring that the right infrastructure is provided at the appropriate time. This option did not receive many direct comments but many were generally supportive. A number of respondents commented on infrastructure deficits and non-delivery of infrastructure items and considered that infrastructure had not been delivered

at the right time in the past and that timely infrastructure provision needs to be considered to support any future development. It was considered by one respondent that policies are too reactive and that policies should be more radical and on a long-term strategic basis. A number of respondents considered that the plan should encourage infrastructure upfront so as not to overwhelm existing services and facilities and another respondent considered that there should be definite thresholds that will trigger requirements for services and infrastructure.

- Policy option 2: This related to promoting the use of sustainable transport modes (i.e. walking, cycling and public transport) and favouring future development in locations where existing sustainable transport routes are in place (or where this can be provided). This policy option attracted the most comments. The main focus of comments was in relation to bus services where there was an overall consensus that better and more frequent bus services are required, especially connecting housing with train stations. One respondent also commented that a commuter bus service should be considered and subsidised by developers and commuter buses should be linked to rail timetables and suitable parking should be provided. Other respondents considered the drawbacks of sustainable travel such as bad weather, a lack of bus shelters, cycling and walking not being suitable to get to work or to carry shopping. Comments were also received suggesting that major improvements to the public transportation network would be required to deliver this policy option. It was also commented that provision of cycling and walking infrastructure that is safe should be provided especially in rural areas.
- Policy option 3: This policy option related to directing new development allocations to sustainable locations and to be designed to support sustainable modes of transport, as well as provide suitable vehicular accesses and parking. This policy option also received a number of comments. The focus of these related to what is required to deliver this option. This included supporting more safe cycle routes, that more work should be undertaken to develop public transport, needing a joined up approach to district infrastructure planning and that town centres require transformation to support this through transport hubs. One respondent commented that infrastructure improvements have failed to materialise where this approach has been taken before and another respondent commented that sustainable modes of transport have always been an afterthought, rather than delivering this in a piecemeal fashion. A respondent also commented that sustainable travel modes need to be a practical alternative to car use in order for them to be successful.
- Policy option 4: This related to having planning policies that will support the provision of new social infrastructure where it is needed. We did not receive many comments on this option. However, one comment from a respondent from the development industry suggested that new development should be considered in a positive manner when considering impacts on social and community infrastructure.
- Policy options 5, 6 and 7: The comments received in relation to providing new education infrastructure, telecommunications infrastructure and new health infrastructure as relevant to policy options 5, 6 and 7 were all supportive and it was considered by all respondents that this infrastructure is much needed.
- Similarly, policy option 8 that related to resisting the loss of existing facilities such as pubs, village shops and community halls was also very much supported

from the comments received for both social reasons as well as to support the rural economy.

- Policy option 9: This policy option related to allocating sites for social and community uses to meet needs. We received comments supporting this policy and also one respondent suggested that in allocating sites and thinking about needs that we should consider this district wide in relation to how and where services should be provided. There was also an emphasis in relation to needing to expand the level of services and support in rural areas.
- Policy option 10: This policy option was about considering the impacts of large new developments and the impact they have on social and community infrastructure. Although comments were supportive, the responses mainly focused on the impacts element of the policy where respondents considered that funding mechanisms and infrastructure provision is problematic due to this following development rather than preceding it. One respondent considered that social infrastructure should include farm shops.
- Policy option 11: This option related to reviewing the CIL Charging Schedule alongside the plan to ensure that development is making an appropriate contribution to infrastructure provision. Respondents from the developer industry mainly commented on this option. From the comments received, there was a general consensus that reviewing the CIL Charging Schedule will assist to provide clarity over the infrastructure that is required, however, it should seek to avoid complexities between CIL and S106 payments.
- Policy 12 related to progressing an overall assessment of the financial viability of new development contained within the local plan to support the review of the CIL charging schedule. Limited comments were received on this option, however, respondents from the developer industry noted that frontloading developer contributions is a financial burden on developers.

Question 8: Do you disagree with any of the policy options?

50. In response to this question we received a total of 64 comments, of which 29 respondents (45%) said that they disagreed with our options. In the comments received some respondents disagreed whilst others wished to provide some further detail where they would like to see a policy expanded or the policy to have more prominence. The key areas of focus were similar to the previous question and are summarised below:

    - Policy option 1: We received a number of comments in relation to the timing and delivery of infrastructure in that there is a deficit of funds to deliver infrastructure as well as insufficient infrastructure and services. Similar to question seven, a number of respondents commented on a need for infrastructure to be delivered first so that existing infrastructure and services do not become overstretched.
    - Policy option 2 and 3: In relation to promoting the use of and supporting sustainable transport comments generally focused on the issues. This included the district being poorly served by public transport, there is generally a reduction of rural bus services and walking and cycling are not viable options in rural areas. One respondent added that sustainable travel should be a priority and another that the Council should not rely on policies that they cannot enforce.

- Policy option 4: The provision of new social infrastructure did not receive many comments. However, respondents from the development industry commented on the benefits of development to provide funding either through CIL / S106, increased expenditure from new housing developments and income from Council tax and the New Homes Bonus which provide significant economic benefits to deliver this.
- Policy option 5 and 7: These options related to the provision of healthcare and new education infrastructure. Again there was a comment that this should be agreed and provided before development is occupied to reduce pressure on existing services. We also received a comment relating to underinvestment for healthcare and education in rural areas.
- Policy option 6: A couple of comments were received in relation to telecommunications infrastructure. The focus of these was on the importance of having good telecommunications for residents and this will only escalate in importance for residents. It was also considered that better mobile and broadband services would improve the attractiveness of the area and would seek to reduce car reliance in relation to economic factors.
- Policy option 11: In relation to reviewing the CIL charging schedule one respondent considered that CIL is an ineffective tool to meet community needs. Other comments were received from respondents in the development industry who considered this important in relation to the effects that development costs have on the deliverability of schemes and especially if other initiatives suggested in the consultation are implemented. The upfront requirement to pay CIL was also commented upon in relation to the difficulty this causes to the financing of larger sites when there are significant upfront costs such as groundwork and initial on-site infrastructure.

51. A number of other comments were also received this included comments from a respondent who would like to see infrastructure directed to local communities rather than a strategic district wide approach, such as improvements to the A22. Another respondent commented that we must ensure that the options become more than recommendations in practice and that they should be elements of future development that are set in stone from now onwards.

Question 9: Are there any other policy options we should be considering?

52. We received 80 responses to this question of which 71 respondents (89%) considered that there are other policy options we should be considering. The policy options put forward included:

- To consider where existing low carbon transport facilities, potential upgrades and new facilities can contribute to the zero carbon agenda and make sure major development is located to take advantage of these hubs;
- To put in place mechanisms to ensure that developers deliver infrastructure in a timely manner;
- For sustainable transport to support / include electric train transport;
- To provide a greater emphasis upon coordination of sustainable transport modes in relation to timetables and routes;
- To reappraise utility provision including sewerage and drainage systems, water storage and treatment, power cables, gas supply network and broadband and mobile coverage and to provide a utilities policy in the plan;

- To deliver new medical centres and surgeries;
- To provide community friendly meeting space in High Streets;
- To work with the Highways Authority to improve road infrastructure and make roads safer;
- To provide a policy to install more pavements in rural areas to improve safety and connectivity to towns;
- To increase parking provision in developments;
- To ensure that new developments provide adequate access for emergency services;
- To provide policies that support electric car charging points;
- Consider travel hubs, where people can connect to frequent bus services and then trains;
- For planning to account for all sections of the community including those who do not have access to transport, those who have reduced mobility or small children; and
- A policy to support the provision of community and / or emergency services infrastructure where this is needed.

Question 10: Do you have any other comments in relation to how we can support the delivery of infrastructure within Wealden?

53. This question attracted a high response where 122 respondents said they had additional comments, of which 115 respondents provided further comments. The majority of comments covered similar themes to those set out under previous questions.

54. The vast majority of comments that we received on this question related to an infrastructure shortfall. Many respondents considered that a hold should be put on any future development until adequate infrastructure is in place. It was considered by a number of respondents that providing infrastructure before development would ensure that existing services (schools and medical facilities) are not overburdened. In relation to schools, one respondent considered that these should be accessible by foot to reduce car travel. Overall, there was genuine concern in relation to the capacity of infrastructure in general to take more development.

55. A number of comments were received from the development industry in relation to infrastructure provision. These general set out that development should be supported to fund infrastructure to facilitate sustainable growth. One developer suggested that a new approach and partnership working with infrastructure providers is required to deliver this. Respondents from the development industry also discussed viability, updating the CIL charging schedule alongside the local plan as well as for the Council to publish infrastructure aspirations in the annual Infrastructure Funding Statement.

56. Similar to the first point above, a number of comments focused on roads, with many expressing concern about the capacity of the roads to take additional growth in the district. Comments related mainly to the A22, however there was also concern about the A27 including the current upgrades and it not being considered that the upgrades will resolve the issues. One respondent considered that a more joined up approach to upgrades and mitigation is needed between partners. In relation to solving these issues a number of comments were made including minimising the traffic generating effects of future development, improving traffic flow and capacity, locating growth in the most sustainable locations to reduce travel including locating

growth where there is good public transport provision to reduce traffic impacts. A respondent also commented in relation to the need for an off-line A27 to deliver growth.

57. Similar to other questions, a large number of respondents commented on public transport and cycling and walking. This included improving / restoring rail connectivity across the district or locating growth to support the delivery of this, better public transport including more bus routes at a greater frequency to connect towns and villages, better coordination between different sustainable transport modes i.e. bus and rail. A suggestion was made that Hailsham would benefit by a fast / more direct bus service to Eastbourne. In relation to cycling and walking, safety was raised and one respondent commented that the A22 is not a route suitable for walkers or cyclists. Other comments suggested that new development and paths should be integrated into the existing Right of Way network and that cycle lanes could be shared with other user groups.

58. Broadband and mobile phone coverage was also a common theme in the responses.

<u>Duty to Cooperate partners, statutory consultees and partner organisations</u>

59. The Infrastructure chapter attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes District Council, Mid Sussex District Council, Tunbridge Wells Borough Council, Rother District Council, East Sussex County Council, National Grid, Network Rail, Environment Agency, Natural England, South East Water, Southern Water and Historic England.

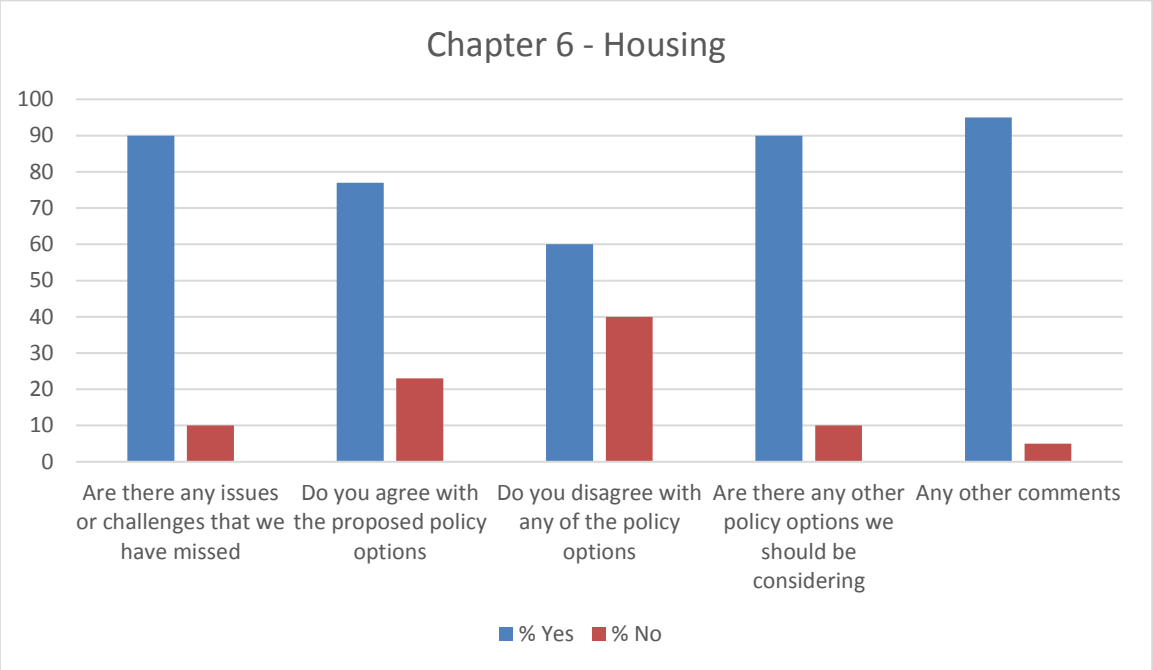
60. Other partner organisations that responded were: CPRE, Sussex Wildlife Trust, Rail Future, Crowborough Chamber of Commerce, Uckfield Chamber of Commerce, Board of Ashdown Conservators and the Sussex Ornithological Society.

61. A summary of these responses are included at Appendix 2, however in brief the focus of comments received included:

- Support from neighbouring authorities for collaboration on cross boundary infrastructure requirements.
- The need for infrastructure to be planned for and delivered on time in order to support growth and reduce pressure on existing infrastructure.
- Road and junction capacity noted as a fundamental consideration when exploring housing growth.
- Refinement of policy options suggested to include allocation of infrastructure on large development sites and to recognise that infrastructure provision can help enhance a place's sustainability.
- The importance of aligning the Local Plan and ESCC's Transport Plan 4 to deliver key shared objectives.
- National Grid highlighted transmission lines that run across the District.
- National Rail outlined their key objectives. They requested continued safeguarding of Uckfield to Lewes route and noted that proposed growth options may strengthen the case for re-opening the line.

Chapter 6 – Deliver the right type of homes, in the right location and to a high standard to meet local need.

62. This chapter was set out in two parts. The first part considered housing needs and delivery and the options to support the delivery of new homes within district and the second section discussed affordable housing, this is considered in the next section. The first part of the chapter provides baseline data that Wealden holds for housing, including housing delivery over time, the latest characteristics of the housing stock within the district, as well as issues surrounding population growth. The chapter then sets out a number of key issues and challenges for housing that includes the district's housing need using the Government's standard methodology calculation, the economic uncertainty resulting from the Covid-19 pandemic and EU transition, as well as the challenge of delivering the right size, type and tenure of homes within the district. We also considered the issue of older persons housing and those with disabilities. Ten policy options were provided at the end of the section.



Question 11: Are there any issues or challenges that we have missed?

63. In total 88 respondents provided a response to this question, equating to over a quarter of all respondents to the overall consultation. 90% of responses to the question considered that we had missed some issues and challenges. The majority of the responses received were concerned with the challenge of delivering housing growth, including the protection of our designated and non-designated landscapes, national and international biodiversity sites as well as the rural nature of the district. The key areas covered by respondents in relation to issues and challenges included:

- The majority of respondents wished for the Council to push back on the government's 'standard methodology' for calculating on housing need of 1,225 dwellings per annum (dpa) given the substantial constraints within the district.

- Many respondents commented on the high number of unbuilt planning permissions within the district and that we should support measures to ensure the delivery of housing sites with planning permission.
- It was suggested by some respondents that we should not continue to deliver the majority of new homes on periphery of existing 'sustainable' towns, given the issues with transport infrastructure, the pressure on GP surgeries, schools and a limited town centre offer.
- There is a statutory duty to enhance and conserve the High Weald Area of Outstanding Natural Beauty (AONB) and some respondents suggested that this had been overlooked in the consultation document and that it would be difficult to achieve the delivery of our housing need target given this constraint.
- There were substantial concerns regarding the size of new homes being built in the district (particularly four or five bedroom family homes) currently and that there is a requirement for smaller, more affordable homes.
- In relation to the types of new homes built, it was considered by many that the focus should be on an ageing community who require homes to enable them to downsize as well as to provide homes for those, especially young people, wishing to get on the property ladder.
- There was concern over the design of new homes and some respondents suggested that new housing developments should incorporate private amenity space and building standards designed to combat climate change (i.e. water efficiency and sustainable construction methods).

Question 12: Do you agree with the proposed policy options?

64. In total 82 respondents answered the question that equates to over a quarter of all respondents to the overall consultation. Of those who responded 63 (77%) agreed with the proposed policy options. Most of the respondents commented on policy options 1, 6, and 7, whilst there was very limited comments relating to policy options 3 and 10.

65. Policy option 1 related to the provision of a clear strategy to bring sufficient land forward to meet our housing need target, taking into account land constraints and limitations. There were mixed views on this issue, but it was clear that many respondents wished for the Council to push back on the Government's 'standard methodology' for calculating housing need and the High Weald AONB should be taken into account prior to agreeing the amount of housing to be delivered in the Local Plan. Conversely, some respondents considered that the housing need figure provided through the Government's 'standard method' is the minimum housing need figure and that the unmet housing needs of neighbouring local authorities should also be considered.

66. Policy option 2 related to delivering a mixture of housing sites, including those from small-to-medium sized house builders. This option was largely supported by respondents to the consultation, albeit that there were limited responses received on this policy option. Some respondents considered that large-scale development should not be allocated on the edge of smaller villages given that this could detrimentally affect their character.

67. There were limited responses to policy option 3 that relates to providing housing requirements for designated neighbourhood areas, but this was supported where considered.

68. Policy option 4 related to the delivery of a range of housing to meet the needs of an ageing community, including specialist accommodation and accessible and/or adaptable homes. There was genuine support for this option in relation to meeting the needs of different groups. It was also suggested that more emphasis should be placed on older people downsizing, freeing up homes for younger families and that retirement villages should also be considered in this context. A number of respondents supported accessible/adaptable homes standards in principle, but that this should be subject to a financial viability assessment.

69. Policy option 5 related to supporting self-build and custom build homes, as well as community-led housing and build to rent. There was support in principle for this policy option, but several respondents suggested that the wording should be reinforced to ensure that such developments come to fruition through the Local Plan.

70. Policy option 6 related to maximising opportunities on brownfield sites, particularly within existing towns and villages. There was unanimous support for maximising opportunities on brownfield sites, but there were some respondents who suggested that there needed to be flexibility in any housing density policy, in order to reflect the local area's characteristics. It was stated that local densities would vary from settlement to settlement.

71. Policy option 7 supported the right types, sizes and tenures of housing within the district to meet the community's needs. The majority of respondents stated that the Council should prioritise the delivery of smaller homes, including flatted development where appropriate. It was felt that Wealden had not in the past delivered the right size of homes and has instead delivered large, executive style homes that are not affordable for local people.

72. Policy option 8 was supported in principle, particularly relating to adaptable homes that were considered sensible, as they provided opportunities for older residents to continue to live in their homes, which was inherently more flexible.

73. Policy option 9 relates to providing appropriate planning policies for the conversion of rural buildings for housing and the development of single dwellings in the countryside. There was a mixed response to agricultural building conversions, with some respondents suggesting that new homes of this nature should be supported in the countryside, whilst others stating that there should be sufficient measures in place to refuse inappropriate conversions.

74. Lastly, policy option 10 related to our proposed approach to meeting the accommodation needs of gypsies, travellers and travelling showpeople. There was only a single response on this topic and this response supported the approach.

<u>Question 13 – Do you disagree with any of the policy options?</u>

75. In total, 71 respondents provided a response to this question, equating to just under a quarter of all respondents to the overall consultation. 61% (43 respondents) of those who responded to the question said they disagreed with the policy options presented. Specific policy options that respondents disagreed with were options 1 and 9. Comments were also received that related to options 4 and 8.

76. Policy option 1 related to the provision of a clear strategy to bring sufficient land forward to meet our housing target, taking into account land constraints and limitations. It was suggested that the national algorithm for assessing housing needs in Wealden was too high and that there were a number of constraints that would constrain housing development, namely the High Weald AONB and infrastructure. There were other respondents who suggested that housing need should only relate to the local community and that Wealden could not meet the unmet needs of other local authorities.
77. Policy option 4 related to the delivery of a range of housing to meet the needs of an ageing community. It was suggested that the policy option missed the benefits of retirement villages and park homes, by not including them on the list of specialist accommodation for older persons.
78. Policy option 8 related in part to ensuring that appropriate space standards could be in place as part of a new local plan. It was stated that there is no ability for a local authority to set their own space standards, and if standards are to be applied they must be in line with the Nationally Described Space Standards and would need to be appropriately evidenced in terms of need.
79. Policy option 9 related to providing appropriate planning policies for the conversion of rural buildings for housing. It was suggested that the conversion of agricultural buildings to residential development should be accepted in principle, as this would alleviate pressure on building new housing in rural locations.

Question 14 – Are there any other policy options we should be considering?

80. In total, 90 respondents provided a response to this question of which 90% (81 respondents) of respondents said there are other policy options the Council should be considering and detailed what these were. The policy options put forward are summarised below:

- There is a need for planning policies that provide genuinely smaller homes within major development schemes;
- The allocation of new housing with town centres in order to support businesses and footfall within Wealden's High Streets;
- To provide policies that prioritise brownfield development over greenfield development;
- To provide policies that support and provide self-build and custom build homes within Wealden;
- To provide policies that support Community Land Trusts in order to build good quality local homes;
- To provide more homes than the minimum requirement under the 'standard methodology' calculation and to meet the unmet housing needs of neighbouring local authorities;
- To ensure that new housing developments do not alter the character of existing settlements, particularly smaller villages, across Wealden;
- To provide policies that support the strategic provision of multifunctional green spaces and access to existing green spaces as part of new housing development;

- To provide policies to ensure that Wealden delivers new older persons accommodation of all types, to meet the needs of the community, including bungalows, retirement villages and park homes;
- To provide policies that deliver affordable homes within Wealden's towns and villages;
- To provide policies that bring back empty homes into the housing market; and
- To provide policies that ensure that new housing development incorporates sustainable construction methods and climate change mitigation measures.

Question 15 - Do you have any other comments in relation to how we can plan to deliver housing, including the range, type, size and tenure?

81. This question attracted a very high response rate where just under half (135) of all respondents who responded to the consultation took part in this question. 95% of respondents had additional comments. The key areas covered by respondents included:
    - The housing needs of those people who are working from home due to the Covid-19 pandemic and beyond, given that this will likely be a new way of working in the future. This could include broadband connection, private amenity space and access to green spaces;
    - To ensure that the right mix of homes is delivered within the district to support first time buyers, families wishing to remain in villages and those older people wishing to downsize;
    - That support should be given towards alternative methods of providing new housing such as self-build and custom build homes and community led housing;
    - That new housing development should avoid key landscape designations such as the High Weald AONB and South Downs National Park, as well as protected biodiversity sites such as the Ashdown Forest;
    - That new housing development should be accompanied by the right infrastructure at the right time, particularly for transport, education and GPs amongst others; and
    - There was a general consensus that new homes have not been built to a high enough standard in the past in terms of climate change mitigation, parking, road widths, design and a lack of private amenity or access to public open space. It was suggested that this should be addressed through the provision of policies in the new local plan.

Duty to Cooperate partners, statutory consultees and partner organisations

82. The Housing chapter attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes District Council, Eastbourne Borough Council, Mid Sussex District Council, Rother District Council, East Sussex County Council, Environment Agency, Natural England and Historic England.

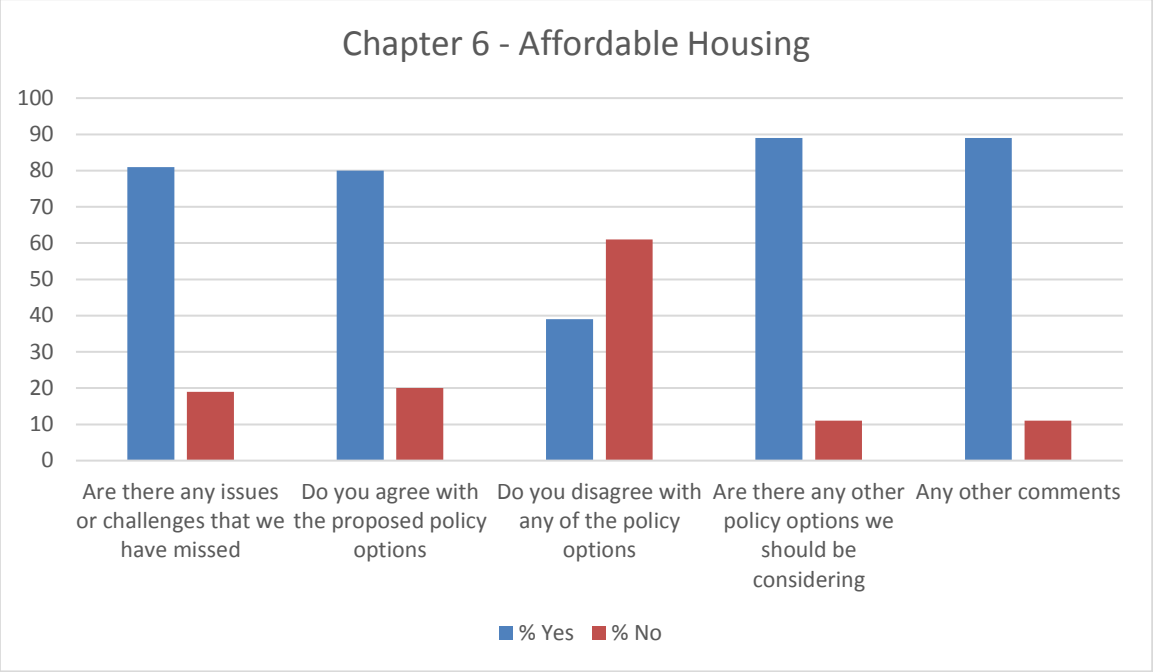
83. Other partner organisations that responded were; CPRE, RSPB, Sussex Wildlife Trust, Rail Future, Crowborough Chamber of Commerce, Uckfield Chamber of Commerce and the Board of Ashdown Forest Conservators.

84. A summary of all these responses are included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Lewes DC supported Wealden identifying sufficient land to meet our housing target and notified us that they were working with partners in relation to unmet housing need.
- Eastbourne BC notified Wealden that they were unable to meet their housing need target of 685 but made clear that the exact amount that cannot be met it not known yet. They welcomed joint working with Wealden on evidence bases.
- Mid Sussex DC welcomed the approach to meet our housing and gypsy and traveller accommodation needs.
- Rother DC suggested that Wealden may wish to look at additional sites across the District to demonstrate efforts to maximise supply. For rural housing, they suggest careful consideration of the scale of development, particularly in the High Weald AONB.
- ESCC highlighted the need to provide accessible new homes to meet the needs of those with physical or mental disabilities. They suggested a culture strategy if new settlements are taken forward and further analysis of the requirements to accommodate increased home working in new housing design.
- Environment Agency made clear new development should be directed to areas of low flood risk and supported Wealden's focus on brownfield delivery.
- Natural England stated that housing provision should maximise opportunities to contribute to multifunctional networks of green infrastructure and spaces for people and wildlife.
- Historic England highlighted that delivering new homes could encourage the appropriate adaptive reuse of historic buildings for residential purposes in urban as well as rural locations.

Chapter 6 Continued - Affordable Housing Needs and Delivery

85. The second part of the housing chapter considered affordable housing within the district. Affordable housing need refers to households who lack their own housing or are living in unsuitable housing and cannot afford to meet their needs in the private housing market. The chapter provided background information regarding affordable housing as well as a number of issues and challenges including the affordability of housing, the high demand for affordable housing within the district, ways of increasing affordable housing delivery and ensuring it remains financially viable to deliver. The chapter then provided a number of policy options and next steps that could be undertaken to improve the provision of affordable housing across the district.



Question 16 - Are there any issues or challenges that we have missed?

86. In total 53 respondents provided a response to this question, equating to just under a fifth of all respondents to the overall consultation. 81% of responses to the question considered that we had missed some issues and challenges. The majority of the responses received were concerned with the challenge of delivering new affordable homes and whether such new homes are truly affordable and in the right locations (i.e. coexisting with infrastructure, shopping facilities, schools, GPs and other services. The key issues and challenges raised are summarised below:

- The vast majority of respondents were concerned with the delivery of affordable housing in the district and whether young, single and older persons could genuinely afford such accommodation. There were several comments that suggested that this was particularly troubling in the north of the district, where younger students/ apprentices in rural employment could not find appropriate accommodation. It was stated that previous delivery of affordable homes in the district was not sufficient and this should be increased substantially.
- A number of respondents felt that new affordable homes should be co-located near to infrastructure and where there are good transport links, local shops, medical facilities and schools.
- It was suggested that Community Led Housing schemes could be a significant provider of affordable housing, particularly in rural areas.
- Respondents from the development industry suggested that there should be flexibility incorporated into any policy on affordable housing based on viability, especially on smaller sites.
- There were several respondents who suggested that the Council should increase the volume of affordable homes through Sussex Weald Homes that was strongly supported.

Question 17 – Do you agree with the proposed policy options?

87. In total 50 respondents answered the question that equates to around a sixth of all respondents to the overall consultation. Of those who responded 40 (80%) agreed with the proposed policy options. There was broad support for the four proposed policy options that were presented in the affordable housing chapter, subject to several caveats.

88. Policy option 1 related to the provision of a minimum threshold for affordable housing provision for all major housing development sites. There was broad support for this option subject to viability testing and flexibility being incorporated into the policy. It was suggested that the Government's White Paper may increase this minimum threshold further and this should be kept in mind.

89. Policy option 2 related to establishing clear priorities for genuinely affordable family homes for rent or homeownership, including percentages for the types of affordable housing tenures. Again, there was broad support for this option subject to viability testing and flexibility being incorporated into the policy. Several respondents also considered that policies should seek to deliver smaller affordable homes also.

90. Policy option 3 related to setting out a clear planning policy for off-site affordable housing contributions where this may be appropriate. This was supported by respondents from the development industry and was seen as an alternative way of providing affordable housing contributions where this cannot practically be delivered on site, particularly on small sites in rural areas.

91. Lastly, option 4 related to rural exception sites and having a clear planning policy to support such opportunities to meet identified local needs, including allowing some market homes to help facilitate provision. This option was broadly supported in principle. There was some concern that substantial affordable housing should not be delivered within the High Weald AONB owing to this landscape constraint, but small scale development of this nature should be supported.

Question 18 – Do you disagree with any of the options?

92. In total, 36 respondents provided a response to this question. 39% (14 respondents) of those who responded said they disagreed with the policy options presented. Specific policy options that respondents disagreed with were options 1 and 4.

93. Policy option 1 related to the provision of a minimum threshold for affordable housing provision for all major housing development sites. There were a few respondents who suggested that a 'standard' percentage used for all affordable housing in new developments should not be pursued and that different levels of affordable housing should be used in different geographical areas.

94. Policy option 4 related to having clear planning policies to support opportunities to meet identified local needs through rural exception sites. It was suggested that the rural exception sites should be clearly defined, particularly in terms of scale within the High Weald AONB, taking into account national policy.

Question 19 - Are there any other policy options we should be considering?

95. In total, 56 respondents provided a response to this question of which 89% of responses to the question said there are other policy options the Council should be considering. The policy options put forward are summarised below:

- To provide policies that would prevent developers from splitting sites into discrete sections that are predominately market housing or affordable housing. The respondents generally preferred schemes that include pepper potting across the site (i.e. market and affordable housing mixed together on site);
- To provide an evidence base and policies that will increase the proportion of affordable housing on site from 35% to 40% or even higher;
- The Council should seek to confirm a policy requirement for affordable market purchase as an additional affordable product (to require 10% of homes on major development sites to be affordable homeownership);
- To provide policies for delivering 'First Homes' that should be incorporated into the Local Plan following national planning policy changes;
- To provide a planning policy where local affordable housing needs are met first;
- To provide a policy that places emphasis on the provision of Community Land Trusts and their contribution to affordable housing;
- To consider a policy option to allocate brownfield land in existing town centres for smaller, affordable homes; and
- To ensure that infrastructure, employment, retail, schools and GPs are collocated with new affordable housing provision.

<u>Question 20 - Do you have any other comments in relation to how we can plan to deliver affordable housing, including the range, type and tenure?</u>

96. In total, 72 respondents provided a response to this question, equating to just under a quarter of all respondents to the overall consultation. 89% of respondents made suggestions on how the Council could plan to deliver affordable housing, including range, type and tenure. The key areas covered by respondents included:

- The vast majority of respondents considered that new affordable housing is required at a significant scale, including small-scale development within the High Weald AONB to address affordability issues.
- There was general consensus that Wealden's local communities need more affordable housing and specifically for the young, single people or downsizers. It was considered that such affordable housing should only have 1 to 3 bedrooms and be substantially below market values for both sale and rent.
- It was noted by respondents in the development industry that the Council must undertake a whole plan viability study to ensure that the delivery of affordable homes is viable and that affordable housing policies are flexible to allow for site-specific circumstances.

Duty to Cooperate partners, statutory consultees and partner organisations

97. The affordable housing chapter attracted responses from two Duty to Co-operate and statutory consultees: Lewes District Council and Rother District Council.

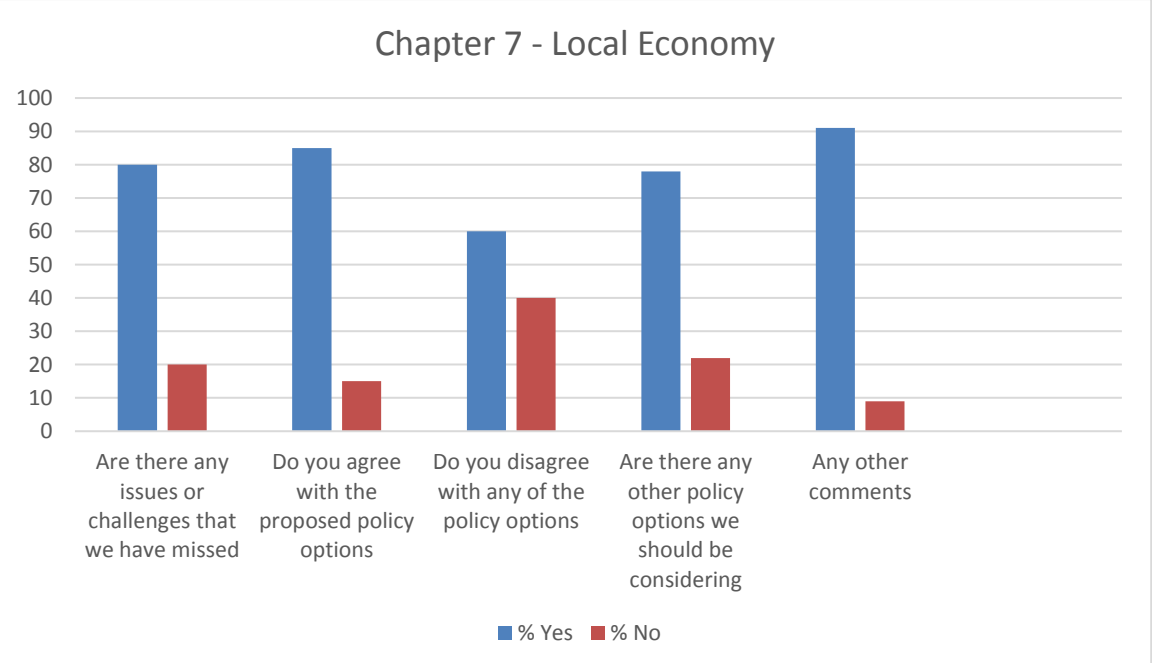
98. Other partner organisations that responded were; Sussex Wildlife Trust, CPRE, Crowborough Chamber of Commerce, Uckfield Chamber of Commerce and the Sussex Ornithological Society.

99. A summary of all these responses are included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Lewes District Council supported the options outlined.
- Rother District Council highlighted the variation in viability between rural and urban locations and the difficulty this creates in setting an affordable housing policy (e.g. setting a district wide target or a more nuanced area based approach).

Chapter 7 – Support local businesses, increase jobs and ensure a thriving, diverse and a locally sustainable economy.

100. The Economy chapter explained that Wealden has a diverse economy and considered a number of issues and challenges that we will need to consider and address. The issues and challenges included the impact of the EU transition, the Covid 19 pandemic and Government changes to the planning system. We also considered issues surrounding wages, skills and jobs as well as identifying issues and opportunities for economic growth including suitable employment premises and office workspace and encouraging particular emerging sectors including supporting business start-ups. We also acknowledged the important role of agriculture, the rural economy and tourism. We identified 11 policy options and sought views on these.



Question 21: Are there any issues or challenges that we have missed?

101. This question attracted a relatively low response rate (50 respondents). Of those who responded to this question, 80% (40 respondents) stated 'yes', in that some issues and challenges were missed in the consultation document.

102. The key areas where respondents considered we had missed issues and challenges included:

- Climate change: This was discussed by a number of respondents who raised the importance of considering climate change and sustainability when planning for the economy including opportunities for renewables, green space, biodiversity and tree planting to be incorporated in new business developments. Other comments made related to job and economic opportunities that relate to the environment, biodiversity and climate change. A number of respondents also raised the importance of co-locating employment opportunities with housing development to reduce travel and to assist in meeting the climate emergency agenda.
- Agriculture, the rural economy and tourism: A number of respondents commented on the rural nature of the district, the importance of agriculture, forestry and farming in relation to the services it provides and its contribution to the provision of jobs and the district's economy. The importance of tourism was also raised including supporting businesses in the AONB and rural areas in general. Opportunities relating to rural diversification was also mentioned in relation to changing working practices.
- Housing and employment growth: A number of respondents commented in relation to the need to balance both housing and employment growth and identifying sufficient land for employment provision. Other respondents commented that floor space requirements should be carefully considered, so as to not result in vacant employment space. Several respondents considered that mixed-use-developments are the way forward to provide an improved relationship between home and different types of workspaces, the provision of local jobs, as well as to resolve out commuting.
- Education, skills and wages: The relationship between jobs, skills and education was raised by a number of respondents, including a need to attract a higher skilled workforce and larger businesses to the district, a need to support retraining / upskilling, as well as providing higher education and research facilities in the district. It was noted by one respondent that the sectors prevalent in Wealden are lower paid roles than those attracting out commuting. Along similar lines, comments were also received in relation to providing more business opportunities for younger people to resolve migration in the 16-24 age group.
- Future requirements for employment: A number of respondents commented about the need for office space and whether as much office space would be needed in the future. Comments focused on homeworking for certain businesses or providing workspace hubs for meetings, live/work units and workshops more locally. A number of respondents also commented on the impact of the Covid-19 pandemic on jobs and the future need and nature of business premises in the future.
- Infrastructure: A number of comments were made in relation to issues and challenges surrounding infrastructure. Comments ranged from the need for

suitable broadband and mobile coverage to support businesses as well as the district's roads and road network affecting current businesses as well as attracting new businesses to the area. Public transport and sustainable transport were also identified as an issue in relation to providing genuine travel to work choices as well as linking housing development to the main employment centres within the district and beyond.

Question 22. Do you agree with the proposed policy options?

103. A total of 47 respondents answered this question of which 85% (40 respondents) stated 'Yes', in that they agree with the proposed policy options in the consultation document. In comparison, 15% (7 respondents) stated 'No', in that they did not agree with the proposed policy options within the consultation document.

104. From the responses received there was specific support for issues around flexibility for business premises, particularly post Covid-19, as well as support for retaining existing businesses and supporting the rural economy. There was also broad support for the Council to meet its own objectively assessed needs for business premises within the District, and there was some support for considering the needs of other neighbouring authorities as part of this process if feasible. Other respondents disagreed with meeting unmet need for employment and this is considered further below under question 23.

105. The first policy option was generally supported by the comments received. This option related to establishing the economic floor space required including meeting any unmet need from neighbouring authorities and to provide a strategy to bring this forward. One respondent commented that the critical factor will be for policies to deliver this in an innovative and flexible way.

106. The second policy option set out in the consultation document was concerned with providing a spatial strategy for the distribution of new economic development, ensuring that development is sustainable and that it takes into account known constraints. A number of comments were received in relation to this policy option many of which supported the provision of flexible commercial business growth along the A22, A26 and A27 corridor. However, a key theme from responses was that homes and new businesses should be located close to one another including mixed use developments.

107. A number of comments were received in relation to the constraints element of the policy option, where there was a clear focus on landscape constraints in the district relating to the AONB and South Downs National Park. However, it was also acknowledged that the AONB in particular is a working landscape and that sensitive and managed economic growth in this area should be provided.

108. The third policy option related to good design as well as new employment development being supported by the right infrastructure. There was overall support in relation to good design. In relation to infrastructure, a number of respondents commented in relation to transport and how transport infrastructure needs to be improved to attract new businesses as well as it being important to locate new employment in sustainable locations near to where people live, with good sustainable transport choices to reduce transport emissions.

109. In relation to the fourth option, which focused on the retention of existing employment land and existing businesses, comments were supportive and there was a particular focus retaining tourism and retaining locally based businesses.

110. We did not receive specific comments in relation to policies 5 or 6. These options related to the expansion of existing employment and protection of residential amenity. However, there was clear support for policy option 7 that related to directing large-scale employment to sustainable locations.

111. The eighth policy option related to supporting small-to-medium sized enterprises. This was supported by a number of respondents who commented in relation to the need for this due to the Covid-19 pandemic and how we should be supporting local businesses in both urban and rural areas including locating future businesses close to where people live.

112. Policy option 9 in relation to office space, supporting start-ups and small businesses was supported. Similar to comments on other policy options, comments focused on the provision of suitable workspaces close to where people live, the impacts of the Covid-19 pandemic and how this has changed workspace needs. One respondent identified the opportunity to learn from recent experience and whether shared co-working sites could be considered. Overall, respondents considered that policies to support start-ups and small businesses would need to be flexible.

113. Policy option 10 related to supporting rural businesses. Comments were supportive of this option and again flexible policies were suggested to ensure vitality of rural areas and to allow diversification of farms and businesses.

114. In relation to the last policy option, we received one comment which suggested a need to go beyond planning policies to create an environment for the cultural and creative economy to expand and to develop an economic strategy that considers tourism alongside sport and physical activity.

<u>Question 23. Do you disagree with any of the options?</u>

115. This question attracted a low response rate (35 respondents). Of those who responded to this question, 60% (21 respondents) stated ‘Yes’, in that they disagree with the proposed policy options in the consultation document. In comparison, 40% (14 respondents) stated ‘No’, in that they agree with the proposed policy options within the consultation document.

116. The main issue that respondents disagreed with in terms of the Council’s proposed policy options was considering the unmet economic development needs of neighbouring local authorities where possible to do so, the lack of emphasis on the redevelopment of brownfield sites and different ideas on the impact of Covid-19 on existing/new businesses. Agricultural barn conversions were also mentioned where on the one hand these were supported but on the other one respondent was concerned that rural locations attract car / HGV use.

117. Specifically, there were a number of comments on the impact of Covid-19 that suggested that the council should have a more flexible approach to economic development needs within towns and rural areas. It was seen that both office space and retail might see reductions in the future, so these should be allowed by the Council to be converted into other business/community uses, as well as housing by some respondents. It was also suggested that the needs of home working including

in relation to housing design, should be considered as part of the emerging Local Plan, as this was seen as a permanent change by some respondents.

118. Other reasons for disagreeing with the policy options included providing further guidance on the protection of residential amenity where employment uses are intensified/expanded in residential areas and also comments were received in relation to linking economic policies with transport policy in relation to ensuring that sustainable and genuine travel choices are provided.

Question 24. Are there any other policy options we should be considering?

119. In total 50 respondents answered this question, of which, 39 (78% of respondents) considered there were additional policy options. The policy options put forward are summarised below under a number of key themes:

Agriculture and rural business:

- Re-greening of farms to create jobs, new business and address climate change;
- Integrating the exploitation of new opportunities in the Green Economy into a more comprehensive development strategy;
- Setting out how jobs associated with the rural / agricultural economy can be supported;
- Consider rural areas in the north equally to those in the south;

Climate change:

- Supporting businesses to transition to low carbon and carbon neutral business environments and practices;
- Energy requirements, carbon efficiency standards and renewable energy requirements for employment premises should be required;
- Tree planting on industrial/commercial estates;

Tourism:

- The words ‘tourism’ and ‘leisure’ should be included in policy wording as this provides employment opportunities;
- Include a policy to deal with the expansion and/or intensification of existing and well-established tourist and outdoor recreational businesses;
- Provide a specific policy relating to Bewl water to support it as a leisure destination and to uplift the quality of buildings through regeneration and design;
- Support creative industries and align these with the tourism sector.

Improving education and skills;

- Work with universities and colleges to set up a science / technology park;
- Examining how to strengthen local links with higher education and research facilities in the South East to support high-value and innovative business development.

Flexibility, managed workspaces and businesses;

- Identify local business and development needs;

- Create local work hubs to enable local working;
- Co-locate residential and commercial premises;
- Ensure that if land is allocated for commercial use that it is used as commercial use;

Residential amenity;

- Industrial estates should be relocated where these are surrounded by residential; and
- Avoid expanding employment uses in residential areas.

Other suggestions:

- Consider policies that facilitate new and emerging industries such as the creative arts, virtual reality, artificial intelligence and online retailing;
- Wording to policy option 2 should be updated to include '…..that takes into account business needs and population growth alongside the known constraints';
- Assessing the finance needs of local businesses and addressing any difficulties in accessing finance;
- Promoting networking and cluster development, especially in sectors where there are local strengths;
- Collaboration between the Highway's Authority is needed to improve bus and rail services to serve employment locations;

Question 25: Do you have any other comments in relation to how we can plan for employment within both the urban and rural areas of our district?

120. This question attracted the highest response rate (67 respondents) for the economy section. Of those who responded to this question, 91% (61 respondents) stated 'Yes', in that they have some other comments in relation to how we can plan for employment within both urban and rural areas of our district. In comparison, 9% of respondents (6 respondents) stated 'No', in that they have no further comments to make on the economy chapter. Almost all comments received supported the drive to provide more employment opportunities in the district including supporting both existing businesses as well as attracting new businesses to the area. The key areas of focus for comments received are summarised below:

121. Many respondents commented on the Covid-19 pandemic and how this has changed working practices. Respondents considered that it will be important for us to gain an understanding as to whether these changes, such as more home-working and unemployment in certain sectors are long-term, noting the impact that this may have on the need for office space and the types of jobs that are available.

122. Following on from this, many respondents confirmed that that they would support flexible policies to support small businesses that would accommodate remote working and working locally through the provision of good quality co-working spaces in villages and towns, close to where people live. One respondent suggested that hospitality meeting space should be encouraged and used.

123. Many respondents focused on the rural economy including tourism, agriculture and small rural businesses and suggested that the local plan should provide more of a focus to support the rural economy and agricultural sectors, especially post Brexit. A number of ways were suggested including retaining agricultural land to provide food and jobs and supporting the expansion of existing rural businesses and the encouragement of new rural businesses. One respondent also considered that the expansion of outdoor recreation should be supported. Diversification of farm enterprises and conversion of redundant buildings was supported by a number of respondents, however other respondents considered that diversification may not be appropriate where the nature of the business would encourage traffic or heavy good vehicles on rural roads. One respondent considered that diversification uses need monitoring as well as consultation with neighbours and communities. One comment was made that considered more accommodation is required for rural workers.

124. Infrastructure was also a common theme where similar to previous questions respondents considered that improving transport and access links and infrastructure to support and attract businesses is essential as is improving public transport and providing safe cycle and pedestrian paths on routes between places where people live and work. Ultra Low Emission Vehicles (ULEV) infrastructure at employment locations as well as cycle parking was also commented upon. A number of respondents also raised a need to improve broadband and mobile infrastructure to support businesses. Loosely connected to infrastructure, one respondent suggested that roof space of commercial buildings could be used for renewable energy purposes.

125. A number of respondents commented on the location of future employment land. In general, respondents considered that employment should be located close to housing and that edge of village or town business parks should be encouraged. Specific comments were received in relation to locating employment on the A22, some of which were supportive and some which were not. Reasons against related to ribbon development and not being close to where people live. A number of respondents were supportive and considered that the A22 employment corridor has the opportunity to support future growth and support economic aspirations, where this is provided alongside an increase in housing.

126. A number of comments were received in relation to how, where and what types of employment provision we should be supporting and encouraging. The range of comments included: encouraging the expansion of industrial areas, providing more business space including in the north of the district, for us to focus on small businesses rather than large companies, focus on delivering businesses on brownfield land, attract higher paying businesses and create high-tech centres of innovation. A number of comments were also received in relation to supporting young people and a need for higher education in the district to reduce out commuting and to increase skills.

<u>Duty to Cooperate partners, statutory consultees and partner organisations</u>

127. The employment chapter attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes District Council, Eastbourne Borough Council, Mid Sussex District Council, Rother District Council, East Sussex County Council, Natural England and Historic England.

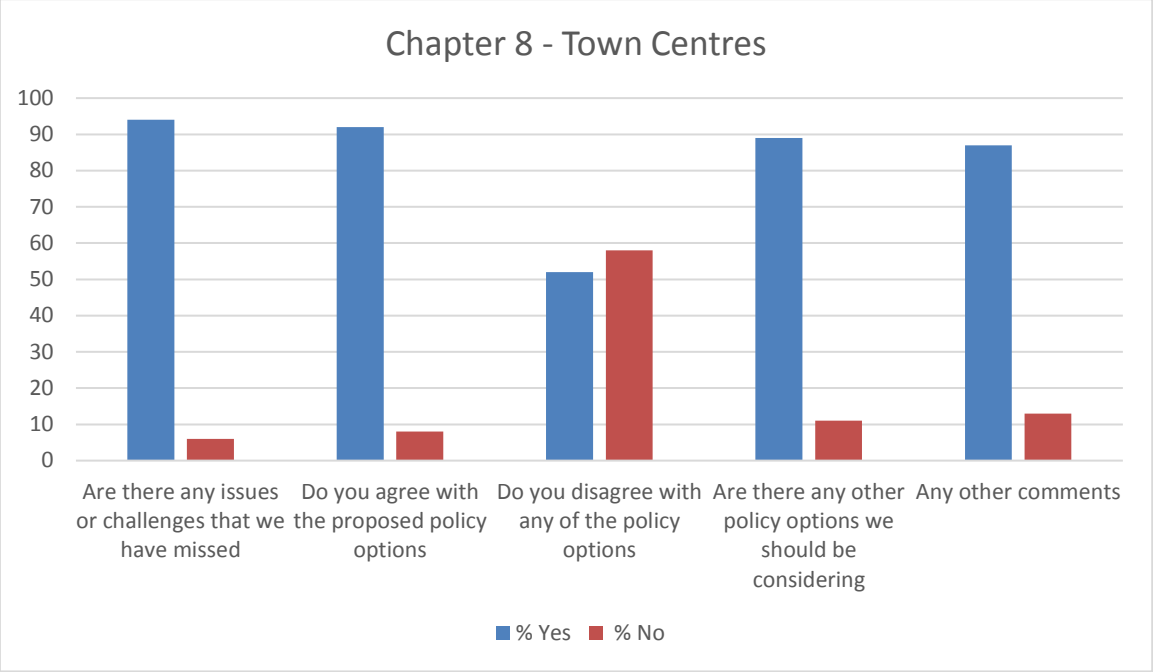
128. Other partner organisations that responded were: CPRE, Rail Future, Crowborough Chamber of Commerce, Uckfield Chamber of Commerce and the Board of Ashdown Conservators.

129. A summary of all these responses are included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Lewes DC supported the employment policy options.
- Eastbourne BC noted they are unlikely to be able to meet their need for employment space and welcomed Wealden considering meeting unmet employment needs from neighbouring authorities. They raised their concern over the impact of Use Classes changes on the provision of future employment space in the borough and suggested Wealden consider policies around community wealth building / social value principles.
- Mid Sussex DC supported the main growth corridor for employment on the A22/A26 and A27 subject to road network and junction capacity, especially in relation to the A22 that intersects the northeast corner of Mid Sussex.
- Rother DC raised the uncertain impact of Covd-19 and changes to uses classes and the challenges this creates for plan making around employment issues. They suggested allocations based on 'type' rather than reference to a use class and welcomed opportunities to work collaboratively on evidence bases.
- ESCC noted that the Local Plan should plan for appropriate amounts of all types of business floor space including water management operations. They raised issues such as homeworking, reuse of redundant buildings and the impact of Covid-19 on plan making.
- Historic England highlighted the role that the conservation and enhancement of the historic environment can play in building a strong local economy (e.g. tourism, attracting businesses and heritage led regeneration).
- Natural England noted that in seeking to meet unmet needs from other local authorities Wealden must be careful not to compromise valued landscapes or important environmental assets. An integrated approach to meeting needs is required.

Chapter 8 - Support and regenerate our town and local centres by attracting the right investment and creating vibrant places that provide for our community's needs

130. The Town and Local Centres chapter set out the context and issues and challenges facing our town and local centres. The issues and challenges identified included EU transition, the Covid 19 pandemic, the influence of higher order centres located outside the district, internet shopping, vacancy rates, multiple retailers, retail unit format, physical environment and the public realm as well as recent Government changes to the use classes order and permitted development rights. We also provided a summary of policy options that we can take forward in the local plan.



Question 26: Are there any issues or challenges that we have missed?

131. There were a total of 48 responses to this question. The vast majority of respondents who answered 'yes' to this question (44) provided information on additional issues or challenges that they considered we had missed.

132. A key theme within the comments received was a focus on transport and access issues. Respondents emphasised the importance of free car parking in supporting town centres as well as the need for better walking, cycling and public transport infrastructure. A number of comments picked up on the changing nature of retail trends and the implications for the future role of our town centres including current uncertainty as to how to plan for town centres in the current context but also an understanding that new opportunities to repurpose our town centres may arise in response to changing circumstances.

133. Some respondents focused on the type of uses that should be protected or encouraged while other uses it was suggested should be restricted. Issues were also raised about the physical layout of our town centres and a need for more public open space, better links to green spaces as well as more space for pedestrians. Comments addressing our local centres and villages stressed the importance of parking and supporting employment uses. There was support for the concept of the '15-minute neighbourhood' in relation to our towns and larger villages where people could meet their everyday needs within a 15 minute walking radius of their homes. This could help reduce vehicle use and encourage walking and cycling. There were comments on business rates and council tax, which falls outside planning control and also more general comments on the plan making process. A short summary of the responses under the main key areas of focus are set out below:

- Transport and access including: a need for better public transport services between towns and villages including Sunday services, better rail provision, reconfiguration of town centres to resolve traffic congestion, better parking and access by sustainable transport modes, to reconfigure town centres so that they can become transport hubs including public transport, cycle and walking

infrastructure, improve coordination of public transport in relation to rail and bus and consider the ’15-minute neighbourhood.

- Car parking including: the provision of more / better parking, the importance of free car parking and parking time restrictions to encourage footfall, the enforcement of illegal parking and also providing electric charging in town centres;
- Future of town centres in relation to: implications of the Covid 19 pandemic, implications relating to online shopping, how retail space can be re-utilised, repurposing town centres to be service, leisure and community hub focused, opportunities to plan for a different future for town centres, a need to align appropriate town centre retail provision with future growth and a need to take an evidence base approach when planning and providing policies for town and local centres.
- Diversity and mix of uses including: retaining post offices to support retail web sales, support the provision of services and community provision such as libraries and spaces for social activities, provide leisure services and a café culture, support pubs and the hospitality sector in town centres, repurpose unused space for example above shops, introduce residential uses to increase footfall and promote pop up uses and flexible working spaces.
- Environmental quality / public realm including: provide additional space for pedestrians and leisure uses, reinstate public toilets, provide green space in town centres and also green corridors between towns and villages to assist in accessibility and protect town centre heritage.
- Local centres and villages including: villages should be quiet and peaceful rather than vibrant, resolution of parking issues and better parking in villages to support businesses and a need for policies to support employment generating businesses within villages;
- Taxation including: reducing business rates for some categories of business including independent retailers to encourage diversity and to keep town centres vibrant, address the imbalance in payments between towns and villages.

Question 27: Do you agree with the proposed policy options?

134. We received 37 responses to this question. 34 respondents, (92% of those who answered this question), agreed with the policy options and also provided further detail. The comments received were generally very supportive of the policy options outlined for town and local centres. There was support for setting visions and highlighting possible improvements within the larger town centres that could be brought forward by future development proposals.

135. The first policy option related to setting visions and objectives for town centres and the potential to identify specific town centre improvements that could be brought forward through future development proposals. There was general support for this policy option. Further comments were made including supporting town centres through further housing development, opportunities to develop residential accommodation above commercial properties and also how regeneration including improved access to town centres (cycle and pedestrian) are essential.

136. No specific comments were made in relation to the second option that related to the NPPF requirement of establishing a hierarchy of town and local centres. Policy option 3 did attract comments however. This policy option related to another NPPF requirement in relation to defining the extent of our town centres and primary

shopping areas. Comments were centred around a need for flexibility and potentially smaller defined areas to reflect supply and demand / consumer needs to enable future investment to be better focused.

137. No direct comments were received relating to policy option 4 or 5. These policy options related to directing new major retail / leisure into larger town centres and out of town retail.

138. Policy option 6 related to supporting and encouraging the regeneration and development of appropriate town centre sites and encouraging a suitable mix of uses. In general, the comments made here were about vibrancy including a lack of both private and public investment in our town centres, an oversupply of charity shops and tired retail units and how these can be a disincentive for businesses such as cafes that require a positive environment. Other comments related to retaining and attracting local businesses, residential accommodation above commercial premises and also the changing retail market in relation to new sale strategies of large retailers and a focus on click and collect. Article 4 directions[2], it was suggested, could be used to prevent inappropriate residential uses in core shopping areas. A comment was also received saying that this policy option is welcomed for Crowborough.

139. Policy option 7 was about supporting the delivery of a range of shop unit sizes to meet the needs of retailers and businesses. Comments here related to a need to plan for new e-tech changes and how we should provide a variety of retail spaces to assist independent retailers to establish.

140. There was overall support for policy option 8 in relation to encouraging café cultures, pop up shops and shared spaces. A comment was also received about takeaways and how these do not have to mean 'unhealthy' food.

141. Similarly, support was provided for policy option 9 in relation to protecting community uses, local shops and services. A number of respondents commented in relation to the effects on our town and local centres of the Covid-19 pandemic, including how we need to gather evidence to understand the impacts of increased online shopping and how high street retailers can compete when they incur business rates. It was suggested by one respondent that town centres should be more service focused including social and economic support activities.

142. Additional comments were not provided in relation to option 10 about town centre markets.

143. A number of comments were received that related to policy option 11 that supported the policy option to preserve and enhance the character and appearance of town and local centres. Comments included reducing vehicles in town centres, more tree planting, improvements to the physical environment and public realm.

[2] An article 4 direction is a direction under article 4 of the General Permitted Development Order which enables the Secretary of State or the local planning authority to withdraw specified permitted development rights across a defined area.

Question 28: Do you disagree with any of the policy options?

144. There were a total of 36 respondents who answered this question, of which, 15 (42%) disagreed with a policy option / options. Reasons for disagreeing with the policy options included:

- That it is too early to propose more street markets due to the Covid-19 pandemic;
- A query whether street markets are a net gain for Wealden?
- That larger units should be located in business parks at the edge of settlements rather than cramming everything into a town;
- Uckfield is successful because it has green space at its heart that can be used for events to attract shoppers;
- Policies are too 'new' development focused;
- That business should not be converted to residential in village centres;
- That town centres will be very different in the future and policies need to look to the longer term and that Wealden needs to be a catalyst to start the journey now;
- That online retailing will remain and chasing large retailers is speculative and should be discouraged;
- Accept town centre development plans instead of an adhoc approach;
- Importance of integrating residential uses in town centres to support them;
- That policies should not restrict the 'flexible use' approach introduced by the Government;
- Shops are generally used for convenience shopping;
- Defined areas need to be considerably smaller than they are currently;
- Recent Government legislation provides a risk to town centres. The focus should be on a smaller core and then positively planning for residential and employment use as needed.

Question 29: Are there any other policy options we should be considering?

145. In total 36 respondents answered this question. Of which 32 (89%) considered that we should be considering other policy options and provided comments. A number of policy options were suggested by respondents, of which some were place specific and others were more general in nature. A summary of the general responses is provided below:

- Planning policies should recognise those businesses that cannot be delivered online and those that can bring the community together such as service businesses, hairdressers, nail bars, cafes, restaurants and post offices;
- Expansion of a retail park around Diplocks way in Hailsham;
- Improve accessibility to town centres and address road congestion and parking for those who need to drive;
- Protection of retail frontages to prevent change of use to residential;
- Introduce a levy on deliveries by LGVs to raise revenue and protect the character of the high street;
- Use empty shops to provide 'drop in' shops for local crafts and consumables;
- Provide covered markets to increase town centre offer;

- Consider how to attract shoppers rather than lose them to other locations outside of the district;
- Enforcement of limited time parking in village centres;
- Support businesses that can provide both a shop and online services;
- Plan for possible changes to the retail industry and economy with a focus on urban village clusters that provide services;
- Encourage residential uses in town centres including investment in green infrastructure, shared public space, work hubs and good public transport;
- Improve rural bus services to and from town centres;
- Link town centre policies with public transport and sustainable travel needs;
- The provision of e-hubs both in town centres and close to transport connections;
- Re-examine the role of garden centres and impact of taking footfall from town centres;
- Identify a unique offer for town centres rather than compare to other town centre locations; and
- Supporting vibrancy of town centres through new development.

Question 30: Do you have any other comments in relation to how we can plan for retail in our town and local centres?

146. In total 52 respondents provided a response to this question of which 47 respondents provided additional comments. The comments received continued the themes set out in the chapter. There was a general view in many of the comments was that our town centres are experiencing change and that the Local Plan will have to consider the future role of our town centres with perhaps less of an emphasis on retail uses. As with other questions, transport remained a consistent issue with support for better public transport. The importance of free parking and the role in supporting the town centres was also raised. There were also concerns that new development would increase congestion. A number of comments were also locational specific in relation to villages and towns within the district. Many of which focused on traffic and transport and accessibility issues. Comments were also received in relation to the importance of obtaining an up-to-date evidence base to guide the direction of planning policies relating to town centres.

147. The key areas covered by respondents included:

- Future of our town centres including: considering and addressing the impact of online shopping and high rents and rates for businesses in town centres, considering the impact of the Covid-19 pandemic, repurposing of town centres including services, cultural, community purposes, provide flexible space, consider housing mix and population and link this to the provision of town centre uses and facilities.
- Town centre uses including: the provision of more clothing shops, limiting the number of certain uses in the town centre such as hairdressers, charity shops, betting shops, estate agents, encourage pop up shops to test business, improve business, retail and leisure uses, focus on local production to combat online economy and supermarket culture, encouraging the hospitability industry to support employment and a night time economy.
- Transport including: improving public transport and access to town centres, provide free and adequate amounts of parking, consider traffic impacts of new

development, provide pedestrianised areas, provide green routes to and from town centres, encourage sustainable travel.

- Town centre environment in relation to: retaining and protecting the character of town centres, views to and from town centres and the impact of new development both around and within town centres.

Duty to Cooperate partners, statutory consultees and partner organisations

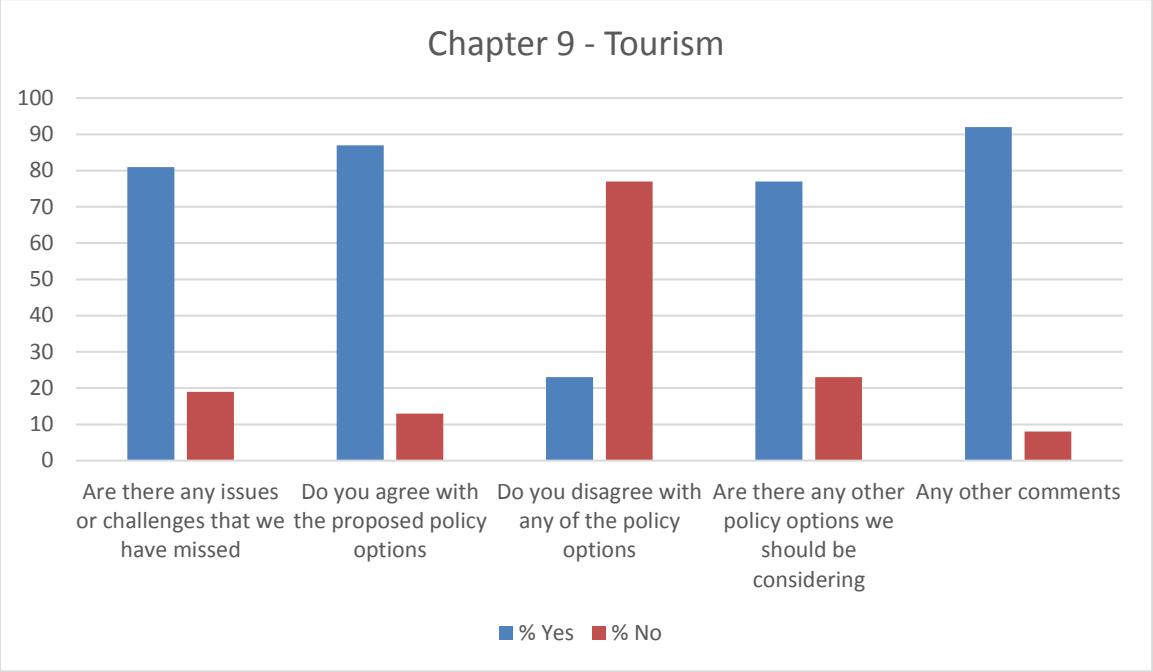
148. The Town Centre chapter attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes District Council, Eastbourne Borough Council, Tunbridge Wells Borough Council, Rother District Council, and Historic England. Other partner organisations that responded were CPRE and Rail Future.

149. A summary of all these responses are included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Lewes DC supported the policy options.
- Eastbourne BC requested Wealden to consider the role that Eastbourne town centre plays as well as the impact of large scale out of centre retail development could have on Eastbourne town centre. They acknowledge that retail located nearer to homes would reduce excessive travel and raised the issue. They also raised the impact of new permitted development rights on town centres.
- Tunbridge Wells BC noted that our evidence for town centres will need to be updated along with the settlement hierarchy in the new Local Plan.
- Rother DC noted it was not clear from the policy options whether the new Local Plan would allocate large mixed use sites in Hailsham.
- Historic England noted the role the historic environment can play in ensuring the vitality of town centres and villages by protecting and increasing the distinctiveness and attractiveness of historic cores and range of heritage assets.

Chapter 9 – Improve our existing tourism offer and increase visitor spend

150. The tourism chapter set out a number of issues and challenges that we will need to consider as part of the Local Plan including how to: protect our tourist attractions and visitor accommodation while providing new opportunities to develop such businesses; how to balance our support for tourism with a need to protect the landscape and providing the right infrastructure and how to attract higher spending and longer staying visitors through improvements to the accommodation offer. We also set out a number of policy options, as discussed below.



Question 31: Are there any issues or challenges that we have missed?

151. There were a total of 48 responses to this question, of which, 39 of those who responded (82%) considered that there were additional issues or challenges.

152. There were two related issues that came up most frequently in the comments received. The first was the importance of protecting Wealden's environmental assets. The second was the negative impact that the construction of new homes would have on the tourist industry in the district.

153. An issue that also generated many comments was the contribution that equestrian activities could and does make to the tourist offer in Wealden.

154. Transport was another key theme with respondents supporting better sustainable public transport links to tourist attractions that would help reduce car travel. A smaller number highlighted the adverse impacts tourism might have on congestion, parking and emissions. Walking and cycling was also highlighted as important for the tourism economy.

155. Many respondents felt 'eco' tourism linked to the high quality environmental assets in the district should be a core part of the tourism offer while others also highlighted the roles farming, viticulture and heritage could also play. There were specific comments on options to promote tourism at the Ashdown Forest.

156. Camping and caravan sites received a mixed response with comments highlighting the adverse landscape impacts. Another supported the restriction of 50 week holiday homes, where concerns were raised that these were being used as poor quality permanent homes. However, a comment also suggested that increased provision of campervan stops would help to boost tourism.

157. Better branding and marketing of Wealden's tourist attractions was also raised as was the importance of making policy on the basis of up to date evidence.

158. There was a request for a specific policy relating to development at Bewl Water from Bewl Events & Water Parks Ltd that would set criteria for future development at their site.

Question 32: Do you agree with the proposed policy options?

159. There were a total of 52 responses to this question. The vast majority of respondents agreed with the proposed policy options (87%) while 13% disagreed.

160. There was general support across each of the policy options with many comments stating support for all policy options outlined. The policies that were most discussed in the comments were option 3 on specific types of tourism accommodation needed and option 5 that supports and facilitates the sustainable delivery of experiential tourism.

161. There were two specific instances where institutions requested a specific policy in the emerging Local Plan. The National Trust outlined a desire for a supporting policy to address their sites at Birling Gap and Sheffield Park where significant developments or changes are anticipated. Similarly Bewl Events & Water Parks Ltd also sought a supportive site-specific policy for development at Bewl Water that would provide clear parameters for the future development at the site specifically with regards to overnight accommodation options.

162. Some comments did set out reasons for disagreeing with some of the policy options outlined. There was disagreement that self-catering and camping type holidays were over-represented in Wealden and a comment sought additional support for this type of accommodation. One commenter disagreed with the fact we had not defined 'sustainability' in the chapter. The National Trust viewed option 8 as a somewhat punitive policy goal that may assume that tourism is intrinsically harmful to other uses and activities and suggested its removal as an option. A summary of the responses on each of the options is below:

- Policy Option 1 supporting the sustainable growth of tourism in Wealden attracted strong support. Commenters wished to see improvements to existing rural attractions that focused on increasing revenues and attracting high yield visitors.
- Option 2 seeks to facilitate high quality tourist experiences and increase the length of stays while also encouraging year round stays. This was strongly supported. Comments reflected on how Wealden's tourist offer was well placed to meet the demand for 'staycations' following coronavirus pandemic. Additionally, allowing businesses flexibility to adapt to social distancing measures was also considered important.
- Option 3 seeks to facilitate visitor accommodation to meet future needs in the district. The comments were broadly very supportive of this policy option to support the wider tourism industry. A comment noted the lack of higher quality accommodation such as hotels and spas. The National Trust offered to work with the Council in researching the accommodation needs of the district. A comment supported the provision of tourist accommodation but sought to restrict this in the South Downs National Park.
- Option 4 on farm diversification was welcomed to help support both the tourism industry and the wider rural economy of the District. One respondent wished to see this complement rather than replace viable food production.
- Option 5 supports the sustainable delivery of experiential tourism. This was also welcomed including by key providers such as the National Trust. The opportunity of viticulture was recognised but respondents also highlighted other

possible growth areas such as ‘wellness’ retreats, heritage or attraction specific experiences.

- Option 6 seeks to raise awareness of the tourist offer. This also received support. Respondents felt that more could be made of the literary links in the district such as Winnie the Pooh or Conan Doyle in Crowborough, as well as the high quality environmental sites such as Ashdown Forest and the High Weald.
- Option 7 seeks to consider the location and design of tourism related development to minimise the need to travel by car and promote sustainable modes. This was supported in principle, however it was noted that existing attractions can be totally dependent on their location and therefore be dependent on dispersed transport models. New technologies such as electric vehicles it was suggested may help to reduce environmental impacts in the future.
- One respondent felt option 8 should have gone further in promoting green tourism that specifically avoids adverse impacts on the environment and conservation sites such as Ashdown Forest SAC and SPA. This option related tourism development not leading to adverse effects on the character, historical significance, appearance or amenity of the district.
- Option 9 seeks to protect our visitor attractions. It attracted strong support. Commenters stressed the need to protect valued landscapes and the unspoilt environment that they felt was at the heart of the tourist offer in Wealden.

Question 33: Do you disagree with any of the policy options?

163. There were a total of 25 responses to this question. Of those responses, only 8 disagreed with the policy options presented (23%).

164. This question generated fewer comments than the other questions in this section, which indicated that there was general support for the options outlined. Of the comments received there were very few responses that disagreed with the options outlined.

- On option 1 a comment made a general point on the contradiction between the desire to reduce private motor vehicle travel and the goal of increasing tourism in a rural area.
- Doubts were also raised about the need for more hotels or guest houses in response to option 3.
- Concern was raised with option 4 that promotes farm diversification. One comment felt that this might negatively impact local food production.
- The National Trust objected to option 8 as it felt it implied that tourism was intrinsically harmful to other uses and activities.

Question 34: Are there any other policy options we should be considering?

165. There were a total of 44 responses to this question. 34 (77%) of those who responded felt there were other policy options to consider. There were a wide

variety of other policy options presented with a particular focus in the following areas:

- Policy options to promote and support experiences themed around 'green' or 'activity' tourism in Wealden.
- Policy options for visitor accommodation including increasing camping facilities with sensitively designed permanent facilities. Another policy option in a similar vein presented the same point but specified that the additional campsites should be focussed in the north of the District. A separate view stated that Wealden's policies on tourism should be aimed at high quality tourism and accommodation.
- Options on transport issues included support of promoting cycle-based tourism across Wealden through improved cycling infrastructure. There was also support for more sustainable forms of transport to improve access to tourist attractions as well as better walking and cycling infrastructure.
- On environmental issues, the support for expansion of the tourism sector outlined in the Direction of Travel document was questioned. An inferred policy alternative was presented that would not support the expansion of tourism in order to better preserve the natural environment. Another policy option on a similar theme sought to limit public access to the natural environment to allow wildlife to recover. There was also support for policies that supported re-greening or rewilding projects. One policy option responded to the Government's Planning White Paper proposals in seeking 'total protection' outside growth and renewal areas.
- In the villages and rural areas, commenters wished to see policy options that supported the expansion of cafes and the regeneration of village halls for other uses such as museums, shops and cafes.
- There was a view expressed that the policy options presented could have more of an emphasis on local history.
- There were a number of site specific policy options presented. These included a policy option that would support improving the facilities at Bewl Water and allowing further onsite accommodation. A proposal for a new park on the Mornings Mill site in Willingdon was also presented. Another policy option was the designation of a field near Vines Corner in Heathfield as a Local Green Space. There was a request for a supportive policy allowing cafes that could improve the food offer for tourist in Maresfield Parish.
- There were a range of other comments received covering the role of equestrian activities, health concerns over staff cuts at attractions, concerns about the impact of tourism on the environment and calls for improved marketing and branding of the existing tourist attractions in Wealden.

<u>Question 35: Do you have any other comments in relation to how we can plan for tourism and culture in Wealden?</u>

166. There were a total of 64 responses to this question with 59 respondents (92%) having additional comments. The comments received were on a wide range of issues affecting the tourism industry in Wealden.

167. In transport terms, there was recognition that increased tourism could lead to increased traffic and that improving public transport provision to key tourist sites

should be prioritised. There was also strong support for improvements to the cycling, walking routes as well as bridleways that could support equestrian activities.

168. There were a number of comments received on what types of visitor accommodation is required to support the tourism sector in Wealden. There was support for an evidence-based approach. In general, commenters were supportive of new visitor accommodation including serviced accommodation and B&BS, provided amenity issues were appropriately safeguarded.

169. Linked to visitor accommodation, there was a view that caravan and camping should also be promoted. There was concerns raised that some caravan sites were being converted to permanent homes that are of poor quality and would negatively impact the level of visitor accommodation needed to support the tourism industry.

170. There was a strong feeling that Wealden's environmental assets should be protected as this was the primary unique selling point of the district's tourism offer. There were comments for additional funds to support tourism at Ashdown Forest.

171. Beyond traditional land use and development issues, there was strong support for improved marketing of the tourist attractions in Wealden. Some comments questioned the focus on viticulture alone and pointed other areas of future growth such as 'green' tourism or activity / adventure based experiences. Others suggested that more could be made of the local history and heritage of Wealden.

172. There were a number of place specific comments received as well There were also some comments highlighting the negative impact of new development as well as some comments that highlighted the negative impact tourism can bring and ways in which these could be mitigated.

<u>Duty to Cooperate partners and statutory consultees</u>

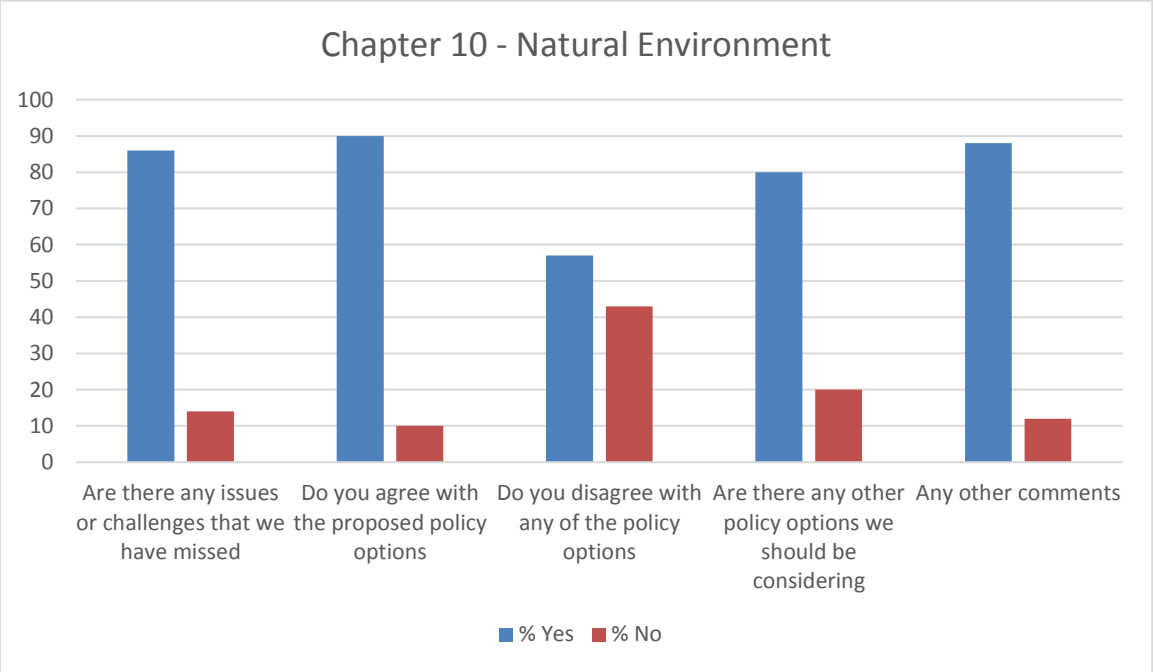
173. The Tourism chapter attracted responses from a number of Duty to Cooperate Partners and other partner organisations including; Rother District Council, Eastbourne Borough Council, South Downs National Park, Historic England, Environment Agency, CPRE, Conservators of Ashdown Forest and Railfuture. A summary of these responses is included at Appendix 2, however in brief the focus of comments received included:

- Environmental impacts associated with tourism on protected environmental assets;
- A request for a complementary approach to the provision of visitor accommodation, taking into account Eastbourne's existing accommodation and role as a tourist destination.
- Support for the reference to the Dark Night Sky reserve in the tourism chapter;
- A suggestion to identify what opportunities exist for the reuse or adaptation of traditional buildings to support the tourism economy or provide visitor accommodation; and
- A suggestion to consider developing green and blue infrastructure that would provide opportunities for green tourism.

Chapter 10 – Protecting and enhancing our natural environment, increasing biodiversity and improving the quality of our green and blue spaces

174. This Chapter was set out in two parts. The first part considered biodiversity and the second part considered green/blue Infrastructure.

175. The biodiversity section set out a number of issues and challenges that we will need to consider as part of the local plan. The overarching issue that we considered was how do we protect, enhance and conserve our biodiversity resource whilst delivering the growth and development we need, whilst also taking into account climate change. We also considered the issues and challenges in relation to greenfield development and delivering growth, achieving a net gain in biodiversity, fragmentation of habitats and climate change adaptation and mitigation.



Question 36: Are there any issues or challenges that we have missed?

176. In total 57 respondents provided a response to this question, of which 49 (86%) respondents considered there were issues and challenges that we had missed.

177. All respondents agreed to the need to protect, conserve and enhance biodiversity. Many respondents provided comments on specific biodiversity species or habitats that we had not mentioned in the consultation document and of which we should be specifically considering in our plan making. This ranged from grasslands and meadows, the water environment / water resources, verges and hedgerows, soils, trees, woodland creation, rewilding, the importance of farmlands as habitats, Biodiversity Action Plan species, Ancient Woodland protection and Nature Recovery Networks.

178. There was a clear focus from the comments received in relation to the impact of development and developing on greenfield land and causing harm to the environment and biodiversity. Many respondents considered that our focus in the consultation document did not go far enough to protect biodiversity and the

environment. There was also specific mention by a number of respondents in relation to Ashdown Forest in relation to recreational pressure and funding as well as protecting the Pevensey Levels.

179. Additional issues and challenges suggested by respondents are summarised below:

- Maintain green space and green corridors between villages and towns to help protect biodiversity;
- Provide a 25 year environment plan;
- Share information about wildlife sites to inform communities;
- Purchase land of conservation value to protect it from development;
- To identify a wildlife corridor map and implement policies to support a nature recovery network;
- To seek 10% net gain as a minimum;
- Create new natural spaces through rewilding and tree planting; and
- Be clear about the evidence required to support and deliver ambitious environmental policies.

Question 37: Do you agree with the proposed policy options?

180. In total, 67 respondents provided a response to this question, equating to just over a fifth of all respondents to the overall consultation. 90% of responses to the question agreed with the policy options presented and provided supportive as well as additional comments to provide further explanation. A key message from the majority of responses was that we should be ambitious in our biodiversity policies as well as ensuring that they are implemented in decision-making.

- Policy option 1 and 2: The first two policy options that we presented related to the provision of onsite biodiversity net gains and off-site biodiversity net gains. Both approaches were generally supported. It was considered by respondents from the development industry that it is difficult to deliver / achieve net gains on smaller development sites. It was also commented that delivering on-site net gains can reduce developable area. Respondents from the development industry therefore welcomed the option of off-site delivery to achieve overall net gains. Other respondents considered that the off-site option should not be seen as a substitute for maintaining on-site biodiversity.

- Policy option 3:This policy option related to protecting biodiversity including designated and non-designated sites and biodiversity features. There was broad support from respondents to this option. However, it was felt by some respondents that any policy wording should be stronger than that provided as the policy option.

- Policy option 4: This option related to biodiversity and ecological networks. A number of respondents commented that they would like to see a strong emphasis on protecting and enhancing ecological links and green corridors. The prevention of fragmentation of habitats was also supported on the basis that this is important not only for biodiversity but also for climate change. Respondents also commented that a strong evidence base to understand opportunities to support delivery of this policy objective would be required.

- Policy option 5: The fifth policy option related to the potential to establish a strategic network of areas/sites that could be identified and allocated for off-site

biodiversity net gains and setting this out in policy. A number of comments were received in relation to difficulties in establishing sites for off-site biodiversity net-gain as well as monitoring the effectiveness of these sites for biodiversity net gain. Also that a long-term approach would be needed. It was also suggested for sites specifically identified to deliver net gain to be identified in the plan and a mechanism in place to facilitate developers to deliver housing and meet the biodiversity net gain requirements.

- Policy option 6: This policy option attracted the most comments. This option set out whether we should require more than the 10% biodiversity net gain requirement for development. Whilst the overall net gain concept was supported, respondents from the development industry commented that we should seek the 10% only. Conversely, other respondents considered that the 10% target is a minimum and that the Council should require a higher amount of 20%. Respondents also commented on the biodiversity metric calculator and issues with this such as it not delivering the desired amount of net gain on the ground and that the metric is not able to account for other impacts to biodiversity such as degradation caused by urbanisation resulting from an increased population.
- Policy option 7: Of those who commented on policy option 7, which related to protecting specific biodiversity features, comments were supportive. A number of respondents talked about features that should be protected on specific sites, namely Downlands in Uckfield.
- Policy option 8: Most comments were also supportive of policy option 8, which talked about introducing buffer zones for important nature conservation sites. Although one respondent from the developer industry commented that this can be supported only where they serve a specific purpose.

Question 38: Do you disagree with any of the policy options?

181. In total, 46 respondents provided a response to this question, of which 26 respondents said they disagreed with the policy options presented. The focus of the majority of comments related to policy options 1, 2, 5 and 6.

- Policy option 1: This related to the provision of on-site biodiversity net gains and the consideration of alternatives only when on-site net gains cannot be achieved. Reasons provided for not agreeing with this option were mainly received from respondents from the developer industry. Reasons included the impact of space requirements on-site to deliver biodiversity net gains and these affecting developable area as well as it being considered that space requirements could have the potential to result in higher density developments.
- Policy option 2: In relation to providing a policy to allow the delivery of biodiversity net gains off-site the key area of focus from the comments received was in relation to the biodiversity that may be lost from the development site itself. A number of reasons were provided including that there is uncertainty as to whether the provision of net gain elsewhere will be successful, that financial contributions should not be used as a substitute for maintaining existing biodiversity or for delivering a poorer environment and that off-site provision should be a last resort.

- Policy option 5: This policy option related to establishing a strategic network of areas / sites to deliver off-site biodiversity net gains. Limited comments were received that directly related to this option however one respondent commented that it will be difficult to recreate and deliver valued habitats elsewhere and that sites may take many years to establish.
- Policy option 6: This option related to considering delivering more than the 10% biodiversity net gain requirement for development. The response to this option was similar to option 1 and attracted responses mainly from the development industry. Reasons for disagreeing included requiring more than 10% net gain could prejudice the ability to fulfil other objectives of the local plan in relation to housing delivery due to more land being needed to deliver biodiversity net gain. It was also pointed out that this policy option exceeds the intended requirement of the Environment Bill. One respondent considered that this option should only be considered where practical and on sites with low initial biodiversity values.
- Policy option 7: This option was commented upon by a few respondents. The responses received considered that providing policy to retain and protect specific biodiversity features is an unnecessary layer of regulation when these are protected by national policy already. In addition, a respondent considered that features to be retained or protected would need to be considered on quality rather than a blanket approach.

Question 39: Are there any other policy options we should be considering?

182. In total, 55 respondents provided a response to this question, equating to just under a fifth of all respondents to the overall consultation. 80% of responses to the question said there are other policy options the Council should be considering and detailed what these were. Key responses are summarised below:

- Increase engagement with landowners in conjunction with the Weald Meadows Initiative and Natural England in order to improve management of unimproved and semi-improved grassland;
- Be more ambitious with the biodiversity net gain target – 20% or 25% Higher targets have been judged viable in other authorities i.e. Lichfield DC.
- Stop building on greenfield land;
- Undertake a district-wide biodiversity assessment and set a baseline from which to work upwards;
- Off-site habitat creation should be supported by a management plan;
- WDC should purchase land in order to protect, conserve, and enhance biodiversity and natural habitat, comparable to the purchase of land for economic reasons;
- Initiate tree planting schemes and sponsorships;
- Set much stricter criteria when considering development of greenfield development sites;
- Better care and maintenance of hedgerows and verges;
- Protection of newly created green spaces;

- Consider policy options for encouraging carefully managed rewilding;
- Balance access to nature and biodiversity preservation;
- Implement measures to secure funding for the management of important biodiversity areas;
- Recognise the contribution that agriculture makes to bio-diversity and give this a higher weighting when assessing suitability for greenfield development;
- Where on site net gains are not possible allow applicants to provide alternative land (in the reasonable locality) and require 10% net gain instead of paying a contribution to a Council-chosen site;
- It would improve public perception of the planning department if it was clearly shown that sites for development were selected on strict criteria laid down by discussion with experts in the subjects of environmental science and ecology; and
- Provide a policy that sets out how the Council will finance the improvements needed to the natural environment, so that an adequate budget is set aside.

Question 40: Do you have any other comments in relation to how we can plan for biodiversity within the district?

183. In total, 93 respondents provided a response to this question, equating to just under a third of all respondents to the overall consultation. 88% of respondents made suggestions on how the Council could plan for biodiversity within the district.

184. The majority of comments received focused on the impact of future growth and the development itself on biodiversity or the loss of agricultural land and considered that we should be doing more to protect biodiversity and agricultural fields. Other comments received, at large from the development industry, considered that the Council is at risk of placing additional burdens on developers that will impact housing delivery, especially if policies require more than what is provided by national panning policy. Similarly, there was a clear division between the developer industry in relation to the requirement for 10% net gain and off-site biodiversity provision compared to other comments where more than 10% was proposed, alongside consideration of on-site biodiversity net gain. The focus of responses are summarised below:

185. A number of respondents commented on specific biodiversity species and habitats, wildlife corridors and green spaces in relation to their importance and need of protection.

186. In relation to policy provision, the developer industry considered that sufficient protection is provided through the NPPF as well as other legislation such as the NERC Act, Tree Preservation orders and Hedgerow Regulations. Other comments were received that suggested the Council should implement strong policies to ensure that biodiversity is protected and at the heart of decision making.

187. A number of respondents commented in relation to the information and evidence base that is required and how we should ensure that information in relation to biodiversity is made available to communities and that we are clear about the specific biodiversity habitats and green corridors that should be protected and how this should feed into design from an early stage.

188. A number of respondents commented in relation to the secondary impacts of development such as increased visitors to protected sites, green spaces and Ancient Woodland and the impact this has on biodiversity. Ashdown Forest was mentioned a number of times in this regard and one respondent considered that dog free zones are required to protect the breeding birds. Related to this, respondents considered that SANGs should be located near to developments and should be easily accessible. Comments also set out concern for Pevensey Levels also, but in relation to housing developments and SuDs.

Duty to Cooperate partners, statutory consultees and partner organisations

189. The first part of the natural environment section that focused on biodiversity attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes District Council, Eastbourne Borough Council, Mid Sussex District Council, South Downs National Park, Rother District Council, East Sussex County Council, Environment Agency and Natural England.

190. Other partner organisations that responded were: RSPB, Sussex Wildlife Trust, CPRE, Railfuture, National Trust, Crowborough Chamber of Commerce, Board of Conservators of Ashdown Forest and Sussex Ornithological Society.

191. A summary of all these responses are included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

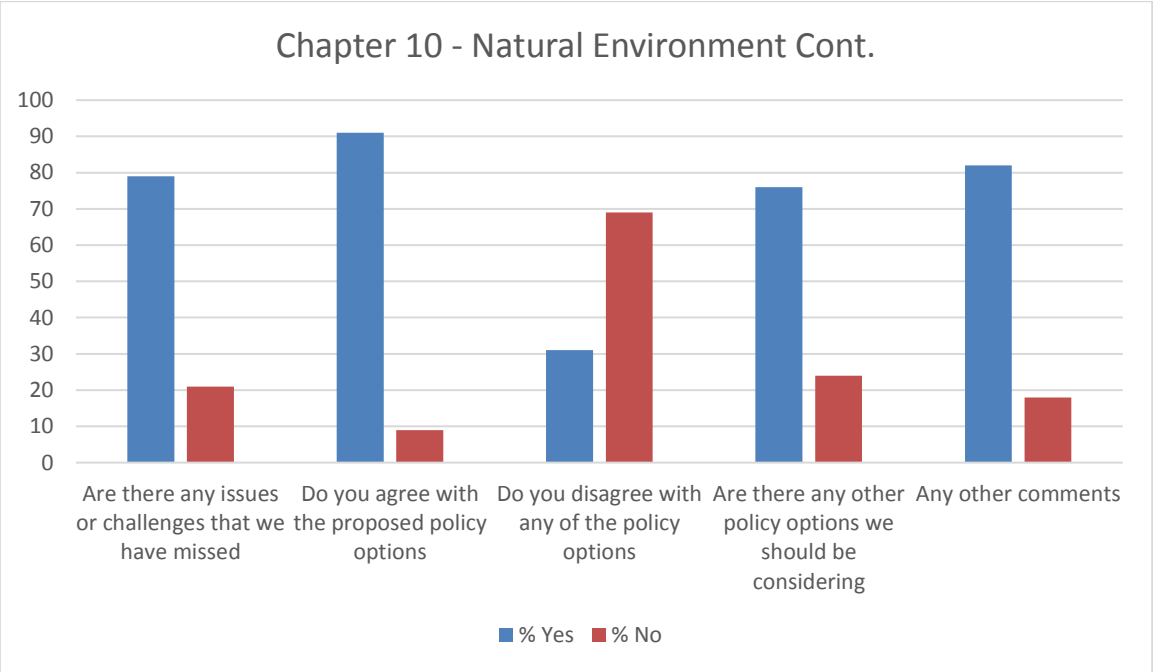
- Lewes DC supported the policy options.
- Eastbourne BC suggested working with WDC to consider if there are options for off-site habitat banks where net gain cannot be provided on-site. They also reiterated a commitment to work with WDC on evidence and policy relating to Pevensey Levels.
- Mid Sussex stated their commitment to joint working on Ashdown Forest SAC issues. They highlighted the needed to protect Ashdown Forest to ensure that Wealden is able to meet their needs as far as possible. They noted that mitigation measures should be clearly set out in future iterations of the local plan.
- South Downs National Park welcomed reference to Dark Night Sky Reserve and suggested adoption of their policy approach on this issue. They suggested the Local Plan should address all designated areas including Ancient Woodland and supported the creation of green bridges across major roads, bringing SSSIs back into favourable condition and welcomed working together in relation to Ashdown Forest duty to cooperate matters.
- Rother DC raised the issues and impacts regarding access to recreation and tourism, for instance the environmental impacts (e.g. emissions and air quality) of travelling and accessing tourism facilities.
- ESCC stated that wherever possible Wealden should seek natural solutions to mitigating impacts from new development. They noted the importance of Local Wildlife Sites and set out Sussex Local Nature Partnership's desire to see 20% biodiversity net gain and explained that Local Nature Recovery Strategies will likely be required at a county wide level.
- The Environment Agency raised the issue of protection of surface waters (inland and coastal), ground waters and the protection of soil and land from contamination. In the north of the District in particular are Source Protection

Zones for groundwater which will require safeguarding. They wanted to see Like to see wider 'environmental net gain' policies being considered for inclusion in the Local Plan.

- Natural England welcomed the identified partnership approach to achieving biodiversity net gain. NE also advised that opportunities for the Plan to contribute to Nature Recovery Networks be included the supporting text. They provided additional guidance and set out approach they will take to the Pevensey Levels.

Chapter 10 – Part 2: Improving the quality of our green and blue spaces

192. This section of the natural environment chapter considered green infrastructure. The issues and challenges that we considered included the growth that we are asked to deliver and the shortage of brownfield land to deliver it and also how we can consider the many different benefits and opportunities that can be delivered through the provision and enhancement of green infrastructure.



<u>Question 41: Are there any issues or challenges that we have missed?</u>

193. In total 52 respondents provided a response to this question, equating to just under a fifth of all respondents to the overall consultation. 79% of responses to the question considered that we had missed some issues and challenges and let us know what these are. The key areas covered by respondents in relation to issues and challenges included:

- Development: The majority of comments expressed concern about the loss of greenspace and agricultural land to development.
- Quantity and quality of greenspace: A number of respondents commented on the shortage of accessible green space in the district and that more should be

provided. One respondent commented that it is not clear how new greenspaces will be provided as part of new development or maintained and another respondent commented that the two new greenspaces that the Council have recently provided does not compare to the greenfields that are being developed. Other comments focused on the quality of green space and how it would be beneficial if the greenspaces provided were less managed and more natural. It was also suggested that green and open spaces should be enhanced to provide a wider range of benefits for residents and how it is important to consider improving and restoring access to the countryside.

- Habitats and Species: In relation to habitats and species a number of comments were received including how more protection should be provided to existing natural areas and wildlife rich habitats. This included specific mention of Ashdown Forest and also Pevensey Levels. In relation to habitat creation a number of respondents commented on the time that it takes for natural habitat to establish and one respondent considered that there should be a 'call for sites' for ecology.

Question 42: Do you agree with the proposed policy options?

194. In total, 56 respondents provided a response to this question of which 91% (51 respondents) of responses to the question agreed with the policy options presented.

195. The 91% who agreed with the policy options agreed with them all as well as the general approach to green infrastructure presented. However, some respondents offered additional comments in respect of them. A summary of responses to the policy options are provided below:

- Policy option 1: This related to resisting the inappropriate loss of green infrastructure and support proposals to enhance the quality and quantity of green infrastructure. This was overall supported. The focus of comments included being against developing on greenfield land. Other comments acknowledged that fragmentation of habitats and wildlife corridors should be prevented and wildlife corridors need increasing to better join up habitats. One suggestion included the construction of land bridges.
- Policy option 2: This related to providing a policy to set out the strategic green infrastructure network in the district and identify what development will need to achieve in relation to it. The third option was also development related in respect of an option to provide green infrastructure principles and standards that developments would need to achieve. These options were mainly commented on by respondents from the development industry who requested further clarification as to what this may mean in practice.
- Policy option 3: We did not receive comments specifically on this option.
- Policy option 4: This related to creating green infrastructure links between new developments and the wider green infrastructure network including existing and new green/blue spaces. There was support for this option in relation to the provision / creation of green links for pedestrians and cyclists within settlements and between settlements. It was also considered that links could be improved between green spaces and that the overall network of footpaths could be better maintained and promoted through policies in the plan. It was suggested this

could be achieved through creating a series of preferred routes from location A to location B or circular routes, aided by improvements in sign-posting. It was also felt this would benefit Options 7 and 8 as well.

- Policy option 5: This policy option was about including green infrastructure within any generic infrastructure policy, alongside more traditional 'grey' infrastructure i.e. roads. Although commented on by a low number of respondents, this was welcomed. It was emphasised that this will require a joined-up approach to designate, protect and expand a strategic green infrastructure network, to maximise the benefits for nature and people.
- Policy option 6: This option talked to the provision of support for the designation of Local Green Spaces where appropriate in Neighbourhood Plans but also through the Local Plan. This had a low response however was supported. It was acknowledged by one respondent that the designation of Local Green Spaces needs to be consistent with the NPPF and local planning for sustainable development needs and should not be used in a way that undermines this aim of plan making.
- Policy option 7: This option was concerned with supporting the creation of new green spaces and the protection of existing. It also related to linkages between green spaces themselves and developments. The provision of new green spaces was welcomed by a number of respondents, especially in areas where there is a deficit. The long-term management of these spaces was also commented upon. In particular, one respondent from the development industry suggested that policies should be clear about maintenance arrangements that the Council will accept. Also where maintenance payments are required to third party management a clear and structured methodology for calculating these payments needs to be formulated. It was further commented that this should not be a blanket requirement however. In relation to new green space a number of respondents focused on SANGs. In particular how these could be more natural rather than managed, easily accessible and also a respondent from the development industry requested for more information in relation to SANG requirements and how SANG provision will be supported through the plan.
- Policy option 8: There were limited comments in relation to this policy option which related to planning for future green and open spaces in areas of deficiency. However, a respondent from the development industry queried whether the provision of green infrastructure will fall outside the typical typologies associated with public open space provision and how the two requirements can be addressed within future proposals, i.e. through combined approaches.
- Policy option 9: This policy option related to enhancing green spaces including for additional benefits. We did not receive any specific comments in relation to this.

<u>Question 43: Do you disagree with any of the policy options?</u>

196. In total, 39 respondents provided a response to this question of which 12 respondents (31%) said they disagreed with the policy options presented. The policy options disagreed with included 1, 4, 7 and 8 as summarised below.

- Policy option 1: This option related to loss of green infrastructure, enhancing access and the quality and quantity of green infrastructure a number of respondents commented along the lines that meeting housing requirements will overall impact on biodiversity and the countryside. One comment also considered the quantity of green space and other open space provision and considered that thought should be given as to how overall provision can best cater for the needs of communities.
- Policy option 4: This related to creating green infrastructure links between new developments and the wider network, a couple of respondents commented of the value of views from public footpaths and how these are a crucial health and well-being resource. Another comment suggested for the option to be reformulated to propose links between existing population centres and the wider green infrastructure network, as well as for new developments.
- Policy option 7: This related to creating new green spaces and protecting existing. A couple of comments were received in relation to this option of which most considered that creating small greenspaces is not a replacement for losing the natural environment and biodiversity.
- Policy option 8: This was concerned with accessibility. One respondent commented on this option and considered that public access for all is not an appropriate policy for much of the rural countryside particularly that which is farmed.

<u>Question 44: Are there any other policy options we should be considering?</u>

197. In total, 38 respondents provided a response to this question, of which, 29 respondents (76%) said there are other policy options the Council should be considering and detailed what these were. The additional policy options suggested are summarised below:

- Include a policy that supports developments that propose green infrastructure where there is a clear benefit of doing so.
- Place limits on the reduction in accessible green/blue spaces allowed within a Parish in any policy to protect green spaces.
- To give thought as to how to provide sufficient land for sports and recreation in towns where there is a deficiency.
- Policies need to ensure active management of the balance between providing access to nature for people and bio-diversity preservation.
- Any design guidance or policies should incorporate the protection and extension of green infrastructure, including support for SuDS in all new developments, and the encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats.
- Provide maps of existing and potential new, green/blue routes and areas as well as key species that can be identified and encouraged through planning policies.
- Policies need to prioritise the retention of existing green space and woodland especially those rich in biodiversity, unique landscapes/features supporting

diverse and rare species over and above artificially creating SANGs and other green spaces.

- Maximise green space between towns and villages to negate urban sprawl and retain local identity.
- More attention should be given to protecting and creating wildlife corridors.
- Consideration should be had to providing landowners with incentives (not necessarily financial) to create wildlife areas and plant trees on their land.
- Consider the establishment of "Green Zones" where special conditions apply, similar to National Parks and the AONB, and destruction is heavily penalised whilst planting and rewilding is strongly incentivised.

Question 45: Do you have any other comments in relation to how we can plan for green infrastructure and green/blue spaces within the district?

198. In total, 65 respondents provided a response to this question, of which 53 respondents (82%) made suggestions on how the Council could plan for green/blue spaces within the district. The focus of responses received are summarised below:

- Green spaces: To provide more and improve existing public greenspaces, provide sufficient wildlife corridors and maintain these, consider rewilding agricultural land, provide better access whilst taking into account biodiversity management requirements, consider limits of the environment in relation to access, provide green spaces for teenagers and also recreational space as well as green space.
- Green space protection: Protect valuable nature conservation areas from development, protect the greenspaces that already exist and protect the High Weald AONB.

  Trees: To provide policies to protect trees and support tree related initiatives, to plant trees as part of SuDs schemes and as part of the road network to create wildlife corridors.
- Green infrastructure delivery: Consider the policy implications on smaller housing sites for green infrastructure delivery and consider whether smaller sites could combine their requirements to provide larger spaces.
- Policy and information: That the policies are not strong enough, that we should avoid a blanket approach to green infrastructure requirements and that we should map and make publicly available information about green infrastructure.

Duty to Cooperate partners, statutory consultees and partner organisations

199. The Green Infrastructure section attracted responses from a number of Duty to Co-operate and statutory consultees including: Eastbourne Borough Council, South Downs National Park, Rother District Council, East Sussex County Council, Environment Agency, Natural England and Historic England..

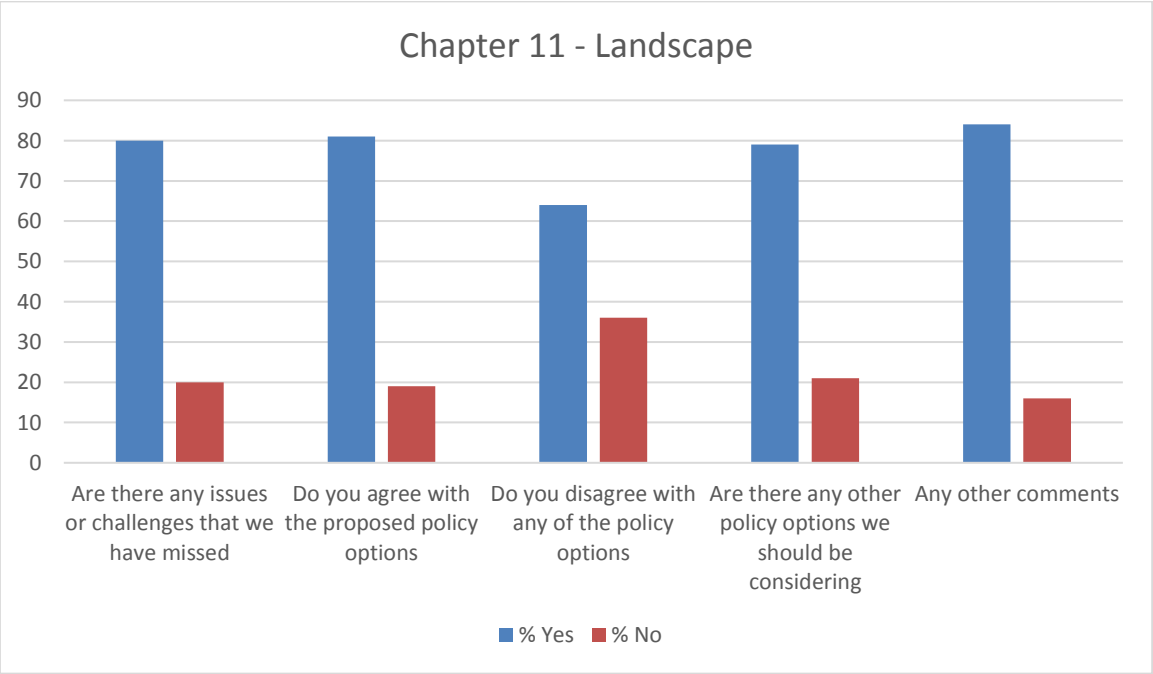
200. Other partner organisations that responded were; CPRE, Railfuture, National Trust, Board of Conservators of Ashdown Forest and Sussex Ornithological Society.

201. A summary of all these responses are included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Neighbouring authorities supported collaborative work on the Green Infrastructure Strategy and Wealden's approach to protected landscapes. .
- ESCC also wished to see further emphasis on improving existing access for people to green and open spaces for all and provided comments on assessing landscape impact.
- The Environment Agency welcomed flood storage being concluded in the policy options. They recommend that the Catchment Partnership be involved in the production of the Green Infrastructure Strategy.
- Historic England noted the close interrelationship between the historic environment and green infrastructure and landscape quality.
- Natural England welcomed the strategic approach identifying areas of need and enhancing access to existing Green/Blue Infrastructure and noted that a strategic SuDs approach for developments affecting the Pevensey catchment could be included in this.

Chapter 11 – Protecting our high quality landscapes, our heritage and cultural assets.

202. This chapter was set out in two parts. The first part discussed landscape, setting out a number of key issues and challenges including protecting and enhancing valued landscapes and landscape features whilst delivering growth including consideration and our 'duty' in relation to the nationally designated landscape of the High Weald Area of Outstanding Natural Beauty (AONB) and the setting of the South Downs National Park. We also considered impacts of renewable energy regeneration including solar and windfarms on the landscape. Policy options for landscape were provided at the end of the landscape section. The consultation questions relating to heritage and cultural assets are considered separately after question50 below.



Question 46: Are there any issues or challenges that we have missed?

203. In total 51 respondents provided a response to this question, equating to just under a fifth of all respondents to the overall consultation. 80% of responses to the question considered that we had missed some issues and challenges and let us know what these are. The majority of the responses received were concerned with the challenge of delivering growth and how this would impact on our landscape and its features, including the low weald landscape, which is not nationally designated. The key issues and challenges raised related to three key areas as below:

- Future growth: This included comments expressing concern about urban sprawl around towns and also Tunbridge Wells and also that we should not accept the housing need figures from Government. Conversely, comments were also received in relation to housing need in AONB settlements and that development can enable the creation of and access to green space. Design of housing was also mentioned in relation to the use of materials to be in keeping with local character and also how innovative design is key to ensuring that development is sympathetic to landscape character. One comment was also received concerning transport infrastructure and potential landscape impacts of this;
- Landscape management: This was raised by a number of respondents including protecting Ancient Woodland and protected sites such as Ashdown Forest and Pevensey Levels. A number of comments also raised that rewilding had been missed as a key issue / challenge and that the environment should be the centre of decision making.
- Protected landscapes: A number of respondents were adverse to development in the AONB and consider that the threats were not stated strongly enough in the consultation document. Financial support was also raised by a number of respondents in relation to the High Weald AONB and also Ashdown Forest in considering that East Sussex County Council has cut funding at the forest. One respondent also commented that protected landscapes should not result in other landscape areas, such as the Low Weald, being put under pressures for development.

Question 47: Do you agree with the proposed policy options?

204. In total, 59 respondents provided a response to this question, equating to just under a fifth of all respondents to the overall consultation. 81% of respondents agreed with the policy options presented and provided further comments. These are summarised below:

- Policy option 1: This related to resisting inappropriate development and this option was overall supported. However, several comments were made where it was considered that inappropriate development has not been resisted in the past and that such a policy should be respected in planning decisions.
- Policy option 2: This related to the provision of a criteria based policy to allow development in the countryside, was supported. One respondent requested that further clarity would be required as to what this policy would entail. It was also

commented that such a policy would need to be supported by an evidence base. The matter of isolated dwellings in the countryside was also raised.

- Policy option 3: This was about considering a policy that protects green and blue corridors. This option was very much supported.
- Policy option 4: This option was also heavily supported. This option related to providing a policy that considers design within the landscape and setting out certain criteria.
- Policy option 5: Many respondents commented in support of policy option 5. This related to putting forward a policy requiring the demonstration of how development has had regard to the objectives of the AONB Management Plan and Design Guide. Caution was also raised that that as the AONB covers such a large area of the district, its protection could result in a disproportionate amount of development in those areas that fall outside i.e. the Low Weald. Comments also highlighted that Wealden have a high housing requirement and in order to deliver homes where they are most needed (particularly affordable housing) it is inevitable that some development will be needed in the AONB and therefore any policy needs to account for this.
- Policy option 6: The sixth option related to providing a policy that protects and enhances landscape features. There was particular support for this policy option in that respondents agreed landscape features in their own right should have protection from / within development.
- Policy option 7: The option to consider a dark night skies policy was also highly supported. It was highlighted that in rural areas, dark skies are being eroded by housing designs featuring, amongst other design elements, double storey-glazed areas which cannot be curtained and whose lights shine out like beacons in rural dark sky areas. In addition, it was felt that any dark sky policy would need clarification and support from an appropriate evidence base in order to assess the appropriateness and soundness of the policy.

205. A number of general comments were made by respondents also. Including a need for a policy to protect the setting of the South Down National Park and how landscape can contribute to health and well-being. There was also a general concern that polices need to be stronger in order to protect the district's landscape from development.

Question 48: Do you disagree with any of the policy options?

206. In total, 56 respondents provided a response to this question, equating to just under a fifth of all respondents to the overall consultation. 64% of those who responded to the question said they disagreed with the policy options presented. Specific policy options that respondents disagreed with were options 1 and 2. Comments were also received that related to option 5.

- Policy option 1: This option related to resisting inappropriate loss of valued landscapes. It was considered that this approach fails to consider opportunities for mitigation as well as opportunities to provide additional housing. The wording of the policy option was also highlighted in that it could be implied that there could be 'appropriate loss' of landscapes which is not accepted.

- Policy option 2: Reasons provided for not agreeing option 2, which proposes a criteria based policy for allowing development in the countryside, were centred around the principle that landscapes should be protected. Conversely, other comments made related to this being a restrictive policy that seeks to reduce development capability and that there should be recognition that appropriate development can take place in the countryside, including that required to meet local housing need. There was also comments that a criteria based policy should not be applicable in the AONB.
- Policy option 5: A number of comments were received in relation to policy option 5. These were mainly concerned with better protection needed for the AONB and concern about growth in the AONB. Comments were also received that support some small scale and sensitive housing developments in the AONB.

Question 49: Are there any other policy options we should be considering?

207. In total, 52 respondents provided a response to this question of which 79% of responses to the question said there are other policy options the Council should be considering and detailed what these were. 21% of responses to this question felt there were no further policy options to consider. The policy options put forward are summarised below:

- Provide ongoing financial support for management of the designated nature sites across Wealden, and in particular the Ashdown Forest SAC/SPA;
- Develop a policy on the forms of rewilding that are appropriate for the different landscapes of Wealden and how rewilding can be supported;
- Provide policies to protect wide rural views from the South Downs National Park;
- Have policies that prevent development right up to the AONB boundary;
- Provide policies to protect the setting of designated landscapes;
- Develop policies around providing opportunities for rural work / upskilling people to work in rural industries;
- Allocate some areas of landscape (i.e. in the Low Weald) for protection;
- Provide policies to encourage the regeneration and reconnection of areas of ancient woodland to improve connectivity with the surrounding landscape;
- Require all large developments to have community orchards and allotments;
- Specifically allocate smaller sites within the AONB (i.e. for up to 50 dwellings);
- Protect and enhance green and blue infrastructure;
- New housing should be in keeping with the local area;
- Include older persons housing in the criteria of appropriate development adjacent to settlement areas and within the High Weald AONB Policy;
- Promote health and wellbeing of residents through protecting the districts wildlife and biodiversity;
- The strength and importance of the public rights of way network in the district;
- That certain landscape areas should be ‘no-go’ areas to stop development;
- That landscape needs to be protected to avoid fragmentation;
- That the protection of the AONB should not be at the expense of putting housing in south of district; and
- The Council should be proactive to inform developers early if proposals are unlikely to be successful on landscape terms.

Question 50: Do you have any other comments in relation to how we can plan for landscape within the district?

208. In total, 82 respondents provided a response to this question, equating to just under a third of all respondents to the overall consultation. 84% of respondents made suggestions on how the Council could plan for landscape within the district. 16% made no further suggestions. The key areas covered by respondents included:

- Better protection of the district's landscape and features including the High Weald AONB, the low Weald, valued landscapes and the green spaces between settlements. The setting of landscape should also be considered.
- There was also support for the protection of Ashdown Forest, views, trees, lane verges, environmental features and agricultural land.
- In relation to development it was considered that land outside the AONB should be considered first and that criteria should be applied to identify when development could be appropriate. A comment was also made in that good design should be applied everywhere including protecting dark night skies.

Duty to Cooperate partners, statutory consultees and partner organisations

209. The Landscape chapter attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes District Council, South Downs National Park Rother District Council, East Sussex County Council, Natural England and Historic England.

210. Other partner organisations that responded were: RSPC CPRE, Railfuture, National Trust and the Board of Conservators of Ashdown Forest.

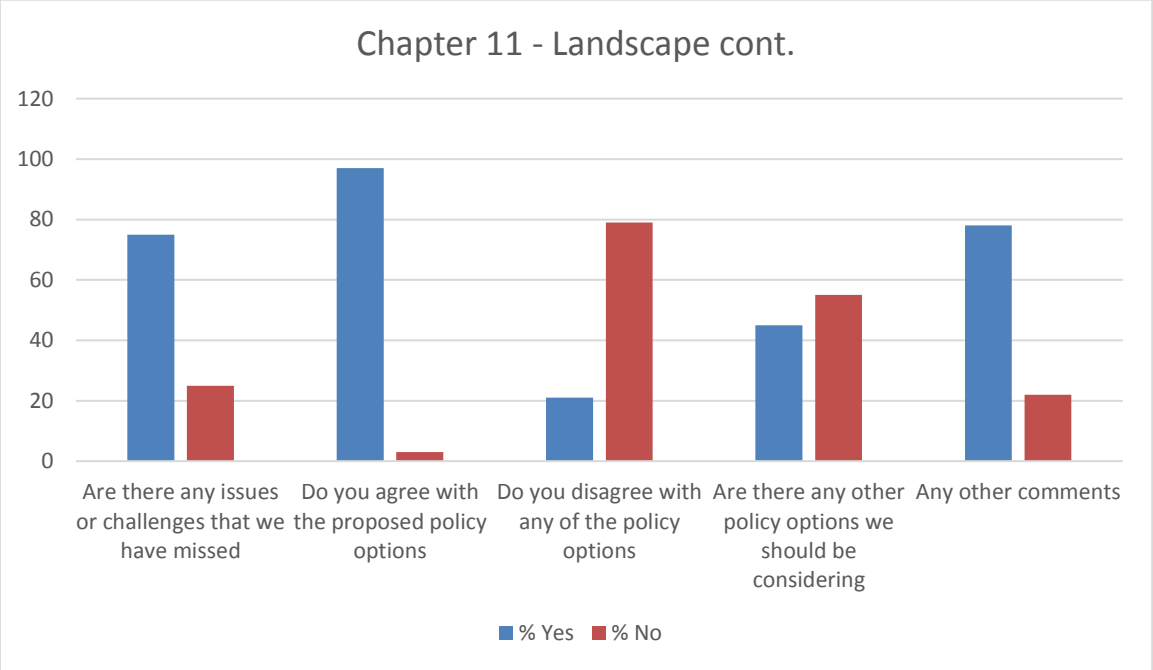
211. A summary of all these responses are included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Lewes DC supported the policy options.
- South Downs National Park supported the approach to protected landscapes and would encourage a thorough understanding of the setting of the national park.
- Rother DC noted the chapter did not mention the issues and impacts regarding access to recreation and tourism. They noted in relation to rural housing there would need to be careful consideration of the scale of development that is appropriate in each settlement, especially within the AONB.
- ESCC felt there needed to be consideration of visual sensitivity and amenity and key views in a landscape sensitivity assessment which could be gained from the East Sussex County Landscape assessment. They noted the third policy option could be expanded to include consider a policy to protect, enhance and create new green and blue Green infrastructure areas and corridors.
- Historic England Historic broadly agreed with the policy options set out for protecting the Wealden's landscapes.

- Natural England raised concerns over reference to building within the AONB. They strongly advise that in order to comply with the provisions of the NPPF Wealden Local Plan should fully explore alternative options for development before proposing development within nationally significant landscapes.

Chapter 11 Part 2: Heritage and Cultural Assets

212. The heritage and cultural assets section set out issues and challenges relating to the pressure of growth that may impact historic character, delivering climate change objectives whilst maintaining the character and appearance of historic buildings and conservation areas and also the impact of piecemeal design and impacts on settlement character. Policy options were provided at the end of the chapter. Overall there was a low response rate to this section of the consultation.



Question 51: Are there and issues or challenges that we have missed?

213. In total 24 respondents provided a response to this question, of which, 75% of responses to the question considered that we had missed some issues and challenges and let us know what these are.

214. The majority of comments received were concerned with maintaining and protecting the historic environment including its setting. The importance of non-designated heritage assets that are important to local people was also raised. One respondent noted the challenge where the interaction of many policies can make it difficult to protect the historic environment but noted the relationship between the historic environment and other important considerations associated with heritage, such as tourism and property prices. The key issues and challenges raised included:

- That development must be sympathetic to the area;

- That Conservation Areas and heritage assets should be allowed to sympathetically evolve and that innovative and sympathetic development should be permitted.
- The setting of listed buildings is not always addressed;
- Lower grade heritage is also important. For example, Oast houses, old farm buildings etc. and a key challenge is how to protect an areas historic identity whilst delivering growth; and
- That it is important to consider heritage assets, but they should not prevent development coming forward.

Question 52: Do you agree with the proposed policy options?

215. In total, 32 respondents provided a response to this question of which 97% of responses to the question agreed with the policy options presented. Most comments received related to policy option 1 or 2.

216. The first policy option presented related to conserving and enhancing the significance of the historic environment through positive management of development affecting heritage assets, including through safeguarding and also in relation to setting. This option was supported, however, a number of respondents raised concern in relation to the protection of non-designated heritage assets, such as sunken lanes, farm buildings etc. and how these also need to be treated sensitively, especially if radical change is proposed for an area.

217. It was also suggested that an addition should be made to the first policy option in relation to supporting development within the vicinity of heritage assets and conservation areas if it makes a positive overall contribution to the character of the area. A request for a local heritage list to protect non-designated assets was also made and concern was expressed about growth and putting heritage at risk.

218. The second policy option was about supporting the use of historic buildings to ensure viability whilst protecting their character and setting. Respondents supported this policy option and there was concern about degraded heritage assets.

219. Other comments received included:

- A request for a positive policy framework to support the re-use and sensitive development of heritage assets;
- That heritage may be sufficiently covered in national policy and that there may not be a need for local policy; and
- We should specifically mention archaeology.

Question 53: Do you disagree with any of the policy options?

220. In total, 19 respondents provided a response to this question, equating to just over 6% of all respondents to the overall consultation. 15 respondents to the question did not disagree with the options leaving only 4 respondents to disagree.

However, 10 people provided additional comments these mainly related to policy options 1, 2 and 5.

221. In relation to option 1, a similar point was made as previously in relation to development should be supported if it makes a positive contribution to the overall character of the area.

222. In relation to option 2, a point was made that careful consideration as to the nature and design of development is required, as what seems desirable and contemporary at one point in time could become an outdated eyesore at another.

223. In relation to option 5, relating to historic buildings and renewables / energy efficiency one respondent considers that the visual impact would be too high in balance and that new buildings should be the focus for these measures.

Question 54: Are there any other policy options we should be considering?

224. In total, 20 respondents answered yes to this question. However, the responses did not all neatly relate to heritage and cultural assets. One respondent commented that greater consideration of the design and development of redundant farm buildings is required and of the siting of 'modern buildings,' within a rural setting.

Question 55: Do you have any other comments in relation to how we can plan for heritage and cultural assets within the district

225. In total, 37 respondents provided a response to this question, of which 29 respondents had further comments as summarised below:

- A request for more publicity for the districts cultural assets;
- That churches in the district are overlooked in relation to tourism and whether it would benefit tourism if there was a complimentary listing and mention of the buildings including their specific historical or heritage interest;
- Re-evaluation of Conservation Areas for their extension and consider introducing 'Areas of High Townscape Value' similar to Eastbourne, where character is special but not quite worth of Conservation Area status;
- Protection of Ashdown Forest and churches and villages.
- Encourage tours of Sussex villages with historic heritage assets and encourage survival of old skills.
- A local heritage list should be drafted to conserve properties;
- The drawing up of Article 4 Directions to curtail the "erosion of historic detail and character" are not supported as there are protections already provided for by statutory legislation.
- There are already sufficient protections for heritage assets within national policies and existing Local Plans and these do not require substantial changes to be made.
- Any requirements for assessments of historic importance within planning policies must make sure that they are realistic and that they do not unnecessarily prevent worthwhile development projects from coming forward.

- Local Plan policies should be clear in their intentions towards development and heritage assets in line with NPPF paragraphs 195 and 196.
- Local Plan policies should provide flexibility through a layering of the degrees of protection of heritage assets to reflect their individual importance.
- It is not acceptable to build over or damage the history of the area
- Piecemeal development within historic towns and villages is not a problem where development is of high quality design, materials, and execution;
- Design of development within historic towns, villages or affect heritage assets needs to be very carefully considered in planning policies because 'innovative' is often the wording used that is neither sympathetic nor without damaging impacts but used to allow development when the context is often wrong
- Policies should recognise the input of Historic England and accord with its advice.
- Concerns that the policy options are well intentioned but will not be enforced.

<u>Duty to Cooperate partners, statutory consultees and partner organisations</u>

226. The landscape Heritage and Cultural Assets chapter attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes District Council, Rother District Council, East Sussex County Council and Historic England.

227. Other partner organisations that responded were the National Trust and the Board of Conservators of Ashdown Forest.

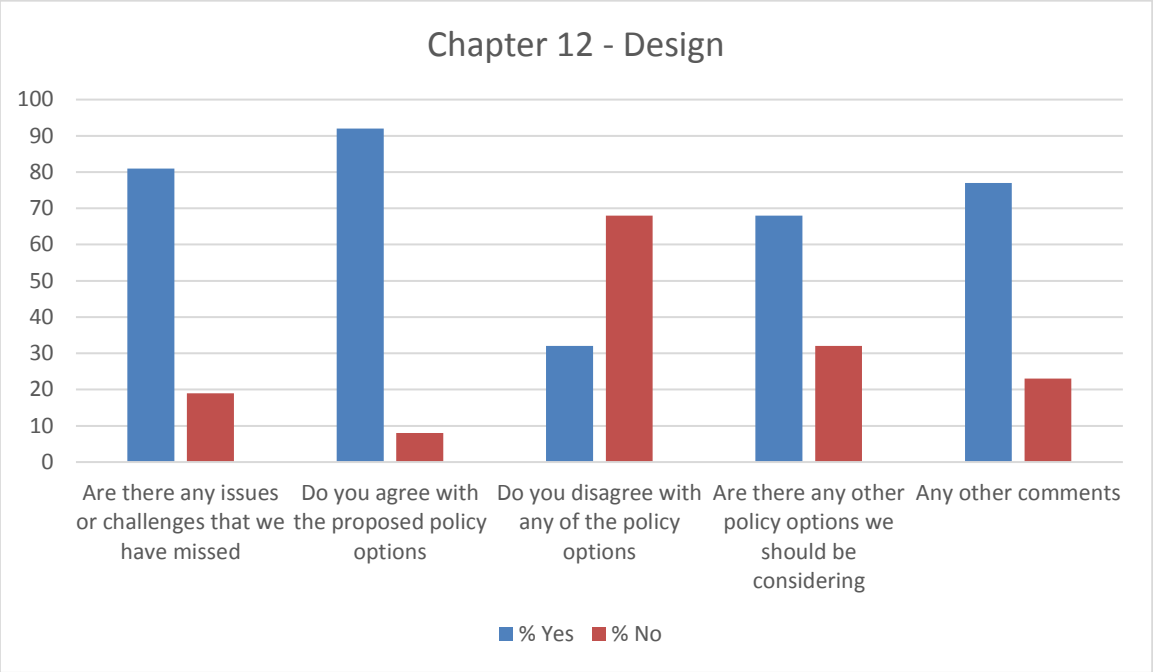
228. A summary of all these responses are included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Lewes DC supported the policies options identified.
- Rother DC noted that approaches to heritage and cultural assets should include archaeological features and underground heritage and also highlighted that policies on this issue may be covered by national policies in future.
- ESCC suggested specific mention of archaeology and the need for establishing archaeological interest/risk early in the process in relation to heritage and cultural assets should be included in the Local Plan through policies.
- Historic England supported the approach set out in the Heritage section and provided factors to be considered. HE suggested that the Local Plan should consider whether there is a need to identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment (NPPF, Paragraph 157).

Chapter 12 – Creating high quality places through good design

229. The design chapter set out a number of design issues and challenges that we will need to consider as part of the Local Plan including how to: achieve good design whilst also meeting the development needs of the district, guarding against generic housing designs to deliver locally specific approaches, encourage innovation rather than pastiche, make sure designs are environmentally sustainable, improve the way our neighbourhoods function and also how we can best respond to the

proposed changes to the planning system. We also set out a number of policy options, as discussed below.



Question 56: Are there any issues or challenges that we have missed?

230. There were 42 responses to this question, of which, 34 respondents (81%) considered additional issues or challenges.

231. There were some key themes that emerged in the issues and challenges that respondents raised to this question. There was a general feeling in many of the comments received that design was not given sufficient prominence in planning decisions and that the existing Design Guide was not always applied. Another commented on the general nature of the design guidance as a drawback. Many comments felt design quality should be insisted upon and development proposals should be refused if design quality is not met. There was also a number of comments that raised the challenge of drafting design policies to drive up the quality of design without being too prescriptive, which can stifle innovation.

232. There were mixed views on transport issues with comments both supporting designs that seek to reduce car use and those pointing out that existing parking standards and narrow road widths can increase congestion and are not appropriate in rural settings. There was also consideration about how road design might change in response to new electric vehicles.

233. Environmental issues were also raised. Respondents highlighted the need for sustainable construction techniques. Others focussed on the need to protect sensitive sites such as Ancient Woodland or the setting of the South Downs National Park.

234. As raised in the Direction of Travel Document, respondents reiterated the issue of generic designs in new housing development and argued that the Local Plan should address this. Specific comments were made in relation to affordable housing and the issues raised when only small numbers of affordable homes are delivered

on sites. There was support for the Council's formation of Sussex Weald Housing and Community Land Trusts.

235. There was a focus on how smaller scale development might deliver better design outcomes in Wealden. One comment raised the role of SME house builders who, it was argued, could respond appropriately to sensitive sites. In addition, the comment also suggested that self-build and custom build, where the owner is highly motivated to ensure good design, may be another model to improve design quality.

236. The concept of the 15 minute neighbourhood, where residents can access their day to day needs within a 15 minute walk of their house, was also suggested along with other place specific and general comments detail below.

Question 57: Do you agree with the proposed policy options?

237. There were a total of 40 responses to this question. 92% of those who chose to respond to the question agreed with the proposed policy options.

238. There was general support with many comments expressing support for all the policy options outlined including from statutory bodies such as Historic England. A number of comments supported the approach subject to further detail that will be provided at the draft plan stage.

239. There was only one detailed comment that did not agree with the options presented. This comment pushed harder for greater improvements to sustainable construction methods given the poor energy efficiency of British homes. It was not therefore against the principle of the policy options but merely sought for them to go further.

240. Policy option 1 set out a vision and design expectations in Wealden and received support. However, a number of house builders and others stressed the need for flexibility in design expectations to allow for variety across the District and fluctuations in market preferences. In addition, there was a request for a policy to cover design expectations of custom and self-build housing projects in particular.

241. Policy options 2, 6 and 12 seek high quality and inclusive design and improvements to the public realm and public spaces. These options received general support in a number of comments.

242. Option 3 related to ensuring that new development reflects character, local distinctiveness and context of the District. This was supported in the responses received. Commenters highlighted the problem of generic housing designs in new builds in recent years and the need to prevent coalescence of settlements. Historic England highlighted the need for the Local Plan to address how new residential development can best be integrated into historic areas of towns and villages.

243. There was particular support for option 4 in terms of maintaining local design guidance. The need for locally specific design guidance as opposed to more general national guidance was stressed. Respondents highlighted the need for the Wealden Design Guide (2008) to be updated to reflect recent changes to national policy and guidance on design codes.

244. There were no specific comments on option 5, option 8, option 11 and option 12.

245. Option 7 relates to the need to protect the natural environment and wildlife. This received strong support from respondents. The same is true of options 9 and 10

that promote sustainability in the construction of new development and later through the development's life cycle.

246. There were other more general comments that supported the analysis in the design chapter rather than specific policy options.

Question 58: Do you disagree with any of the policy options?

247. There were a total of 25 responses to this question. Of those responses, only 8 disagreed with the policy options presented (23%).

248. There was concern that option 5, which seeks to promote social cohesion by ensuring affordable and private homes have the same external appearance would stifle diversity in design and lead to bland developments.

249. A number of objections were received from the development industry to option 8. The respondents did not support the creation of local space standards for new residential development that deviated from the nationally described space standard set by national government.

250. There was also concern about subjective policy objectives into design policies such as policy option 11 that seeks to support people's health and wellbeing.

251. There was also concern raised in one comment regarding option 12, which considers whether there should be specific design policies for different areas of the district. The comment suggested that if this was taken forward the areas should be very specific.

252. There were also more general comments that were concerned about wider planning issues such as the housing figures set by the national government.

Question 59: Are there any other policy options we should be considering?

253. There were a total of 34 responses to this question. 68% of those who chose to respond to the question felt there were other policy options to consider (23 respondents). There was a particular focus in the following areas:

- Policy options for climate mitigation were presented including requirements for EV charging points, carbon neutral homes, improvements to water efficiency, green roofs and the protection of trees and green infrastructure;
- Policy options for the design of new housing submitted including on delivery of homes for elderly people, garden sizes, a pragmatic approach to PD rights that would improve design outcomes and a collaborative approach to the delivery of strategic housing sites using design codes and masterplans; and
- There were other policy suggestions aimed at ensuring development respects the local context and character, calls for a relaxation in parking standards and other options on plan making and design guidance.

Question 60: Do you have any other comments in relation to how we can plan for high quality development through good design within the district?

254. There were a total of 44 responses to this question. 77% of those who chose to respond to the question had other comments to make on how to support good design within the District.

255. The comments received addressed general points about the need for new development to actually comply with design policy and guidance. There was support for updating the existing Design Guide in partnership with Parish Councils as well as making sure there was sufficient staff resource at the Council to ensure that good design in new development is delivered.

256. Another key issue raised was the design of new homes and adopting local space standards in Wealden. Comments highlighted issues they perceived with new build development including higher density housing estates with small gardens, narrow roads, insufficient parking and generic designs. Respondents from the development industry highlighted that any approach to space standards would have to be justified with evidence and demonstrated to be viable. Other key themes included:

- Transport issues where there were mixed views in the comments including calls for improved infrastructure, including roads, a new ring road in Hailsham and a metro line for Polegate to Horam. There were comments that considered car parking should be restricted, while others pointed out the lack of parking provision in new housing developments.
- Climate change mitigation including support for incorporating renewable energy generation, water efficiency into new development as well as calls to lobby government for better building standards.
- Other comments included support for enhancing the public realm, support for contemporary architecture, a call for new forms of public consultation, making sure good design is sought across the entire district, as well as other measures to encourage good design in the district.

<u>Duty to Cooperate partners, statutory consultees and partner organisations</u>

257. The Design chapter attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes DC, East Sussex County Council, the Environment Agency and Historic England. Other partner organisations that responded included CPRE.

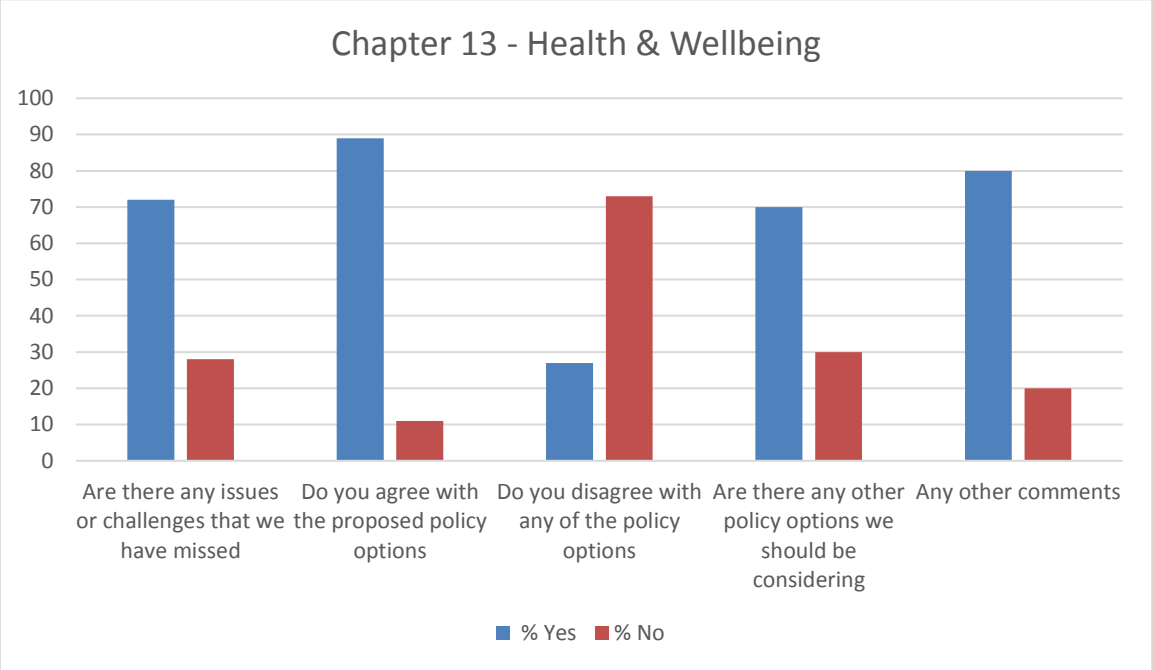
258. A summary of all these responses are included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Lewes DC supported the policies options identified.
- ESCC raised the issue of Circular Economy in respect of the design of buildings. They felt the chapter could be stronger with regard to the importance of ensuring high quality landscape design. Landscape masterplans and detailed design proposals need to reflect local character. Design guides should include requirements and specifications for green roofs and recommendations for the management of boundary features/GI.
- The Environment Agency recommended a policy option specifically referring to climate change mitigation, adaptation and resilience and inclusion of requirements for flood resilience /resistant design.

- Historic England supported the proposed options and suggested the Local Plan consider defining characteristics of each part of the plan area and how new residential developments might best be integrated into historic areas.

Chapter 13 – Help our communities to thrive, living safe, inclusive and healthy lives.

259. The health and well-being chapter set out a number of different issues and challenges covering a range of planning areas including suitable housing for our current and future population, access to services and facilities, our food environment, social isolation and loneliness, health, obesity, active travel and climate change. Some of these areas cross over with topics covered in the earlier chapters, however they are also closely connected to the health and well-being agenda. We also set out a number of policy options at the end of the chapter and asked specific questions on these.



Question 61: Are there any issues or challenges that we have missed?

260. Compared to other topic areas, this question attracted a relatively low response rate with 18% of respondents (57) answering this question. Of those who responded, 72% (41 respondents) stated 'Yes', in that some issues and challenges were missed in the consultation document and 28% stated 'No', in that no issues and challenges were missed in the consultation document. 75% of those who answered this question provided further comments. The key areas covered by respondents included:

- Transport and active travel including: the quality of footpaths and roads, active travel may not be appropriate for the elderly or those with a disability, issues with walking and cycling between schools, local services and

housing, safety for walking and cycling on rural lanes and a need to consider the walkability of places;

- Green space including: increased pressure on green space due to Covid 19 including at Ashdown Forest, an overall shortage of green space for exercise and also wildlife, a need for green space alongside housing, a need for better links to the South Downs;
- Recreation and leisure facilities including: a need for changing facilities to be provided alongside pitches, the enhancement of existing facilities, the need to increase provision to address deficits, encourage gyms, leisure centres to offer a range of activities and protect existing facilities.
- Social infrastructure and cultural facilities including: the role of churches and also pubs, the consideration of community halls as necessary infrastructure and to recognise the cultural value of facilities;
- Infrastructure including the provision of medical facilities and health care provision as well as infrastructure to support active travel (cycling and walking).
- Concerns about health issues were raised including obesity, isolation and loneliness, community schemes to assist vulnerable residents, access to a range of services and opportunities for socialising for all ages to assist mental health. One comment was received relating to health risks associated with phone masts.
- Housing development was also raised in relation to effects on well-being caused by cramped development, a need to design in walking and cycling, that homes for the aging population should be considered as well as different types of housing for older people.

Question 62: Do you agree with the proposed policy options?

261. A similar number of respondents answered this question (55). Of those who answered, the majority of respondents confirmed that they agree with the policy options (89%) and also provided further comments. The key areas covered by comments included:

- For the first and second policy option that related to the provision and protection of open space, sports and recreation facilities there was overall support, noting the importance of good quality green and open spaces and facilities in walking distance from where people live, and especially within large scale developments. There was also a call for these to be planned properly to contribute to the health and well-being agenda.
- For the third and fourth options that related to the location of housing, services and employment and supporting active travel there was support for cycling and walking infrastructure and support for good access to services to ensure that distance is minimised. There was also mention of the opportunities of large-scale development to deliver this policy option alongside a recognition that sites also need to deliver serving infrastructure.
- There were limited comments received in relation to option 5, 6, 7 and 8 but overall there was general support for good design, a concern about rural

crime and support for housing mix to be considered including considering the capacity of sites to accommodate all requirements.

- Option 9 was particularly supported which related to walking and cycling networks including support for both short distances but also longer distance routes between settlements. Option 10 and 11 relating to mixed use developments including provision of open / green spaces was also supported.
- Option 12 that related to social and community facilities was also particularly supported with acknowledgement of how social activities bring positive health and well-being benefits.

Question 63: Do you disagree with any of the options?

262. This question had a relatively low response with only 37 (12%) of respondents answering. Of those respondents 10 (27%) disagreed with the policy options. In summary, reasons why options were not agreed included:

- Concern about using calculations which may 'over provide' open space;
- Concern that developments will be provided that don't link to services and employments which will result in a need to commute;
- Scepticism that healthy, safe and thriving communities won't be achieved; and
- Similarly that the promotion of public transport and active travel does not work in rural areas because people need to drive to travel around.

Question 64: Are there any other policy options we should be considering?

263. A total of 42 respondents answered this question, of which 29 respondents (69%) considered that we should be considering other policy options. The policy areas put forward included:

- A consideration of the benefits of horse riding;
- A consideration of reusing historic land used for health and well-being to be considered to be allocated as green space;
- Speed restrictions on country lanes;
- The consideration of providing a wish list for recreational / sporting facilities to meet demand;
- Better public transport to access fitness facilities;
- Better provision of cycle paths and footpaths;
- Better access to health facilities and community halls;
- Provision for a range of sports including an ice rink; and
- A policy to promote walkable neighbourhoods.

Question 65: Do you have any other comments in relation to how we can plan for health and well-being within the District?

264. This question provided for a higher response rate with a quarter (71) of all respondents answering. Of those who responded, 80% (57 respondents) made further comments. The key areas covered by respondents included:

- Better infrastructure provision for safe cycling and walking to support active travel and leisure activities including in rural areas and to reduce car reliance;
- Better access and provision of medical and health care facilities; there was a call to locate a hospital in Wealden;
- There was general support for housing to be delivered in sustainable locations offering connections to employment and services;
- In relation to sport and leisure there was general support for the protection and provision of more green and open space, village and community facilities and better health and fitness facilities. In addition, to consider better utilising existing green spaces to assist with health and well-being.
- Comments were also received in relation to provision for older peoples housing, a need to coordinate assessments taking into account social characteristics and to consider horse riding and its benefits and infrastructure needs alongside health and well-being.

Duty to Cooperate partners, statutory consultees and partner organisations

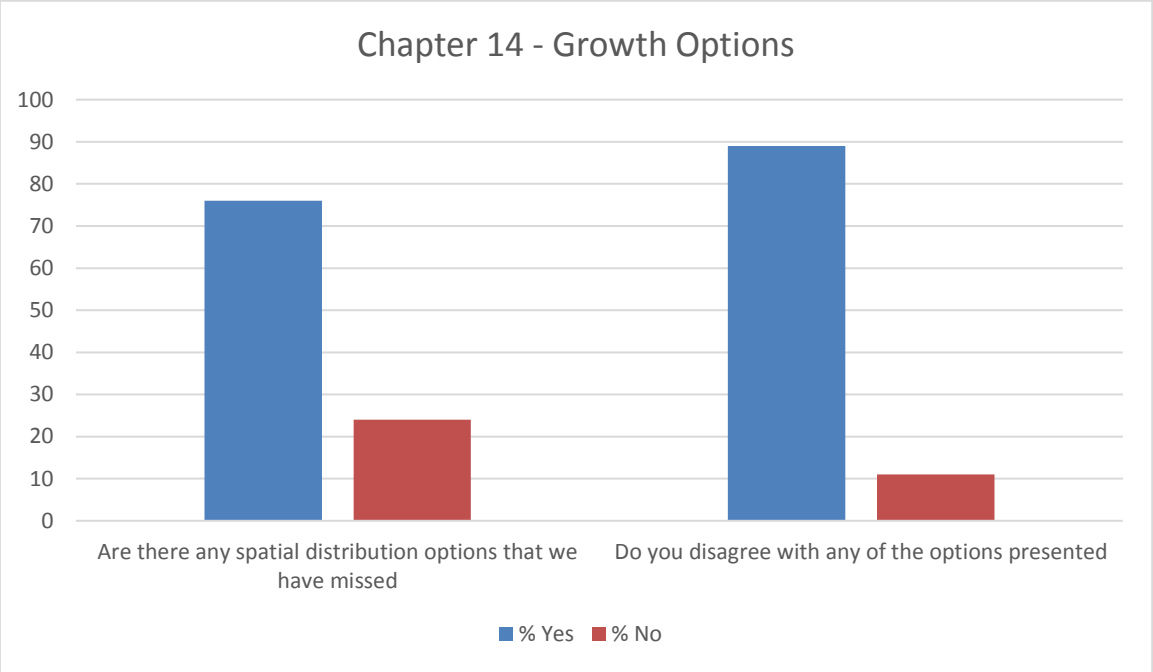
265. The Health and Wellbeing chapter attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes District Council, Eastbourne Borough Council, Rother District Council and East Sussex County Council. Other partner organisations that responded were: Railfuture, CPRE and the Board of Ashdown Forest Conservators.

266. A summary of all these responses is included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Lewes DC supported the policies options identified.
- Eastbourne BC Supported updated evidence for the need for open space and sports pitch provision. They welcome discussions in relation to impacts of growth to services and facilities in Eastbourne and to understand the contribution that future developments should make to the provision of services as part of any proposals.
- Rother DC noted that WDC may wish to draw out the impacts that the redevelopment of leisure provision will have in Hailsham Town Centre in relation to Health and Wellbeing.
- ESCC suggested that references should be made to cultural facilities which generate social connections supporting mental health and increased physical activity.

Chapter 14 – Our Growth Options

267. This chapter of the document considered four high-level spatial options for growth within Wealden District. We explained in the document that the growth options were not related to specific sites or locations of where new growth should take place, but are examples of how we could allocate growth in the local plan. For example, should we deliver all the growth in one or more strategic locations, should we spread the growth to all corners of the district, or should we consider a combination of the options? There were five questions at the end of the chapter that related to the spatial distribution options presented as well as an additional question that asked for feedback in relation to a 'new' freestanding settlement(s) in the district.



Question 66: Are there any spatial distribution options that we have missed?

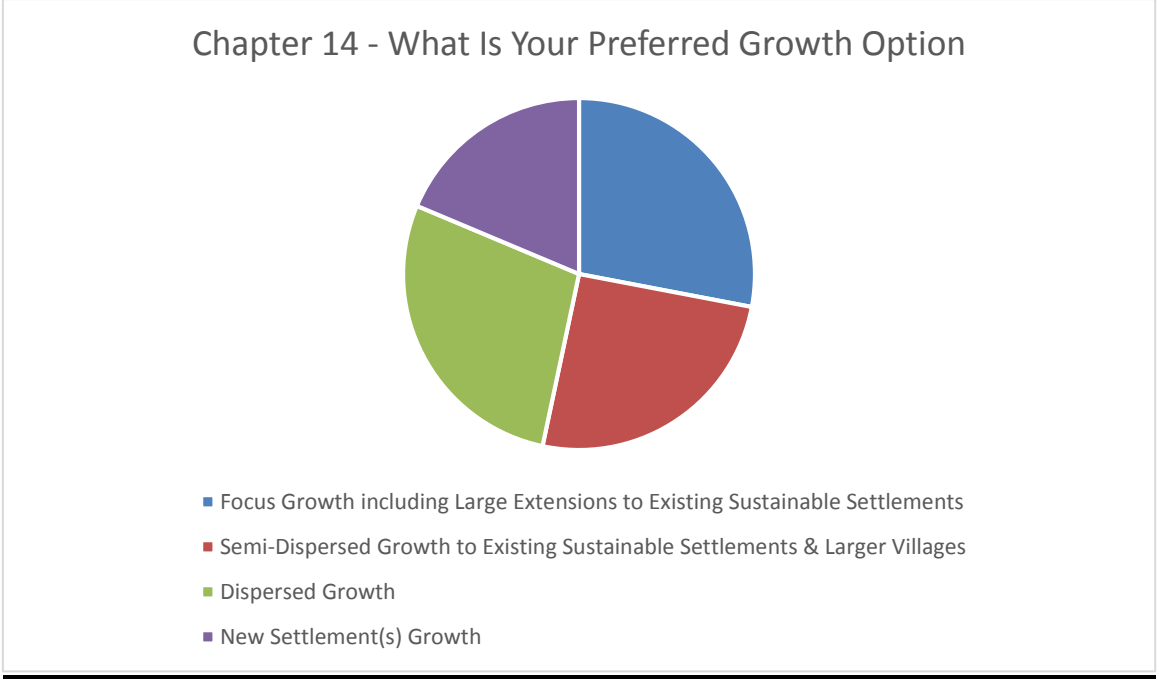
268. In total, 103 respondents provided a response to this question, equating to around a third of all respondents for the consultation. 78 respondents (76%) of responses to this question considered that we had missed some issues and challenges. The main option, which was considered to be missing was a combined approach of two or more of the spatial options presented. For example, it was suggested that delivering option 1 (i.e. extensions to existing sustainable settlements) should be combined with option 4 for a new settlement. The majority of support was for delivering growth in the Low Weald (outside of national landscape designations), albeit that some respondents preferred delivering growth equally across the district. The key areas covered by respondents in relation to spatial distribution options included:

- There was support for the Council identifying sustainable settlements to accommodate the majority of housing and development needs, acknowledging that those settlements have access to good public transport, facilities and infrastructure.

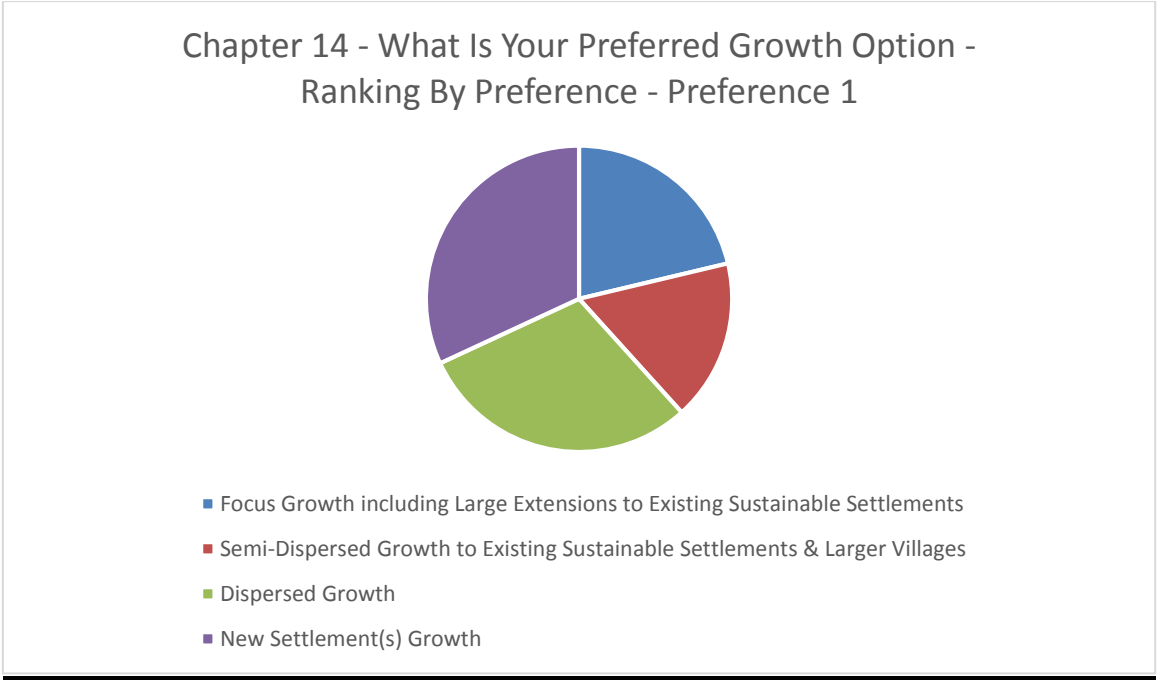
- There was strong support for not allocating major development schemes within the High Weald AONB, close to the South Downs National Park (SDNP) or at sites designated for their biodiversity status (i.e. the Ashdown Forest SAC and SPA).
- There were some respondents who recognised that development in smaller villages and settlements within rural areas was needed in order to support affordable housing provision, as well as improve existing infrastructure/facilities.
- There was general support for delivering sustainable housing sites of all sizes across a large range of settlements, and not rely solely on large-scale strategic locations for growth.
- It was suggested that strategic options for spatial growth should be led by the option's ability to deliver carbon neutrality and particularly those settlements with access to mainline train stations (e.g. Polegate and Uckfield).
- There was general support for ensuring that significant infrastructure improvements are in place to deliver such growth. It was noted that the Government had not committed funding for improvements to the A27/A22 or upgraded rail line/station so this was considered as a risk.
- It was noted that some settlements (Heathfield and Crowborough) were sustainable but largely constrained by the AONB designation, so may not be able to deliver housing growth as envisaged in options 1 and 2.

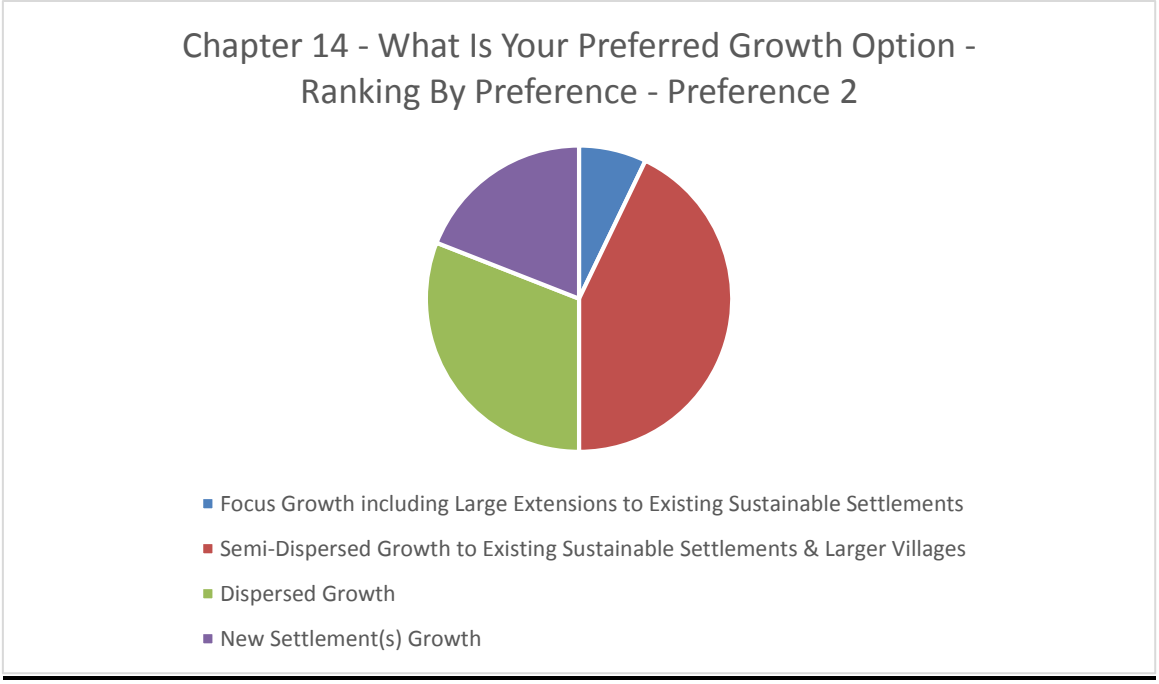
Question 67: What is your preferred option or combination of options in order of preference?

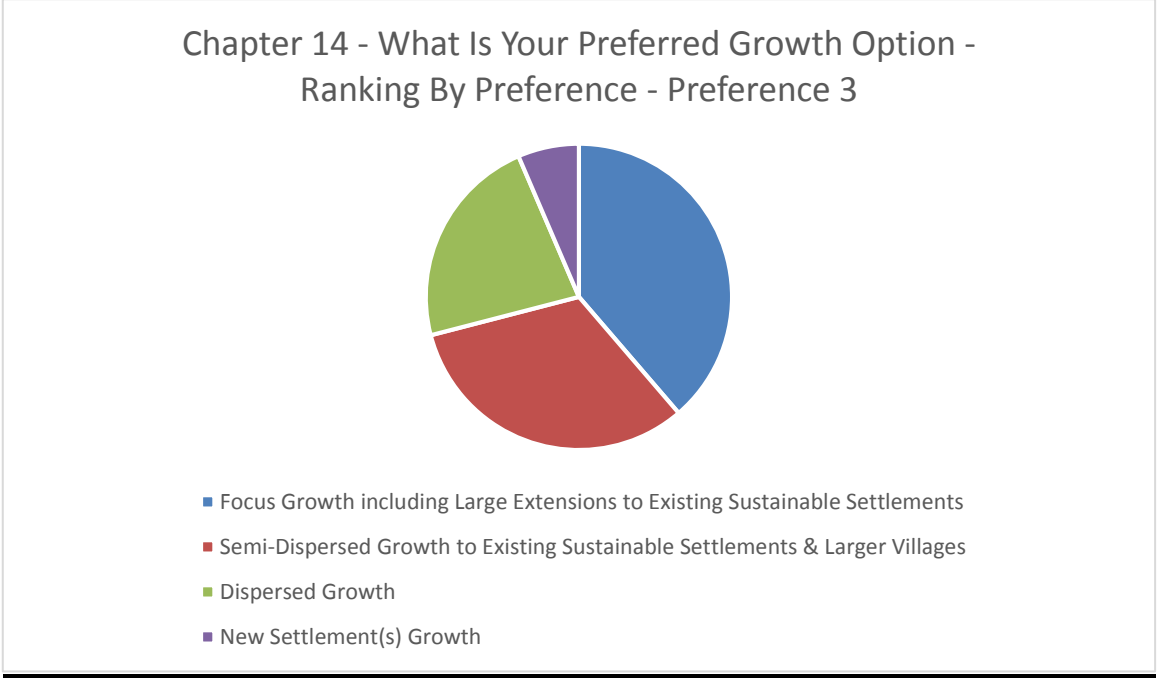
269. In total 105 respondents answered the question that equates to around a third of all respondents to the overall consultation. Four spatial options were presented as part of the Direction of Travel document. All respondents (both through the online consultation system and those who had written in to us) were asked to set out what their preferred option for growth was and this is set out below:

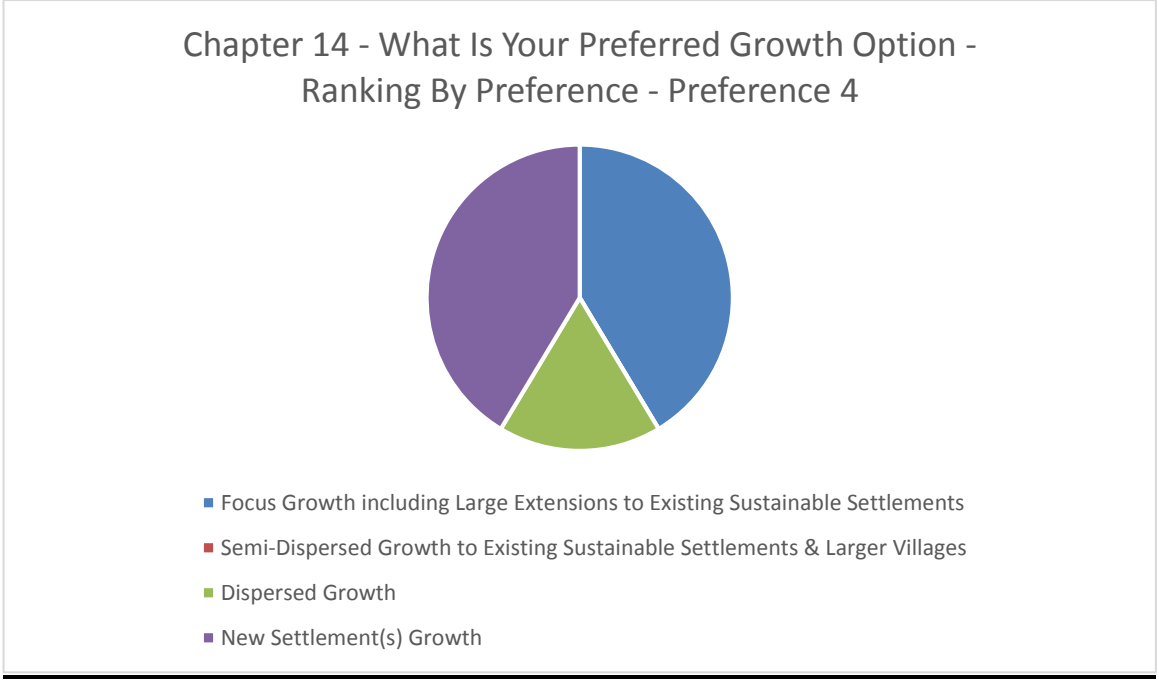


270. There was a number of further questions asked if the respondent had used the online consultation system only, rather than writing into the Council. The respondents using the online consultation system were asked to set out their preferences for growth in order (i.e. first preference, second preference etc.). It should be noted that fewer respondents used the online consultation system, so these results are from a limited number of people (47 respondents) when compared to the 105 respondents who responded to the initial question. The results are provided in the charts below. These charts the percentage of respondents who ranked an option as their first, second, third or fourth option.









271. From the comments that we received to the spatial options question, there was also support for a hybrid approach/option i.e. a mix of the options to ensure that a balanced supply of housing is achieved throughout the local plan period. The main issues for each spatial option are below.

272. Option 1 relates to focusing growth in existing sustainable settlements and is similar to the approach taken for the Wealden District Core Strategy Local Plan (2013). For this option, the district's most sustainable settlements would deliver the vast majority of growth. The main issues raised were as follows:

- There was support for this spatial option as development would be focused in locations with good public transport links and with access to shops, education, employment, leisure and recreational facilities.
- It was stated by many respondents that concentrating growth in these locations will enable quick and easy connection to existing infrastructure and will reduce the extent of new infrastructure required.
- It was noted by some respondent's that the quantum and location of new homes must be aligned with a commercial / economic growth strategy and this would most likely be in/or close to the most sustainable settlements in the district.

273. Option 2 relates to the distribution of growth across the district to sustainable settlements, with the majority of development still being located within the most sustainable settlements (like option 1), but with a larger proportion of growth being earmarked for other sustainable settlements with the district (i.e. larger villages). There was general support for this option for many of the reasons identified above for option 1. It was also suggested that this option would minimise the need to encroach onto new greenfields and may provide better options for developing appropriate infrastructure.

274. Option 3 was to provide for development in all settlements across the district in line with an updated settlement hierarchy, with the amount of new development being proportionate to the size of each settlement, amongst other matters. The main issues raised for this option were:

- It was suggested by several respondents that the other options (i.e. options 1, 2 and 4) were too restrictive and did not allow for the sustainable growth of rural settlements in order to support their vitality and services;
- It was suggested by many respondents that option 3 would share the impact of new development across the district. It was stated that settlements of all sizes should be permitted to grow by a proportionate amount according to their size, facilities and transport links.
- Although there was some support in principle for option 1, it was considered by some respondents that this should not mean the acceptance of 'major' development within the High Weald AONB, so we should consider smaller settlements outside of this designation (i.e. option 3).

275. Option 4 related to a 'new' freestanding settlement(s), potentially in the form of one or more 'Garden Village'. It was explained in the consultation document that this option could also include a very significant expansion of an existing settlement(s). The main issues raised were:

- It was suggested by many respondents that although option 4 may be acceptable in principle, it would be unable to form the basis of a development strategy for the new local plan without pursuing any other of the spatial options described.
- If a location for a new settlement can be found, it was suggested that it could provide for substantial element of housing need whilst limiting environmental impact elsewhere. It was suggested that such development has the opportunity to be sustainable and carbon neutral.

Question 68: Do you disagree with any of the options presented?

276. This question attracted 65 respondents. Of those who responded to this question, 89% stated that they disagree with one or more of the proposed policy options in the consultation document and gave their reasons for this, albeit that this was limited for spatial option 2.

277. Option 1 related to focusing growth within existing sustainable settlements and delivering the majority of growth within/close to those settlements. It was suggested by many respondents that this mirrored previous planning policy within Wealden, which was stated to have 'failed' to provide the infrastructure required, including health and schools and created 'commuter belts' that lacked access to any meaningful facilities on the edge of towns. It was suggested that some of these settlements were located within the High Weald AONB and could not be expanded much further without encroachment onto this landscape designation.

278. Option 2 related to focusing growth within existing sustainable settlements, but also focusing growth in other sustainable, larger villages. Comments received on this spatial option was limited and largely followed the issues raised for spatial option 1 above.

279. Option 3 related to more dispersed growth across all settlements identified within an updated settlement hierarchy, with the amount of new development being proportionate to the size of each settlement. There was some concern with this option as it was felt by some respondents that this option will exacerbate existing pressures on already inadequate transport infrastructure in rural areas and increase car dependency. It was also suggested that the impact of new development on the character of existing settlements, particularly in rural areas, was of paramount importance.

280. Option 4 related to the development of 'new' freestanding settlement(s) within the district of between 2,000 and 5,000 dwellings. Many respondents suggested that the infrastructure requirements needed to serve a brand-new settlement would be significant and evidence from elsewhere would suggest that a development of this nature would take significant resources and time. This would make this option untenable by itself as it would not be able to deliver homes in the short to medium term. It was also suggested by many respondents that such a 'new' settlement could only be located in the Low Weald and would therefore skew both infrastructure and affordable housing provision to the south of the district.

Question 69: What views do you have about the possibility of a new settlement somewhere in the district to provide a large proportion of development needs?

281. This question attracted a relatively high response rate of 83 respondents equating to over a quarter of all respondents to the overall consultation. The main views put forward are summarised below:

- It was recognised by respondents that a new settlement would likely be located within the Low Weald and this would continue an imbalance of growth between the south and north of the district.
- It was suggested that with the uncertainty of funding for large-scale infrastructure projects (i.e. A22/A27 improvements), it would be difficult to allocate such a settlement with any certainty.
- However, it was suggested that such a 'new' settlement(s) would need to be located adjacent to a trunk road (i.e. A22/A27) or ideally, a mainline railway station.
- There was support in principle for a 'new' settlement if it could achieve good design, have access to green space, employment and sufficient infrastructure. There would be excitement at the start of a new community.
- Some respondents suggested that this spatial option would relieve pressure on existing large settlements for growth and that national landscape/biodiversity designations could be avoided.
- It was suggested by some respondents that if a 'new' settlement could not be located near to a railway station, then this would not be a particularly 'green' option, or assist with the climate change agenda.

Question 70: Where do you think a possible new settlement could be located and why?

282. In total 64 respondents answered the question that equates to around a fifth of all respondents to the overall consultation. The main issues raised in terms of the location of a new settlement was its proximity to existing transport links, particularly trunk roads and rail services and that it should avoid national landscape and biodiversity designations. The other key areas covered by the respondents in terms of the location of a new settlement(s) is below:

- A number of respondents suggested that there were no options for a 'new' freestanding settlement within Wealden, as such sites would need to be developed on brownfield sites and around existing infrastructure.
- There was a general consensus that a new settlement would need to be located within the Low Weald (i.e. north of the A27 and to the south of the High Weald AONB), near to a trunk road or mainline railway station.
- Several specific areas of the district were supported in the consultation. These areas included Berwick Station, Isfield, areas surrounding Uckfield, East Hoathly and areas to the west of Hailsham and Polegate. It was suggested that any of these options would require significant infrastructure improvements.

Duty to Cooperate partners, statutory consultees and partner organisations

283. The Growth Options chapter attracted responses from a number of Duty to Co-operate and statutory consultees including: Lewes District Council, Eastbourne Borough Council, Tunbridge Wells Borough Council, South Downs National Park Authority, Rother District Council, East Sussex County Council, the High Weald AONB Unit, Environment Agency, Historic England, Network Rail and Natural England.

284. Other partner organisations that responded were: CPRE, Railfuture, Crowborough Chamber of Commerce, Uckfield Chamber of Commerce and Sussex Ornithological Society.

285. A summary of all these responses are included at Appendix 2, however in brief the focus of comments received from Duty to Cooperate partners included:

- Lewes DC agreed with the reasonable options for growth presented but considers that option 3 (dispersed growth) would be in conflict with other policy options set out in the consultation document such as those relating to sustainable transport and sustainable development.
- Eastbourne BC raised concern that large extensions to existing settlements on the border of Eastbourne may not be the most sustainable option for future growth. They suggested that options for a greater dispersal of growth across all settlements should not be ruled out and that a new settlement could have significant benefits in principle.
- Tunbridge Wells BC noted that any growth delivered as per options 1, 2 or 3 adjacent to or near to Tunbridge Wells may increase pressure on services, facilities and infrastructure in Tunbridge Wells. It will be important to identify and address cross boundary matters that may result through early and continued engagement. They welcomed ongoing engagement in relation to the new settlement growth option.
- South Downs National Park Authority did not express an opinion on the growth options considered but asked that the impacts of any options on the setting of the National Park be minimised in line with the Section 62 of the Environment Act 1995.
- Rother DC requested that if growth is to be located near or adjoining the local authority boundary, such as Normans Bay, Lunsford Cross near Bexhill, or in the Ninfield/Catsfield area Rother would wish to be involved at the earliest opportunity to discuss the wider strategic issues related to focussing development in these locations and how it may impact the development of the Rother Local Plan. They also noted that settlement hierarchy could be updated to reflect new infrastructure delivered through new development.
- ESCC noted that Option 1 is preferred from a biodiversity perspective.
- The High Weald AONB Unit raised concern that the document sets out the wrong direction of travel for the AONB because of its assumption that high housing need figures justify ‘substantial development’ in the High Weald. It recommends a further Strategic Growth Option that reflects Government policy for AONBs.
- The Environment Agency noted that the appropriateness of locations for potential development should be determined once the SFRA has been undertaken with subsequent application of the sequential approach. Options also need to ensure that timely and adequate mains wastewater treatment capacity can be provided so as not to cause detriment to the environment.
- Historic England did not wish to express a view on the growth options at this time and until there is a better understanding of the potential qualitative impacts of the various scenarios, including those on the historic environment. They urged the Council to undertake a robust assessment of the impacts of each of the growth options, including the potential effects for the historic environment, in advance of determining its preferred approach.

- Network Rail noted that should the Council move to develop one or more garden villages within the borough, Network Rail would strongly advise developments in the vicinity of existing railway lines, improving connectivity and boosting the case for the development. An increase in housing supply and business demand along the Uckfield Line would benefit the case for electrification and possible capacity enhancements on the line, furthering sustainable transport and connectivity within the district.
- Natural England noted with significant concern that Options 1, 2 and 3 all propose development in the AONB. This contrary to national policy. On Option 4 (new settlement) NE advised that the Local Plan should demonstrate that options brought forward can demonstrate the least environment impact and comply with the mitigation hierarchy. Also large settlements should include substantive means of improving and providing sustainable transport. NE advised that an integrated master planning approach is adopted considering landscape biodiversity and ecosystems services.

Sustainability Appraisal Scoping Report November 2020

286. The consultation on the Direction of Travel document did not include a specific question on the Sustainability Appraisal Scoping Report (the "Scoping Report"), as this had already been the subject of its own 5 week consultation from 8th July 2020 to 12th August 2020, under Regulation 12(5) and (6) of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The three statutory bodies (Natural England, Environment Agency and Historic England) were consulted, together with the Council's Duty to Cooperate partners and detailed comments were received from all.

287. The comments received were analysed and amendments to the Scoping Report made, resulting in the Sustainability Appraisal Scoping Report November 2020, which accompanied the Direction of Travel document. The Scoping Report was published alongside the Direction of Travel document to give a wider audience the context within which the Local Plan would be developed, however there is no legislative requirement for the Council to consult on the Scoping Report at this stage beyond that undertaken in the summer of 2020 with Statutory consultees.

288. Notwithstanding this, we did invite communities and organisations to comment on the SA Scoping Report and to email / post comments separately. Some respondents did this whereas others included their comments in the question within the Direction of Travel document.

289. There were seven respondents who made comments either directly about the Scoping Report or how it related to the Direction of Travel document. This included Natural England; Southern Water; Historic England, the South Downs National Park Authority and East Sussex County Council, who had all been previously consulted on the Scoping Report in July – August 2020.

290. The comments raised were predominantly concerned with making factual amendments/additions to parts of the Scoping Report in terms of the plans, policies and programmes (PPPs), as well as to several of the SA Objectives and their indicators. Some of the responses also commented on the fact that detailed and robust evidence bases must be used to inform the appraisal of the Local Plan and its policies.

291. Comments also stated that nature based solutions for carbon sequestration, green infrastructure and natural interventions should be referenced in the Scoping Report and that indicators/monitoring should require developments to incorporate nature based solutions for mitigating/adapting to climate change. In particular, it was commented that climate change must be considered not only in terms of energy efficiency and reduction in emissions but also in terms of land use planning i.e. changes in water levels for example over the plan period. It was also commented that targets for habitat enhancement should be secured with the quantum being used as an indicator. It was suggested that enhancing the connectivity of habitats should be a key indicator for biodiversity and that natural capital should be included as a baseline.

292. None of the responses disagreed with the Scoping Report and the approach it set out for developing the Local Plan, however there was some concern over the use of the amount of development in the High Weald AONB having been used as an indicator (SA Objective 9).

293. Overall, it was considered that the Scoping Report was a very thorough document, with a comprehensive listing of the applicable legislation and the key sustainability issues and possible approaches regarding Local Plan policies. However it was stated that the whole appraisal process should result in a detailed Sustainability Appraisal that allows clear conclusions on growth options.

294. Appendix 4 provides a Schedule of responses received and our response to these and changes to the Scoping Report will be made as appropriate. Sustainability Appraisal is an ongoing and iterative process in plan-making and shall be undertaken at the appropriate stages of the development of the Wealden Local Plan.

Conclusion

295. In response to the Regulation 18 Local Plan Direction of Travel Consultation we have received some 1,702 responses from 304 people / organisations. All responses can be read in full and against each relevant question on our Consultation portal. The report above has summarised all of these responses.

296. Within the Direction of Travel consultation document we identified what we considered to be the next steps in plan making following the consultation. It is important to note that the further work that we progress will be reviewed taking into account the planning issues that have been raised during the consultation. Obtaining a proportionate and robust evidence base is our current focus alongside considering at a strategic level what we would like to and need to achieve through the local plan to meet our statutory duty.

297. From the level and the detail of responses that we received and from reviewing each of the responses, we know that this consultation has been a valuable exercise and process. We have learnt what is important to our communities, partners and other organisations and we will use this important feedback, alongside our emerging evidence base and local plan requirements to shape our local plan vision and spatial strategy for how the district should be developed over the lifetime of the plan.

298. A key part of our next steps will be to continue dialogue with our Members and stakeholders (Town and Parish Councils, Duty to Cooperate Partners, Developers, other relevant organisations and officers from other relevant Council service areas) to help us define the vision, objectives and high-level options for the spatial strategy

for the plan. To be clear, at this stage, the vision and objectives will be about establishing our priorities, particularly where there may be competing interests as the plan evolves. As one example, the balance between infrastructure delivery and affordable housing supply.

299. At this early stage, the vision, objectives and spatial strategy will be draft and we will need to test through our evidence base work, whether what we identify is fit for purpose meeting national policy and legislative requirements or whether we will need to make changes to ensure that our local plan and its policies delivers what is required and is the right approach. Following this work, we will consult with the public and all partners, on our draft vison, objectives and spatial strategy (as currently projected) in the early part of 2022. This is set out in our adopted Local Development Scheme (LDS) and Statement of Community Involvement (SCI).

300. Finally, it is important that we thank our communities for their involvement in this process, not least during these difficult times. Importantly we want to celebrate the helpful and constructive feedback we have received and to recognise and share the influence this engagement will have on our emerging local plan.

Corporate Management Team Advice

The Local Plan Sub Committee is recommended:

a) To note the Regulation 18 Local Plan Direction of Travel consultation exercise including publicity that took place to engage with partners, stakeholders and communities;

b) To note the summary of responses to the consultation questions;

c) To agree the next steps in progressing the Local Plan; and

d) To thank all those who responded to the Regulation 18 Local Plan Direction of Travel consultation.

Implications

Financial:

The plan making process has financial implications owing to the costs of resources to undertake the production and examination of the Plan. These costs are being met within the Planning Policy approved budgets and earmarked reserves set aside for the Local Plan.

The content of the Local Plan also has financial implications for landowners and developers through policy requirements.

Legal:

The Local Plan must meet all legal requirements and be found sound in order for it to be adopted.

The Planning and Compulsory Purchase 2004 (as amended) (“the 2004 Act”) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (“2012 Regulations”) set out the requirements and the statutory procedure for the preparation of a Local Plan. This includes Regulation 18 of the 2012 Regulations which sets out a requirement for a local planning authority (“LPA”) to notify specified bodies and persons of the subject of a local plan which the LPA propose to prepare and to invite each of them to make representations as to what a

local plan with that subject ought to contain. The LPA must take into account any representations made (regulation 18(3), 2012 Regulations).

Section 149 of the Equality Act 2010 sets out the Public Sector Equality Duty which provides that a public authority must, in the exercise of its functions, have due regard to the need to –

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Draft Submission Local Plan will be supported by an Equalities Impact Assessment to help identify the likely or actual effects of policies on people. The aim of the assessment will be to ensure that any negative consequences for those people with protected characteristics as defined by the Equality Act 2010 are eliminated or minimised, and opportunities for promoting equality are maximised.

Human Resources:

The development of a Local Plan is human resource intensive. The team is currently well staffed, however there are known and longstanding issues with recruiting professional town planners with the necessary knowledge and experience within the area. The Council is supporting efforts to develop our own staff to help fill this capacity issue.

Climate Change:

The effects of climate change and how we will work to respond to the declared Climate Emergency are major considerations for the local plan as discussed in the main part of the report.

Contacts/ References:

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Appendices	Appendix A: List of Respondents to the Local Plan Direction of Travel Consultation
	Appendix B: Summary of responses from local authority partners, statutory consultees and other relevant organisations
	Appendix C: Responses from Town and Parish Councils
	Appendix D: Schedule of responses received for the Sustainability Scoping Report

Background Papers	Direction of Travel Consultation paper
Published Reference documents	NONE
Key Decision	YES
Exempt / Not for Publication	NO