Wealden District Council Response to the Hailsham Neighbourhood Plan Review- Regulation 16 Consultation

WEALDEN DISTRICT COUNCIL REG 16 COMMENTS	HAILSHAM TOWN COUNCIL RESPONSE
General Comments We congratulate Hailsham Town Council (HTC) on their Regulation 16 Neighbourhood Plan (NP), with a focus on design, sustainable development, green and blue infrastructure and improving the town centre. It encourages compact, integrated development and supports the delivery of community facilities across the town.	Noted. No change required.
Length As stated at the Regulation 14 stage, the plan is long at some 169 pages (inclusive of front and back covers) compared to 90 pages in the adopted ('made') Hailsham Neighbourhood Plan (July 2021) and includes 34 policies and 13 projects. Examiners have previously commented on the length of neighbourhood plans within Wealden District. For example, the Examiner on the East Hoathly with Halland Neighbourhood Plan stated that 'an obvious defect of the NP as submitted was that it did not accord with national planning guidance that NPs should be clear, concise and succinct' (see paragraph 75). Wealden District Council's (WDC) view is that the submitted Hailsham NP is significantly too long. This length would prejudice its qualities for being a focused, user-friendly document. It is still considered that there is scope to combine/amalgamate some of the policies such as some of the Town Centre policies, as well as policy HaGI3: Diversifying and improving existing amenity green space, which could be amalgamated with policy HaCF6:	Our response to the length of the document and inclusion of design related policies within it is set out in the main body of the letter.

Play and amenity space. The length of some of the supporting text could also be reduced in order to provide a more useable, succinct Plan. There is also some repetition between sections, such as: • the 'safe and convenient travel choices for all' section and the 'Movement' section. • the 'Policies and Projects' section and the 'What is in the Neighbourhood Plan' section. In addition, at the Regulation 14 stage WDC questioned whether some of the policies on design (or parts of the policy with criteria setting out what development should be) such as policy HaTC2: Town centre design principles, policy HaTC6: Public Art, policy HaHD1: Housing design and character and policy HaTC4: Shopfront design and signage policies, be moved from the Plan to the Design Guide document. However, if the issues are already covered in the Draft Design Guide, does it need to be repeated in the Plan?	
Deliverability As stated at the Regulation 14 stage, whilst a NP can include aspirations, the place for these is in the projects which HTC can work on developing. The NP itself should focus on land use policies and on what can be delivered rather than being too aspirational. For example, policy HaTC5: Public realm, gateways and wayfinding, confirms that the proposed gateway locations are likely to be outside of any development site. Therefore, it is unclear how they would be funded or materialise in practice? It is also not clear whether discussions with landowners have taken	The Town Council disagrees. It is quite normal for projects to be included in the main body of the plan and for these to incorporate aspirational elements. It is recognised that these will require partnership working and consultation. They may be funded by developers or partner organisations, and change may in some cases be facilitated through development. Some may be appropriate for use of the neighbourhood portion of the Community Infrastructure Levey. The Plan does not commit funding to these projects but does seek to raise awareness of

place with such sites, nor how this would meet the planning obligations test set out in the Community Infrastructure Levy Regulations 20102 or are HTC suggesting the Community Infrastructure Levy (CIL) could be used for this? WDC can confirm that it is unlikely that the CIL retained by WDC would be used for this. In which case, would part 3 of this policy on gateways be better positioned as a project? Another example is policy HaM4: Community mobility hubs, which may also be better positioned as a project rather than a land use policy.	them and help demonstrate how the Plan is seeking to respond to wider matters of importance raised by the community during the consultation process. Some of the policies are also to be viewed as 'enabling' policies: whilst change may not happen in the short term there is a medium to longer term potential for change and improvement, which the policies seek to influence. There is no need to change the Neighbourhood Plan.
Legal Agreements and Validation Criteria As stated at the Regulation 14 stage by WDC, the NP at times verges into areas that WDC will cover such as financial contributions that we would normally secure via a legal agreement (known as a planning obligation), including Policies HaCF4: Allotments and food growing and HaCF6: Play and amenity space. It is not appropriate for a NP to determine when a planning obligation is required or what contributions are required. Such requirements will be determined on a case-by case basis by WDC officers in relation to its statutory development plan and national planning policy. WDC decide what the Section 106 legal agreement will contain based on our local adopted policies and national planning guidance. It is for WDC to both agree and sign Section 106 legal agreements. A NP can support the provision of allotments but not require it; the wording needs to be less stringent in several areas of the NP on this issue. In terms of validation criteria, it is not the role of planning policy to set these out either as part of the emerging Wealden Local	The District Council is misreading these policies. The Neighbourhood Plan does not in any of the policies establish requirements for s106 or other contributions. In respect of allotments and open space provision, the Plan simply says that these should be required in line with standards established in the Open Space study prepared by Wealden. This is a common approach. Equally, the Neighbourhood Plan policies do not establish that additional validation material must be submitted. Rather, some of the policies say that supporting material 'should' provide additional material. This is not a requirement but rather an encouragement for this material to be provided and which will help demonstrate how proposals align with the policies in the Plan. Again, this is a common approach taken in Neighbourhood Plans.

Plan, or within this NP as they are set out by the Local Planning Authority (LPA) (i.e. WDC) through its validation checklist.	
Conformity As stated by WDC at the Regulation 14 stage, for each policy we would expect to see conformity references to show how the NP is in conformity with the National Planning Policy Framework (NPPF) and the strategic policies of the adopted Local Plan. As the Hailsham Review NP has been submitted prior to the new Local Plan being submitted to the Planning Inspectorate, then the Hailsham NP review will need to be in conformity with the strategic policies contained in the existing, adopted Local Plan (1998), Core Strategy (2013) and Affordable Housing Delivery Local Plan (2016). The latest NPPF (August 2026) confirms under Annex A: Implementation, paragraph 6 that Neighbourhood Plans that have been submitted to the local planning authority under Regulation 15, on or before, the date of publication of the NPPF (August 2026) should be prepared in accordance with the NPPF published in December 2024, which is the case for the Hailsham NP Review.	There is no need for the Neighbourhood Plan to state which policies confirm to the Local Plan. Indeed, the adopted Core Strategy and development management policies are out-of-date are soon to be replaced (assuming the emerging Local Plan is found sound). The Basic Conditions Statement explains how the Neighbourhood Plan is in conformity with the adopted and emerging Local Plan (notwithstanding the fact that the regulations have now replaced this test of the Basic Conditions) and, where appropriate, supporting text to the policy indicates the link back to relevant policies in the Local Plan and in the NPPF. This is a common approach. By way of example, the comments from the District Council make reference back to the made Horam Neighbourhood Plan. This does not include conformity references under each policy.
References to the Emerging Local Plan As stated at the Regulation 14 stage, there are frequent references to the emerging Local Plan in the NP, which are quite detailed in places. The draft Wealden Local Plan (Regulation 18) that was published in March 20244 was only a draft version and will be subject to change as we move through our Local Plan process. Indeed, a NPPF was published in December 2024, and there has been a subsequent consultation on a draft 'Focused' Wealden Local Plan (February 2026), so there will inevitably be	The Town Council is happy to update references in the Neighbourhood Plan to the status of the Local Plan. It is however important to retain such references as these establish the direction of travel and context for the Plan. It is suggested that the Neighbourhood Plan make references to the evidence supporting the Local Plan where appropriate. It does. Links and references are contained throughout the Neighbourhood Plan.

changes to the format and content of our Plan that was published in both March 2024 and February 2026. The Council anticipates publishing its Proposed Submission Wealden Local Plan (Regulation 19) shortly. Since the Regulation 14 consultation the references to the emerging plan are now clearly labelled as emerging and the policies are referred to as draft as we suggested. However, we still suggest that HTC use the evidence base underpinning the emerging Wealden Local Plan to support the policies, which is less likely to change (although there will be updates to some). It is still considered that the maps showing proposed allocations from the draft plans could be misleading. See comments below. Figures 2, 20, 23 and 28: The proposed allocations in the draft Wealden Local Plan (March 2024 (pink) along with the proposed employment sites (orange) are not part of an adopted local plan, have not received planning permission, and are therefore subject to change. As highlighted in the general comments above, WDC have since published its 'Focused' Wealden Local Plan (Regulation 18) for consultation, and the proposed allocations may change again prior to the Regulation 19 Proposed Submission Wealden Local Plan publication. It is suggested that the proposed allocations in the draft Wealden Local Plan (2024) (pink) are removed from this map, along with the proposed employment sites (orange) and gypsy and traveller sites (purple).	The Town Council is also happy to update the Plans in the Neighbourhood Plan in respect of the site commitments and allocations. It is however important to retain an up-to-date map as this helps establish the context for the Plan and policies within it.
Repetition of National and District Council Planning Policy There is a tendency in some of the policies to repeat national and district planning policies rather than create locally specific	The Examiner has asked about Policy HaGI1 and responses to this are set out in the main body of the letter.

policies. An example of this is policy HaGI 1: Biodiversity. This is not considered necessary and adds to the length of the document. We have suggested that the TC consider removing any duplication with national or district planning policies when revising the document, so that the NP is succinct in line with previous comments.	
Projects As stated at the Regulation 14 stage, whilst we note that HTC have clearly distinguished the projects from the policies using different colours, some examiners on Neighbourhood Plans within Wealden District have suggested that these are listed in a separate section rather than in the main body of the plan. Given the number of policies in the NP, it is our view that this change would help with the legibility of the plan, providing clarity between both policies and projects to the reader.	The Projects are included within the main body of the Plan as they relate to the narrative and issues identified. This is a common approach. The Examiners Clarification note recognises that the approach taken, and the clear distinction between policies and projects, is best practice. There is no need to change the Neighbourhood Plan.
By Policy/ Section **Introduction** Paragraph 1.1- This is the submission version of the NP, not the Regulation 14 version. The wording of this sentence needs to refer to the correct regulation.	Noted. The Town Council is happy to amend the text.
Paragraph 1.10- The scale and location of growth is reflective of policies in the Wealden Local Plan, but this is based on national planning policy and specifically the 'standard method' calculation of housing need and the how much land can be delivered for development based upon the NPPF. We suggest that you add 'that are based on national planning policy' after Wealden District Local Plan.	It is not national policy that has established the spatial distribution of growth across Wealden. That is based on choices taken to inform the Local Plan. There is no need to change the Neighbourhood Plan.

Paragraph 1.24- We note this has now been altered to refer to the review. However, the terms used of minor and major modifications do not align with the Planning Practice Guidance (PPG). We suggest the terminology in the first bullet point is changed and that in the brackets it is made clear that this is the view of the Town Council. It also needs to be clear that the referendum will only be held if considered necessary by the examiner.	The Town Council is happy to revise the text to refer to minor and material modifications but does not consider it necessary to make wider changes beyond this.
Paragraph 1.25- This is the submission version of the Plan. We would suggest this paragraph is either amended or removed.	Noted. The Town Council is happy to amend the text.
Vision and Objectives The vision is usually written in the future tense as it is the vision for the future i.e. 2042. We would suggest that vision is written in the future tense.	The vision text starts with the words 'in 2042', which makes clear that this applies to a future position. The Town Council does not consider it necessary to change the text.
Planning Policies **HaCF 1 Healthcare** No comment.	Noted. No change required.
HaCF 2 Education and Early Years No comment.	Noted. No change required.
HaCF 3 Community halls, centres and hubs **Wording of the Policy** The wording of part 3 is muddled. It states that: 'Where the loss of a community facility is proposed it is expected that a facility replacement is provided, equivalent to or better	The Examiner has asked about Parts 3 and 4 of the Policy in the Clarification Note. Our response to that is set out in the main body of the letter. This explains that the Town Council is happy for the policy to be amended as suggested by the Examiner.

than exists currently or where the need can be met by an existing facility within the Neighbourhood Plan Area or within reasonable distance of the community using that facility and where evidence is provided that demonstrates that the current facility is no longer required or viable'. With so many different strands to the policy, it is difficult to know which part applies. For example, is it stating that where the need can be met by an existing facility within the neighbourhood area or nearby, a new replacement facility is not required? However, it does not explicitly state this and is likely to be better suited to a criteria style policy The second part also does not define what a reasonable distance is or provide any clear interpretation of this. The evidence necessary for part 3 will also be determined by the LPA and we believe this is better dealt with as part of a Local Plan. Draft policy INF7: Local Services and Community Facilities covers the retention of local services and community facilities and sets out the evidence needed to demonstrate if a building is no longer needed or viable. We realise that the wording of part 3 is very similar to the policy HCF1 in the Horam NP but it is subtly different. The Horam policy supports the loss of a community facility in certain circumstances including where evidence is provided that demonstrates that the current facility is no longer required or viable, whereas policy HaCF3 is requiring evidence to be provided. In addition, the LPA would consider the provision of community facilities on a District wide basis, and this would need to be wider than just the NP area (i.e. Hellingly Parish may be able to provide	

a community facility that is suitable for residents in the north of Hailsham town for example). Criteria 3 of this policy is not supported by WDC at this stage due to its confusing structure and duplication of our draft policy. It also attempts to set validation criteria which a NP cannot do. **Recommendation** Remove part 3 of the policy as it is better dealt with at the district level through the Local Plan.	
HaCF 4 Allotments and food growing **Wording of the Policy** WDC will define when planning obligations/financial contributions are required, dependent on policies in its statutory development plan. This will also be dependent on viability evidence (that is not considered as part of the Hailsham NP) to justify such a requirement as required in paragraph 35 of the NPPF (December 2024). Part 1 of the policy is therefore not appropriate. The provision of allotments can be supported through this policy, but the NP cannot require this. **Recommendation** It is suggested that part 1 of policy HaCF4 is removed or that it is reframed to support the provision of allotments.	The text in the policy does not establish requirements, including those in respect of planning obligations. Rather, Part 1 refers to application of space standards established by WDC. The Neighbourhood Plan does not require nor mandate the delivery of allotments or food growing areas, but rather supports them where proposed. The Town Council does not consider it necessary to change the policy.
HaCF 5 Sports facilities and playing pitches No comment.	Noted. No change required.
HaCF 6 Play and amenity space **Wording of the Policy**	

It is for WDC to determine what play and amenity space is required on a case-by-case basis, based on its statutory development plan. The provision of play space can be supported within the Neighbourhood Plan Area, but the Hailsham NP cannot require this. It is stated that 'proposals for new residential development (resulting in a net gain of new homes) should contribute towards the provision of accessible and inclusive natural & semi-natural green spaces, amenity green space and play space for children and young people'. This does not correspond with the emerging draft Policy INF8: Open space, Sports and Recreation Provisions in the draft Wealden Local Plan (March 2024), which requires open space and recreation provision on residential development of 10 or more dwellings (net). Even then, this draft Local Plan policy is subject to change at the Regulation 19 stage. **Recommendation** It is suggested that the opening paragraph of Part 1 of the policy is rephrased to support such provisions, or the opening paragraph could be largely removed and the policy left as criteria for when green spaces are proposed as part new residential development schemes.	Adoption of the emerging Local Plan is still someway off. The policy in the Neighbourhood Plan does not establish nor require certain standards to be met but instead refers to those established by WDC in the Open Space Study. This form of wording appears in the made Horam NDP. The Town Council does not consider it necessary to change the policy.
PAS-01 Transforming existing residential streets into green streets **Wording of the Project** This is aspirational and unlikely to be achieved, particularly for existing streets. Does this need to be in the NP, given it is already in the Design Guide?	Hailsham is an area deficient in open space and potential exists to increase this through the transformation of existing streets. Placing this in the Neighbourhood Plan enables communities to

Recommendation Remove the project from the NP.	come forward with proposals for change. The Town Council does not consider it necessary to remove the policy.
HaCF 7 Burial Space No comment.	Noted. No change required.
HaCF 8 Community infrastructure delivery **Wording of the Policy** In practice, Part 2 of this policy would be for the developer to agree with the LPA through a planning obligation, and we are not sure this adds anything beyond what we would normally expect on these issues. With regards to Part 3, it is for the LPA to determine what documents need to be submitted with a planning application as part of its validation criteria. Neither the emerging Local Plan, nor a Neighbourhood Plan should require documentation to be submitted by a developer as part of a planning application, and this should only be documented in the LPAs validation list. **Recommendation** It is suggested that Part 2 and Part 3 of this policy are removed or moved to supporting text.	Similar wording appears in the made version of the Hailsham Neighbourhood Plan (see Policy HAILS CF1) and, more recently, similar policy wording appears in the made Horam Neighbourhood Plan. Delivery of infrastructure is a major concern in Hailsham, as expressed through consultation, and existing policy is not working. It is therefore important to state this in the Plan. In respect of Part 3, the policy wording does not require not dictate that certain material must be submitted, but rather encourages applicants to do so. It does not therefore comprise additional validation criteria. The Town Council does not consider it necessary to change the policy.
HaTC 1 Town centre uses **Supporting Text** In paragraph 5.2 there is an issue with prematurity. The supporting text states that, 'The extent of the Town Centre (in draft form), as defined in the emerging Local Plan (and which is subject to change as this progresses to submission and examination), is	It is important that the policy for the town centre is linked to the most up-to-date town centre boundary so that it can have maximum effect. The text could state that the policy is based on

illustrated in Figure 7'. Figure 7 also includes our draft Primary Shopping Area boundary. WDC are in the process of updating our emerging Wealden Local Plan and these new boundaries are to be included in the Regulation 19 Local Plan in late 2026 as per the current LDS. Whilst the text now clearly refers to the Town Centre boundary being draft, it is still not considered advisable to show a draft boundary that is subject to change in Figure 7. Paragraph 5.8 talks to potential opportunities for the Town Centre which would be better located in the Design Guide. **Recommendation** Remove Figure 7 and instead refer in the text to the boundary as shown in the adopted Local Plan. That way if the boundary changes, the supporting text will not become out of date. It is suggested that paragraph 5.8 is moved to the Design Guide.	the boundary as mapped or as amended at a later date by Wealden District Council.
HaTC 1 Town centre uses **Wording of the Policy** There are elements of this policy that just repeat national policy and the emerging Local Plan policy TC1. Repetition is not necessary and we are unsure whether this policy is indeed needed on this basis in its current form. Reference to the Town Centre boundary from the emerging Local Plan is problematic, for the reasons as outlined above. **Recommendation** Remove repetition from the policy, specifically in relation to the NPPF and emerging Local Plan policy TC1. Instead of referring in	It is noted that the Examiner, in his Clarification Note, says that this policy takes a positive approach to the Town Centre and has regard to the NPPF. See above in respect of the town centre boundary.

the policy to the Town Centre boundary in Figure 7 (from the emerging Local Plan) it is suggested that reference is made to the adopted Local Plan.	
HaTC 2 Town centre design principles **Supporting Text** Paragraphs 5.22-5.24- As WDC previously stated at the Regulation 14 stage, the sentence which states 'This may include the retrofitting, refurbishment and upwards extension of buildings', will be heavily constrained by the character and appearance of the Conservation Area and the number of Listed Buildings. We note that a sentence has been added in on the wider context needing to be considered, but in our view, this should go further. **Recommendation** Along with paragraphs 5.22 and 5.24, changes within the designated conservation area or within its setting will need to be supported and justified by a more thorough heritage led strategy to preserving and enhancing the historic environment. Changes need to be informed by an understanding of spaces and how the town centre has developed and this should lead the identification of sites within the town centre for redevelopment and then to guidance on how these sites could provide a positive enhancement of the historic environment. Alterations to buildings within the Conservation Area will need to reflect a heritage led strategy. This needs to be reflected in the supporting text or within the policy itself.	The Town Council is happy to include a reference at the end of para 5.22 to the need for proposals to be underpinned by analysis of heritage assets and which may, as appropriate, include a heritage strategy. Part 2 of the Policy addresses heritage matters and was specifically inserted at an earlier stage of the Plan-making process following feedback from Wealden.
HaTC 2 Town centre design principles	

Wording of the Policy Part 1- Given the length of this NP, where these points are already in the Design Guidelines we question whether they need to be repeated in this policy. Part 1c- We are not convinced 'balconies' are appropriate within the Conservation Areas and are not a common feature - if a feature at all - at present. Part 1f- This is a land ownership issue rather than a planning issue per se. It could state that the Plan wishes to see town centre development take place comprehensively, which would be more positively worded, or to ensure that development opportunities are not lost through 'poor' design. General- We also feel that there does not need to be a separate part 1 and part 2. As they are integrated, we consider there is a conflict between the two parts. There are a few conflicting elements to this policy which will be difficult to incorporate into a design that would preserve or enhance the character and appearance of the Conservation Area. It is too prescriptive in our view. **Recommendation** It is suggested that reference to balconies is removed at criterion 1c. We also recommend the removal of part 1f or rephrase this in line with WDC comments.	The policies in Part 1 are carried over from the made version of the Neighbourhood Plan (see Policy HAIL TC2). They are important to shaping and informing good design in the town centre. Simply saying that these should be had regard to (if they were moved to the Design Guide and Code) would weaken the intent. The importance of the policy was highlighted through consultation, with respondents noting the need for improvements to the quality of the town centre. In terms of Part 1c, the conservation area is not the same as the town centre. Opportunities for change and development outside the conservation area may be appropriate for inclusion of balconies, particularly should higher density apartment type development come forward (e.g.: through intensification of car park sites) where private open space is required for each dwelling. In terms of Part 1f, comprehensive development (including that previously explored through the now withdrawn Aspires scheme) could result in the creation of large structures which do not provide flexibility or adaptability over time, replicating existing issues in the town centre. Where change takes place this should support a finer grain pattern of development that responds to the town urban fabric and which can adapt over time, without the need for further major intervention. The Town Council does not agree that there are any conflicting elements to the policy. There is plenty of scope for proposals to come forward within the framework established by this policy,

WDC believes that this policy should be shorter and more concise, with proposals required to reflect an appropriate scale, massing, design, articulation and floor to ceiling to street ratio based on immediately surrounding development. Part 1 should be used to reaffirm that proposals need to comply with the Design Guidelines rather than repeating the guidance.	which is seeking to establish a best practice approach relevant to the local context. Other than where the Examiner has commented upon Part 3 of the Policy, the Town Council does not consider it necessary to change the policy.
Project TCM-01: Town Centre Concept Masterplan No comment.	Noted. No change required.
Project TCM-02: Place Branding Strategy No comment.	Noted. No change required.
HaTC 3: Safety by design **Wording of the Policy** Part 1 of the policy refers to having regard to 'the setting and character of the Conservation Area and other heritage assets'. We would question whether this policy, which relates to safety by design, needs to refer to the setting and character of the Conservation Area and other heritage assets. Draft policy HaTC2: Town Centre design principles 2c already refers to avoiding any adverse effects on the Conservation Area, other heritage assets or their settings. **Recommendation** Remove reference to heritage assets from part 1 of this policy.	The text in respect of heritage and conservation was added following receipt of comments on an earlier draft of the NDP from WDC which did not make specific reference to heritage. Whilst it is agreed that heritage is addressed elsewhere (including at national level, and thus perhaps not needed here – as initially considered by HTC), the text has been retained. The Town Council is happy to be advised by the Examiner as to whether the text is required.
HaTC 4 Shopfront design and signage **Wording of the Policy**	

This draft policy is long and repeats and on occasion conflicts with our own draft policy on shopfront design and signage as presented in the draft Wealden Local Plan (March 2024), which will be updated as part of the Regulation 19 process. It also repeats and on occasion conflicts with our design guide as existing (which is also being updated). There is a question as to whether this policy is needed in view of the emerging policy and design guidance. **Recommendation** To shorten and revise the policy to better conform with our own emerging policy and Design Guide. In addition, there are also listed buildings within the town centre which have shopfronts, so there will be other heritage issues s other than the Conservation Area.	A shopfront design policy was included in the made Neighbourhood Plan (HAIL TC5). This has been expanded upon and taken forward in the Neighbourhood Plan, providing greater clarity on how it should be applied. The current design guide is not policy and does not have specific detail in respect of shopfronts. The emerging design guide remains just that: it has not been published for consultation and will not comprise policy. It is important that this policy is carried forward into the Neighbourhood Plan and can contribute towards improvements to the overall look and feel of the town centre. The policy wording already recognises that there may be other heritage assets to consider beyond the Conservation Area. The Town Council does not consider it necessary to change the policy.
Project SHS-01: Shopfront Improvements No comment.	Noted. No change required.
HaTC 5 Public realm, gateways and wayfinding **Wording of the Supporting Text** Paragraphs 5.45- 5.48 - The Council owns the South Road car park; Tesco's own their car park and there will be other owners along North Street. We question whether discussions taken place these owners and whether the installation of these gateways is realistic?	These are included as identified opportunities. They do not require change to take place, nor do they impose any burdens on landowners. They should be seen as enabling text (as part of an enabling policy) which seeks to influence 'better' should opportunities for change come forward at some point in the future.
HaTC 5 Public realm, gateways and wayfinding **Recommendation**	

To remove text around Gateways if no firm action has taken place with landowners on these assets. It would also shorten the Plan. **Wording of the Policy** Part 1-PRG 01 is a project and should not be referred to in the policy. It is suggested that Part 3 would work better as part of the following project, PRG-01. There needs to be some realism shown, particularly if landowners are unaware of these proposals. Draft policy HaTC2: Town Centre design principles 2c already refers to avoiding any adverse impacts on the Conservation Area, other heritage assets or their settings. **Recommendation** Remove reference to PRG-01 in part 1 of the policy. Move Part 3 of the policy to project PRG-01. Remove part 5 of the policy.	This policy should be seen as an enabling policy. Although there may not be a specific opportunity or proposal at this current time, the policy is seeking to capture and influence those opportunities that do come forward over the life of the plan and which can contribute to the quality of and improvements in the town centre. Signposting to project PRG-01 is to be retained. It is included to help support delivery of wider ideas should the opportunity for change and development come forward. There is no requirement for these ideas to be delivered (the wording says 'should'), though they should be considered as appropriate to help inform coordinated change across the town centre. It is unclear why part 5 is to be removed. Previous advice from Wealden in comments received earlier in the process specifically requested that this text be added to the policy.
Project PRG-01: Town Centre public realm improvements **Wording of the Project** Parts of this project read more as policy wording rather than a potential project. For example, 'opportunities should be taken that contribute to the greening of the urban environment' or 'opportunities should be taken that improve the quality of the pedestrian experience'.	The Town Council recognises – as with all projects – that further work will be required before they can be delivered. All will require further review, study and consultation, and may evolve over time, with the detail dropping out of that process. This may include the need for an associated heritage strategy or similar depending on

Recommendation Rephrase those parts of the project that give directions as to what should be done. This project will need to be informed by a heritage strategy as it progresses, to ensure that appropriate improvements are proposed - not just to the Conservation Area and its public realm, but how this may impact Listed Buildings too. There is much potential to declutter and improve the public realm and preserve and enhance heritage assets - significance and setting.	location. This will be determined on a case-by-case basis. There is no need to change the Project.
HaTC 6 Public art **Wording of Policy** This policy may be better positioned as design guidance rather than policy. Alternatively, it could be amalgamated into the previous policy, particularly if elements are removed as WDC suggest. Whilst it is noted that you have adapted the wording of part 1f, following our comments at the Regulation 14 stage to state 'where appropriate', it is considered that it is still outside the remit of a neighbourhood plan to state that a management plan should accompany an application. This will most likely be determined by condition or a legal agreement that will be determined by the LPAS with the applicant on a case-by-case basis. **Recommendation**	This policy is distinct from the previous policy and should not be amalgamated with it (nor removed to the Design Guidelines). That policy primarily relates to streets and spaces whereas this policy has a different focus on specific features and thus different principles apply. The Town Council does not consider it necessary to move the policy. However, it is happy for the Examiner to advise on the status of Part 1f.

Consider amalgamating this policy with the previous policy or moving it to the Design Guide and Code. Remove part 1f or move to supporting text.	
HaTC 7 Roofscape **Wording of Policy** Parts 1a and b and Part 2- These proposals can be supported, but not required through the planning application process, given that no viability evidence is provided as part of the Hailsham NP. **Recommendation** Change the wording of parts 1 and 2 to support, rather than requiring them as parts of proposals.	The policy text does not require nor dictate that these criteria must be met. It uses the word 'should' to encourage and support such aspects where they are proposed. The Town Council does not consider it necessary to change the policy.
HaTC 8 Town centre parking **Wording of Supporting Text** Paragraph 5.68-This paragraph states that 'Development of existing surface car parks to the rear of the High Street could help meet windfall housing targets for development in Hailsham, support provision of new town centre uses, and enable improvements to the quality of the centre and visitor experience, repairing the urban fabric of the town'. We do not feel that this sentence is required given that it is not linked directly to a policy and windfall development will be considered on a site-by-site basis on its own planning merits by the District Council. **Recommendation** Remove the final sentence of paragraph 5.68.	The Town Council is unclear what the concern is here. There is an extensive network of surface parking in the town centre which is land hungry and where opportunities could be taken to make more effective use of the land, brining benefits to the town centre. Indeed, the now withdrawn District Council-led Aspires project looked at such opportunities. The sites are not currently allocated and, factually, would thus constitute a form of windfall. There is no reason to remove this sentence form the Neighbourhood Plan.
HaTC 8 Town centre parking	

Wording of the Policy Part 3a- It is not clear how the statement 'The proposal does not result in unnecessary traffic movement to, in and around the town centre' could be demonstrated by the applicant or what is meant by this. Once part a is removed this policy largely relates to the design of a potential multi-storey car park. Consideration should be given to moving this to the Design Guide. **Recommendation** Remove part 3a of the policy. Consider moving part 3 to the Design Guide.	Wording in Part 3a is caried over directly from the made Neighbourhood Plan, and which has formed part of the development plan since July 2021. The Town Council does not agree that the remainder of Part 3 should be moved to the design guidelines document, for the reasons previously set out. Furthermore, not all of the criteria in Part 3 are design related in any event, and where they are, they are crucial to ensuring that provision is suitable designed. Many of these elements were incorporated in the policy in the made version of the Neighbourhood Plan.
HaHD 1 Housing design and character **Wording of the Policy** At Regulation 14, WDC commented that part 2 might be better positioned within the Design Guide. This would serve to shorten the policy and avoid duplication. **Recommendation** Move part 2 to the design guide.	The Town Council disagrees. These are all important design criteria that will help shape better quality design and development in Hailsham. The importance of this approach was highlighted through consultation, with concerns expressed as to the impact of new development on the town (and many noting the impacts of development that has taken place). Moving this part of the policy to the Design Guidelines will diminish its weight and effectiveness. The Town Council does not consider it necessary to change the policy.
HaHD 1 Housing design and character **Project DC-01: Architectural variety and innovation.** **Wording of the Policy**	

It is not clear how this project will work. Will Hailsham Town Council approach developers directly regarding the first sentence? This project does not appear to be realistic. The second sentence does not seem to relate to a project as such and in fact the use of masterplans on sites over a certain size is something that we are considering as part of the emerging Local Plan design policies. **Recommendation** Remove this project from the NP.	The Town Council does not understand the reluctance of the District Council to explore alternative approaches to design and development which delivery a high quality of design and development. Including this as a project within the Neighbourhood Plan raises awareness of the issue with developers and their designers. Although the emerging Local Plan may support masterplanning for larger sites, it does not address the question of design quality, interest and variety. This is where the Neighbourhood Plan expands on matters. The text is clear that the project applies to larger sites which may involve multiple phases or outlets. This approach links back to the National Design Guide and its support for variety across development. The Town Council does not consider it necessary to change or remove the project.
HaHD 2 Well-integrated residential development **Wording of Supporting Text** 6.15- The definition of windfall development in the glossary does not correspond with the NPPF (December 2024). **Recommendation** It is suggested that the definition of windfall development in the NPPF is used, namely 'Windfall sites: Sites not specifically identified in the development plan'.	The Town Council is happy to amend the definition.
HaHD 2 Well-integrated residential development **Wording of the Policy** The first paragraph of part 5 sets out a strategic approach to site allocations, which the NP is not proposing. Therefore, site allocations are within the remit of emerging Wealden Local Plan.	The Hailsham Neighbourhood Plan does not include allocations but does include policies that seek to influence the quality of development and design. This is one of those policies. The

A-E in Part 5 are in effect setting out validation criteria, which the Hailsham NP is unable to do. In the emerging Local Plan, we have a policy on both master planning and on ensuring comprehensive development. Part 5 is therefore duplication of an emerging planning policy and is being considered at the district level. **Recommendation** Remove part 5.	current adopted Core Strategy and saved development management policies do not sufficient address the need to a comprehensive approach to planning and development for larger sites. Equally, the emerging Local Plan does not do this adequately. This has resulted in a form of development around Hailsham that is based on the red line boundary, resulting in a series of inward looking development areas that are poorly integrated with each other and the existing built form. The Neighbourhood Plan seeks to put in place principles that influence a better approach to development. This is expanded upon in the associated Design Guidelines. It is to be noted that the made Hailsham Neighbourhood Plan includes similar principles in Policy HAIL SD1. These are being carried forward into the made Plan, reflecting the Health Check and wider analysis undertaken that emphasises the importance of taking such approach. Removal of this part of the Policy will diminish the Plan and its effectiveness. The Town Council does not consider it necessary to change the policy.
HaHD 3 Sustainable design and construction **Wording of Supporting Text** Paragraph 6.23 states 'It is anticipated that the Future Homes Standards will be implemented during 2025'. **Recommendation** Update paragraph 6.23 with the latest information on the Future Homes Standard.	The Town Council is happy to update the reference to the status of the Future Homes Standard.
HaHD 3 Sustainable design and construction	

Wording of the Policy. With no viability evidence specific to Hailsham provided, much of this policy will come under scrutiny by prospective developers. Our own emerging Local Plan has been assessed using a whole plan viability assessment and tested through this process. However, even for us as the LPA, this has not been examined or agreed through the Local Plan process yet. Part 1g-If the TC wishes to use this figure, an evidence base to support this is needed, which is not present currently. The figure in the government's EIP is a proposed action only. WDCs own draft Local Plan policy CC6 requires a target of 110 l/p/d based on enhanced Building Regulations standards at that time. The Government are currently reviewing these enhanced building regulations standards. This figure would need to be viability tested and even for our own Local Plan, this figure has not been tested through an examination process at this stage and could be subject to change. **Recommendation.** It is suggested that this policy is either removed or amended to just consider design and/or supporting developers that do take these actions. This water efficiency standard in Part 1g should be removed from the policy in its entirety as this has not been tested in viability terms.	It is to be noted that the policy does not require or dictate that any of the principles set out in the policy are met, with the policy supporting and encouraging developments that meet high standards, including in the way that development is designed. It is recognised that some of these aspects might be subject to viability and, to this end, the Town Council is happy to add the words 'subject to viability' is similar at the end of the opening para of Part 1 of the policy. Part 1g of the Policy is a direct response to the Environmental Improvement Plan and which applies in areas of serious water stress, which includes Hailsham. Irrespective of the above, the Examiner has asked a separate question about this policy to which the Town Council has responded and will be guided by the Examiners report.
Project DR-01: Design Review **Wording of Supporting Text**	The made Neighbourhood Plan currently includes a project in respect of Design Review (see Aspiration HAIL D1). Much of the

6.35- WDC does not currently have a Design Review panel and are unlikely to do so in the foreseeable future. **Recommendation** It is recommended that this reference to Wealden District Council is removed. **Wording of Project** It is not clear how this project would be realised. WDC do not currently use a Design Review Panel. It is our decision whether to have a policy or process in place to use a panel and currently we do not. **Recommendation** It is suggested that this project is removed.	wording from that has been carried over into the review. Irrespective of whether the District Council has a review panel or not this remains an important aspiration, particularly given the quality (or lack of) of development that has taken place in recent years. The District has the ability to draw upon independent design review panels for major schemes. The supporting text makes clear that it will be for the District Council to determine whether the need for design review is triggered. It is recognised that they may not do this. However, inclusion of this as a project in the Neighbourhood Plan provides the scope and opportunity for review to be required and to satisfy the NPPF which encourages use of tools such as design review to improve the quality of development. The Town Council does not consider it necessary to change the policy.
HaHD 4 Housing mix **Wording of the Supporting Text** 6.42- Without figures, dates etc. the first sentence is of limited use given how many existing homes there are in Hailsham. **Recommendation** It is suggested that this sentence is amended to concentrate on using the evidence, as you have done further on.	Comments at the regulation 14 stage said inclusion of this sentence was 'meaningless'. The wording has now softened. Irrespective of that, the Housing Needs Assessment undertaken in support of the Neighbourhood Plan does indeed show that, between 2011 and 2021, the stock of 2-4 bed homes grew significantly in Hailsham.
HaHD 4 Housing mix **Wording of the Policy** Part 1- seeks to prescribe a specific housing mix by requiring the majority of new homes to comprise 1, 2 and 3-bedroom dwellings. Whilst the supporting evidence may identify a need for	It is quite common for Neighbourhood Plans to include a policy on the preferred housing mix. Indeed, Housing Needs Assessment formed one of the technical support programmes

smaller homes, there is no evidence that this requirement has been subject to viability or deliverability testing. Housing mix requirements should retain sufficient flexibility to respond to site-specific circumstances, market demand, viability considerations and changing housing needs over the plan period. The policy should therefore be amended to support, rather than require, the housing mix identified in the Hailsham HNA and HNS, with all proposals considered on a case-by-case basis having regard to the latest available evidence. Alternatively, this criterion should be deleted. Part 2 - seeks to prioritise the delivery of social rent and affordable rent homes. Whilst this reflects evidence of local housing need, the policy should retain sufficient flexibility to respond to site-specific circumstances, viability considerations, funding arrangements and the requirements of the strategic development plan. The policy should therefore be amended to support the prioritisation of social and affordable rent products where appropriate rather than requiring them in all circumstances. Part 3- This part of the policy repeats our affordable housing policy in the emerging Local Plan. Part 7- It is likely that many elements of part 7 will not require planning permission, so is this part of the policy required? **Recommendation**	administered through Locality and informed production of numerous Neighbourhood Plans elsewhere. By way of example, the Horam Neighbourhood Plan, which the District Council refers to, includes such a policy. This is underpinned by the HNA prepared. No viability work was undertaken as part of this. That policy states that proposals should comply with the preferred mix where practicable. The Hailsham policy takes a similar approach. Equally, and in Part 2, the Policy uses the word 'should'. This does not mandate or require delivery in line with the policy or in every circumstance, but expresses a preference that should ideally be met. In terms of Part 3, the emerging Local Plan is still someway form adoption. Part 3 should thus be carried forward so that it can be used to inform development proposals as and until the Local Plan is adopted. Part 7 is a land use policy. It clearly states that flexible housing types will be supported where proposed and explains the form these may take. The Town Council does not consider it necessary to change the policy.

We recommend that part 1 and part 2 of the policy is amended to support rather than 'should' owing to evidence of viability and specifically paragraph 35 of the NPPF (December 2024). Alternatively, this criterion should be deleted. We suggest Part 3 of the policy is removed. We recommend the removal of part 7. However, in the event it's retained we would suggest replacing 'independently' with 'together', thus not supporting independent dwellings in all situations, including in the countryside, which are generally not supported.	
HaHD 5 Self and custom build homes **Wording of the policy** Part 1a and 2- It is not for the NP to set validation criteria for WDC. **Recommendation** It is suggested that part 1a is removed and the reference in part 2 to plot passports is removed.	This policy builds on Policy HAIL D4 of the made Plan which encourages production of plot passports. The made Plan does not establish validation requirements and nor does the review. The word used in the policy is 'should', not 'must'. It encourages production but does not require them. The Town Council does not consider it necessary to change the policy.
HaHD 6 Street types, design and hierarchy **Wording of the Policy** Part 2 sets validation criteria, which a NP cannot do. **Recommendation** Remove and 'details of these should accompany planning application material' from Part 2.	Part 2 does not require any additional material to be submitted but instead suggests it 'should' be. This encourages applicants to submit material to demonstrate how they are proposing to deliver good design, but does not dictate that they 'must' submit this material. The Town Council does not consider it necessary to change the policy.

HaHD 7 Parking in new residential development **Wording of the Policy** At the Regulation 14 stage, WDC queried whether this policy is required, given that ESCC set their own parking standards and are the local highway authority and WDC have a draft policy on parking provision in the emerging Local Plan. Part 2 could also be covered in the Design Guide. **Recommendation** We recommended the removal of this policy or at least moving part 2 to the Design Guide.	The parking standards established by ESCC relate primarily to numbers and space, as opposed to design. The location of parking is an important design consideration and has a major bearing on the quality of the street environment, as well as encouraging walking and wheeling. The emerging Local Plan does not go far enough in addressing the challenges. The design and location of parking provision was included in the made Plan but the health check undertaken suggested that further detail was required to influence a better quality of design. Given the importance of parking and the design of this, it is entirely appropriate to retain it as a policy in the Neighbourhood Plan. Removing this will limit the weight and effectiveness of the policy and the ability for the Neighbourhood Plan to influence good design (as per its overarching objectives). The Town Council does not consider it necessary to change the policy.
HaM 1 Active and healthy travel No comment.	Noted. No change required.
Project MHT-01: Crossing the A22 **Wording of the Project** At Regulation 14, WDC stated that it is not clear here whether this project has been discussed with ESCC and whether it is feasible. **Recommendation** As no feasibility work has been carried out prior to this project being included in the NP and has not been subject to this consultation, we suggest that this is removed from the NP.	The responses to the Regulation 14 comments (as set out in the Consultation Statement) make clear that the ideas has been discussed with the County Council. The County Council did not raised any concerns with this project in their Regulation 16 responses.

	The idea has also been discussed through public consultation events and strongly supported. It is recognised that further feasibility work is required before the scheme can progress. Indeed, this is the position with most projects – not just in the Hailsham Neighbourhood Plan but in other Neighbourhood Plans too. The Town Council sees no reason why it should be removed.
Project MHT-02: The Hailsham Country Line **Wording of the Project** At the Regulation 14 stage, WDC stated that it is not clear here whether this project has been discussed with ESCC and whether it is feasible. The last sentence of the project states 'In addition to the project outlined above, proposals that seek to connect gaps in the walking, wheeling and cycling network across Hailsham will be supported' which is akin to policy wording rather than a project. **Recommendation** As no feasibility work has been carried out prior to this project being included in the NP and has not been subject to this consultation, we suggest that this is removed from the NP. Move last sentence to a policy.	As above, the project has been discussed with the County and has also been subject to public consultation, with strong support expressed for this. The County did not express any concern about this project in their Regulation 16 response. It is acknowledged that further feasibility study will eb required. This should not preclude it from being identified as a project to explore further with partners. As above, there is no good reason for it to be removed from the Plan, particularly as it supports wider aspirations at the national and county level in respect of active travel and delivery of supporting infrastructure. The Town Council does not consider it necessary to remove the last sentence of the project but is happy to do so.
HaM 2 The Cuckoo Trail No comment.	Noted. No change required.
HaM 3 Public Transport **Wording of Supporting Text**	The Town Council is unclear why the text should be removed. Delivery of sustainable and active travel infrastructure is central to the vision for the town as expressed through the ten-minute

Paragraph 7.25- 'In these circumstances new routes within residential developments should incorporate sustainable, safe, and effective infrastructure that supports bus use'. As the development is coming forward through the Local Plan is this not a consideration for the Local Plan itself alongside infrastructure providers such as East Sussex County Council who are working on its Local Cycling and Walking Infrastructure Plan (LCWIP)? **Recommendation** Consider removing the sentence in paragraph 7.25 regarding new bus routes as a matter for the local highway authority in consultation with the LPA.	town concept. Recent developments have been unsuccessful in terms of delivering on this, being designed around car-based layouts and forms which do not cater for alternative modes. The emerging Local Plan does not include allocation policies for all growth areas and, where it does, does not look at these holistically, risking non-delivery of supporting infrastructure, or infrastructure that is not joined up. The Hailsham Neighbourhood Plan includes such text to support and encourage a form of development that promotes walking, cycling and use of public transport. The Town Council does not consider it necessary to change the text.
HaM 3 Public Transport **Wording of Policy** Part 2- See the Examiner's comments on the Horam NP. He moved the detail of the distances to bus stops to the supporting text as he did not consider it to be a land use policy. **Recommendation** Move the detail of the distances to the bus stops to the supporting text as per the adopted Horam NP.	The Town Council disagrees with the distances being removed from the policy. Although the Neighbourhood Plan is being tested against the 2024 NPPF, the new NPPF makes numerous references to reasonable travel times. For bus routes and stops a 400 metre / five minute walk time to these is a recognised industry standard. In promoting and supporting sustainable forms of development, it is important these references are retained in the policy. The Town Council does not consider it necessary to change the policy.
Project PT-01: Bus Service Improvements No comment.	Noted. No change required.
HaM 4 Community mobility hubs **Wording of the Policy** Figure 21- some of the potential mobility hub locations are outside the Neighbourhood Area within Hellingly Parish and	The Plan is a concept which is intended to show an integrated network of hubs and which support sustainable and active travel

therefore outside the remit of the Neighbourhood Plan which is bounded by the parish boundary. At the Regulation 14 stage, WDC suggested that these are removed, particularly those potential hubs that fall outside of the Neighbourhood Area. Whilst Figure 21 has now been clearly labelled and differentiates between those in the parish and those in Hellingly we still do not agree that the NP should show sites in an adjoining parish. In addition, at the Regulation 14 stage, we questioned whether this would be better suited as a project rather than a policy? It would be unlikely that anyone other than the Town Council or the County Council would be proposing to develop these hubs. **Recommendation** Remove those potential hubs that fall outside of the Neighbourhood Area from Figure 21. Change this policy to a project and move part 2 to the Design Guide and Code.	patterns. The Policy does not seek to direct where facilities might be located outside the Town Council boundary. However, the location of facilities within the boundary does need to be considered in terms of the direction of growth and how and where facilities will have greatest impact. The Town Council does not agree that this needs changing. As the comments say, the caption makes clear how this should be interpreted. Equally, the Council does not agree that this should be removed as a policy. The delivery of such hubs is becoming more common and similar policies feature in other Neighbourhoods Plans that have been recently made elsewhere. Hubs may be delivered by specialist operators and even if they are to be delivered by the Town or County Council it would still be appropriate to have policy in place that directs these to appropriate locations and which establishes key design criteria that should be followed.
HaM 5 Electric vehicle charging points **Wording of Supporting Text** Paragraph 7.45- the word draft has been added in before Policy HAIL AQ1 of the made neighbourhood plan. However, the policy is not draft. Paragraphs 7.49- 7.53- This section on street maintenance deals with non-land use issues. **Recommendation** Remove the word 'draft' from the start of 7.45.	Word 'draft' to be removed from the start of the policy. Paras 7.49-7.53 are purposely included in the Plan in response to the volume of comments raised about street maintenance through the consultation exercise. The Town Council recognises that there is little the Neighbourhood Plan can say in policy terms about street maintenance, but it is important to signpost the responsibilities for this, and how and where the public can report issues. Respondents to earlier consultation exercise will be

It is suggested for the sake of brevity, that the section on street maintenance is removed.	expecting to see reference to such text. The Town Council does not consider it necessary to change the text.
HaGI 1 Biodiversity **Wording of the Supporting Text** Paragraph 8.7 states that 'Exemptions include, but not limited to, householder applications, and self or custom build schemes of less than ten homes and on a site no larger than 0.5 hectares'. This will need to be amended as whilst householder applications are still exempt, self and custom build are not. The exemptions to BNG have recently changed in August 2026 also. Paragraph 8.14 states 'Opportunities for off-site biodiversity net gain may potentially present themselves through the diversification and remodelling of existing streets and spaces, introducing green infrastructure into these (see, for example, Projects PAS-01, PRG-01 and SGI-01), and through the diversification of existing green spaces which are currently little more than areas of mown grass (see, for example, Figure 27)'. Introducing green infrastructure into existing streets as outlined in paragraph 8.14 is more related to general ecological enhancement than providing off site BNG compensation, which would involve legal agreements on land or registering the site as a habitat bank. **Recommendation** Remove reference to self and custom build from paragraph 8.7 and update as per the national government guidance produced in August 2026.	The Town Council is happy to amend para 8.7 to refer to the most recent guidance eon exempt developments. In terms of para 8.14, the Town Council is concerned that on-site delivery of biodiversity net gains may not be possible in Hailsham (particularly as the emerging Local Plan establishes a very high requirement for 20% net gain) and is concerned that, if this is the case, gains may not be made in Hailsham. Scope does exist for improvements locally and these should be supported in the first instance. Indeed, the Local Nature Recovery Strategy (LNRS) supports the creation of joined-up wildlife rich spaces in rural and urban areas, and seeks to bring nature into everyday life. Opportunities that are taken to diversify and introduce new green infrastructure into streets and spaces will help contribute towards delivery of net gain and the aims set out in the LNRS (to which Neighbourhood Plans are now required to have regard to).

It is suggested paragraph 8.14 is reframed as offsite BNG may not be applicable on streets[1].	
HaGI 1 Biodiversity **Wording of the Policy** The first sentence of Part 1 of the policy is not required where it states 'Other than where exempt by national guidance, proposals for development must secure a minimum biodiversity net gain of 10% (or greater, subject to minimum requirements established through the emerging Local Plan)'. This is set out in national legislation. Part 1b states 'within the Neighbourhood Plan Area' This does not comply with the legislation, in particular the Statutory Biodiversity Metric, which specifies LPAs and National Character Areas and does not consider the parish level. Part 1c- The process is already set out in legislation. Also, it refers to delivery in the Plan Area which goes beyond what the legislation states. It is also not clear if this refers to statutory credits or habitat bank units? Part 5- Can some or all of this be moved to the Design Guide? **Recommendation** Remove first sentence of part 1 and restructure the policy.	The Town Council is happy to remove part 1a should the Examiner agree. In Part 1b, reference to the Neighbourhood Plan area is made as the risk is that net gains will be made off-site and in areas far removed from the development sites and indeed the Parish, or, worse, is not delivered at all. The case for this is made in research undertaken by the Wildlife and Countryside Links as referenced on para 8.15 of the Neighbourhood Plan which states that delivery of net gains is well below that expected by the Government. Securing these on or in proximity of the site will thus be important and help contribute to wider aspirations set out in the LNRS. The comment suggests that the words 'where possible' are added in Part 1b. These words already appear at the end of Part 1 and do not therefore need repeating. Part 5 represents important principles that should be clearly embedded in policy and which would be weakened if removed and applicants asked 'to have regard' to these.

[1] Make off-site biodiversity gains as a developer

1b- 'Where possible' could be added at the end of the sentence to allow more flexibility. It is suggested that part 1c is removed. It is suggested that part 5 is moved to the Design Guide.	
HaGI 2 Access to green and blue infrastructure No comment.	Noted. No change required.
SG1-01: Street Greening No comment.	Noted. No change required.
HaGI 3 Diversifying and improving existing amenity green space **Wording of Policy** There is some duplication between this policy and HaCF6: Play and amenity space. **Recommendation** It is suggested that the two policies HaGI 3 and HaCF6 are combined.	These are two separate policies dealing with separate matters. HaGI3 is about the diversification of existing space, making better use of this and introducing additional green space typologies. Policy HaCF6 is about the provision of new green space and how this should be well integrated with new development. They are sufficiently distinct and do not require amendment.
HaGI 4 The Pevensey Levels No comment.	Noted. No change required.
Project PL-01: Interpretation Boards No comment.	Noted. No change required.
HaGI 5 Flood Risk and Sustainable drainage **Wording of the Policy**	

Part 1- 'the design of should be'. This currently does not make sense as worded. Part 1 is largely about the design of SuDs and water tanks. **Recommendation** Adjust the wording of the first sentence so that it is clear. It is suggested that Part 1 is moved to the Design Guide.	To be rephrased as 'the design of <u>these</u> should be…' The Town Council disagrees that part 1 should be moved to the Design Guidelines. These are important design features that have a considerable impact on the quality of new development and integration of this with the built and natural environment. Removing this Part of the policy will reduce the weight of the plan and its ability to influence good design and development. The Town Council does not consider it necessary to change the policy.
HaGI 6 Paving of front gardens No comment.	Noted. No change required.
Project FG-01: Reinstating front gardens. No comment.	Noted. No change required.
Next Steps This section at paragraph 9.8 still refers to this as a draft version of the Plan. This whole section needs to be updated.	Noted. Text to be updated.
Supporting Documents **Hailsham Neighbourhood Plan Ideas: Community Mobility Hubs.** The concept plan shows potential hubs in parishes outside the Neighbourhood Area. As with our comments on the corresponding policy and map in the Main Plan, we suggest amendments here to so that the document and concept plan must only consider potential works within the Neighbourhood Area.	The plan is, as noted in the comment, a 'concept'. This is included to show how and where the facilities might be provided such that they provide a logical and connected network rather than being considered in isolation. It is acknowledged that the Neighbourhood Plan cannot establish policies or aspirations for land outside of the Plan area. It does not seek to do this but does seek to plan in a sensible manner. No change is required.

Hailsham Town Centre: Concept Masterplan. We suggest this document is removed from the NP. It is confusing for residents as it relates to works that are not proposed as part of this Neighbourhood Plan. Figure 1 also includes a town centre boundary from the draft Local Plan which is subject to change.	The Town Council disagrees. This has helped establish ideas for the future of the town centre and projects within the Plan, including those in respect of street greening and partial pedestrianisation. The emerging Local Plan says very little (if anything) about the future of the Town Centre. Within this vacuum the Town Council is seeking to be proactive about shaping improvements. Given the District Council's own 'Aspires' project was cancelled the Town Council hopes to work with partners to help shape change. The concept masterplan is the first step in this process.
Town Centre Analysis and Ideas Again, this document contains proposals for the Town Centre which are not being brought forward as part of this Hailsham NP, such as a multi storey car park. It is suggested that this document is restricted to analysis and case studies rather than ideas that are not going to be brought forward as part of the Hailsham NP.	This is a background document. The Neighbourhood Plan uses this as appropriate to inform policies and projects. Not everything in the material is taken forward in the Plan. This is an appropriate use. There is no need to change the document.
Town Wide Analysis and Ideas. It is suggested that this document is restricted to analysis and case studies rather than ideas which are not being brought forward as part of the Hailsham NP. Any maps should not show draft site allocations from the emerging Local Plan which are still subject to change.	All maps included were prepared in line with the available version of the Local Plan at that particular date. It has been used to help inform ideas for inclusion in policies in the Plan. It is a background document and does not inform policy itself. There is no need to amend this.

Wealden District Council Comments on the Hailsham Desing Guidelines - Regulation 16 Consultation

WEALDEN DISTRICT COUNCIL REG 16 COMMENTS	HAILSHAM TOWN COUNCIL RESPONSE
Overall Observations The Hailsham Design Guidelines (HDG) document is to be commended for focussing on those areas where design guidance has been identified during the consultation as being required, such as town centres, new residential development, smaller sites and retrofitting of existing streets. It does not seek to reproduce good practice design principles set out elsewhere, which is supported. The signposting to other documents in the green boxes works well and avoids duplication with external guidance and documents. It should also be commended for its principles for a safe, pedestrian friendly, inclusive environment and its guidance on creating safer gender and age inclusive places. Our comments at the Regulation 14 Stage regarding the format of the document (it was previously titled Hailsham Design Guide and Code despite not all the stages of coding having been carried out) have been considered by Hailsham Town Council (HTC) and relevant adjustments have been made. We confirm that the document works better as Design Guidelines.	Noted. No change required
Duplication As stated in our comments on the main Neighbourhood Plan, there is some duplication between the main Plan document and this Design Guide. There is no need for the Neighbourhood Plan to repeat criteria in the Design Guide and vice versa, and a reference to the relevant part of the Design Guide could be made instead in the policies. For example, there is guidance on creating well	See our response set out in the main body of this clarification note.

integrated developments, amenity green space, natural green space and allotments and then separate policies in the Neighbourhood Plan on well-integrated residential development, diversifying and improving existing amenity green space, green and blue infrastructure and allotments.	
Foreword In the foreword it states, 'subject to any future reorganisation of Council structures, parts of the document, such as those in respect of well integrated residential development, variety and interest, may be relevant to future growth in Hellingly too'. The HDG must only be based on the Hailsham Town Council designated neighbourhood area. Hellingly Parish Council are undertaking a review of its own NP and already have a Neighbourhood Plan in place. It is recommended that this paragraph is removed from the Design Guidelines.	The Town Council is of the view that this sentence should be retained as the scale of growth that has taken place has effectively led to the merger of Hailsham with large parts of Hellingly. Development is boundary-blind and good principles in respect of well-integrated development should apply irrespective of where located.
Figure 1 This figure has been added since the Regulation 14 consultation on the Hailsham Neighbourhood Plan Review to show where the Town Centre guidelines apply. The boundary is taken from the emerging Local Plan Regulation 18 mapping. As we stated in our comments on the Neighbourhood Plan, WDC are in the process of updating our emerging Wealden Local Plan and these new boundaries are to be included in the Regulation 19 Local Plan in late 2026 as per the current LDS. It is not considered advisable to show a boundary that is subject to change in Figure 1.	The Design Guidelines include a section that specifically relates to the Town Centre. For reasons of clarity this needs to be defined, so that applicants and design makes know to which area the guidelines apply. The map was inserted following comments from WDC at the Regulation 14 stage which questioned how and where the guidelines should be applied. In the absences of this it is unclear how the District Council would wish to see the extent of the town centre defined. The boundary is well established. The Town Council sees no reason for this to be changed or removed.
Figure 2	

This has been added since the Regulation 14 consultation on the Hailsham Neighbourhood Plan to show where the design guidelines apply. However, from the map it is still hard to determine exactly which design guideline apply and where. • ***Area within which guidelines for major residential development and proposals for development outside the built up area apply-*** does this refer to all the guidelines in part c or just sections 5, 6 and 8? It needs to be clear. Also, it is not clear why the yellow hatched area has been selected? Given the scale of the map, it is going to be difficult to determine whether a site falls within or outside this boundary. There is also the possibility that development may occur outside the hatched area. It is suggested that part C (sections 5, 6 and 8) should apply across the whole neighbourhood area and that the map should be amended accordingly. • ***Area within which guidelines for small residential development sites apply-*** presumably this relates to section 7 but this is not clear. It is not clear why this guideline is confined to the draft development boundary as shown in our own Regulation 18 Local Plan consultation, as there is the possibility that residential development may come forward outside of the development boundary. There are also issues with showing a development boundary which is still only in draft form and is subject to change through the Local Plan process. It is suggested that part 7 should apply to the whole neighbourhood area. • ***Area within which guidelines for proposals in the town centre apply-*** This is based on our Town Centre	The Town Council is broadly happy to amend the figure in line with the suggestions made, other than in respect of the Town Centre boundary, which needs defining.

Boundary in the emerging Local Plan which is still subject to change. • ***Designated employment areas where existing design guidance applies-*** existing design guides will apply across the whole of the neighbourhood area, so it is not considered necessary to single out employment areas. It is recommended that this category is removed from the map. It states at the bottom of the key that 'outside of the areas indicated existing design guidelines apply e.g. the Wealden Design Guide'. In fact, the Wealden Design Guide will apply across the whole district, including the neighbourhood area. It is suggested this sentence is removed.	
Figure 3 As with the Neighbourhood Plan, it is recommended that on any mapping which contains the draft housing allocations and employment sites within the emerging Local Plan, that these should be removed as these are still subject to change within the 'Focused' Wealden Local Plan (Regulation 18) previously published for consultation and the Proposed Submission Wealden Local Plan (Regulation 19) that will be published later in the calendar year. It is recommended that the draft housing allocations and employment sites are removed from the map and these are subject to revision.	It is important to include a plan shown allocations are areas of growth to set the context for the guidelines. They are important for purposes of context, to help explain the pressure on land and wider growth spirations established in the emerging Local Plan, and thus why design guidance is required. This can be updated to show the Reg 19 sites or the plan replaced with an extract of the policies map in the emerging Local Plan.
Conformity with the Council's Statutory Development Plan In line with comments on the Neighbourhood Plan, there are significant references to the emerging Wealden Local Plan as opposed to the adopted statutory development plan that the	It is entirely normal for Neighbourhood Plans and supporting material to be prepared ahead of adoption of a new Local Plan. This is particularly important in Wealden where the Core Strategy

Neighbourhood Plan will be assessed against at the examination stage. Therefore, there are concerns with prematurity and timing of the Neighbourhood Plan. Examples of this appear in paragraphs 2, 3 and 4 on page 5 that will need to be reviewed to remain current. Indeed, these paragraphs are a moment in time and will become out of date quickly. For example, the figures used in paragraph 3 on page 5 relate to the 'Focused' Wealden Local Plan (Regulation 18) consultation, which is still subject to change prior to the Regulation 19 consultation and during the examination.	contains a very limited set of policies and where saved development management policies date back to 1998. The references in the text can be updated to the current Reg 19 version of the Local Plan. References to this are helpful for context and explain why the Design guidelines are needed and the broad direction and focus of the Guidelines. It can be noted that the position is subject to change, but the Town Council does not agree that references should be removed. Indeed, simply reference back to the adopted development plan will date the guidelines and potentially limit its effectiveness.
Design Review On page 5, penultimate paragraph, it states that a 'Design Review should take place for all major applications and also on smaller sites in sensitive or important locations'. As stated in our comments on the Neighbourhood Plan, WDC does not use a Design Review Panel and have no plans to use one in the immediate future. We previously suggested that this paragraph is removed from the HDG at the Regulation 14 stage of the Wealden Local Plan.	Design Review is identified as a tool in the NPPF that LPAs should make use of. Wider design review services that operate outside of the LPA can be utilised. The aspiration for Design Review is established in the made Neighbourhood Plan and is carried forward. It is not necessary for this to be removed.
New Local Plan On page 9 the HDG, it refers to draft policies in the emerging Local Plan. The quotations used are from the draft Wealden Local Plan (Regulation 18) consultation undertaken in March 2024 and the design policies will be altered for Proposed Submission Wealden Local Plan (Regulation 19) that will be published later in the calendar year. It is recommended that these quotations are removed as they will very soon be out of date.	The Town Council is happy to update this section to refer to the most recent version of the Local Plan, and to note that this is subject to change. However, as above, this is important to retain as it sets the context for the guidelines.

Figures 11, 19, 20 and 25 It is recommended that on any mapping which contains the draft housing allocations and employment sites, that these should be removed as these are still subject to change as part of the Proposed Submission Wealden Local Plan (Regulation 19) later in the calendar year.	The Town Council is happy to remove the allocations from these Figures – on the basis that Figure 3 is retained (or replaced with an extract of the policies map from the Local plan), as these are important for context.
Materials WDC are concerned that this section on page 15 is not in line with the text in the draft Conservation Area Character Appraisal document. Weatherboarding is not prevalent and neither is tile hanging. In addition, exposed timber frames are not common, and neither is thatch. We previously commented that this section should be amended to avoid conflict with the draft Conservation Area Character Appraisal document. Page 67 of draft Conservation Area Character Appraisal states that: 'Most of the older buildings in the area are constructed of materials from local sources. The predominant wall construction material is brick. Many of the buildings are also stuccoed (rendered). There has been little use of local flint on buildings, mainly limited to the church tower and some boundary walls. There is some use of tile-hanging, but it is mainly limited to architectural detailing. Weatherboarding is not a common historic material in the town. Older timber framed buildings have mainly been refaced in brick, with little exposed timber framing. Roofs are mainly gabled, with some hipped, and clay tiles are the main roofing material. Slate is also found on some of the 19th century buildings'.	This comment appears to conflate the Conservation Area with the town as a whole. This section of the Design Guidelines is not just limited to the Conservation Area and includes cross reference to the town-wide Character Assessment previously prepared as part of the made Neighbourhood Plan (and which comprised a supporting document to that and which is cross referenced in policies in that). It is important to note that all sections in Chapter 3 of the Design Guidelines are a summary of key points. The focus of the Guidelines is presented in Part B and Part C. The text in Chapter 3 is proportionate to the document. It is expected that applicants would provide more detail through submission material.

The Consultation Statement accompanying the Hailsham Neighbourhood Plan explains that this section is not limited to the Conservation Area and refers instead to the whole town. In this case, we would recommend that this section is split between materials and details in the Conservation Area and those used in the rest of the town. On page 21, WDC is concerned that this page mixes the high street character and vernacular, with the surrounding residential character areas. In our view, the two are really quite distinct. Also, there is no mention of inappropriate materials such as weatherboarding. Again, we would suggest that in this section, materials are clearly differentiated between those used in the Conservation Area and those used elsewhere in the town. On page 27, WDC confirms that concrete tiles are not local to Hailsham. On page 61, weatherboarding is not local to Hailsham, and neither is concrete tiles. Hailsham was a clay brickmaking area, so clay tiles are the local material.	
Part Pedestrianisation of High Street Page 40-41- Having a section here on part pedestrianisation of the High Street will be confusing for users as it is an aspiration. It is recommended that the section on the pedestrianisation of the High Street is removed as it does not clearly relate to the remaining elements of the Design Guide. It is already a project within the Neighbourhood Plan, and it is not necessary to repeat here.	This section is to be retained as an important aspiration for the Town Centre and inclusion of which allows for principles to be established which could form the basis of any more detailed scheme to be taken forward, including whether any development projects and opportunities that come forward in the town centre might help contribute towards the aspiration. Removal of this would weaken the aspirations for change as clearly expressed through the consultation process.

HTC-04: A pedestrian friendly, walkable environment Part 7- Balconies, Loggias and roof terraces are not characteristic of the town centre. We therefore suggest part 7 is amended to reflect this.	The text says these should be provided where appropriate and does not dictate that they will be necessary in all instances. The lack of balconies or similar in the town centre at the moment does not mean that they should not be provided in future. Indeed, there is a lack of residential development in the town centre, which perhaps explains the lack of this design feature. However, the provision of outdoor amenity space is important, particularly should opportunities for intensification come forward on previously developed land in the town centre. The Town Council does not consider it necessary to amend this section.
HTC-08: Change and development in the Conservation Area In WDCs view, this reads more as policy than design guidance. It also conflicts with some of the preceding guidance. It is recommended that this is amended to just relate to design guidance. This could be incorporated in the NP as supporting text and this could consider guidance for specific details (e.g. ensuring windows are of appropriate materials, divisions, opening and form etc, resisting painting of traditional materials (i.e. brickwork and tile hanging), resisting inappropriate modern materials such as concrete tiles and liquid membrane on flat roofs etc, removing bollards, consideration of hard surfacing and street furniture.	This section was specifically inserted in response to comments on the earlier draft provided by WDC, and based on review of examples supplied from elsewhere, and where the 'codes' in those documents are similar in length and content. The NDP does include reference to heritage assets in policy, but does not seek to duplicate national policy on this, and neither the NDP nor Design Guidelines seek to repeat the information in the Conservation Area Appraisal. Rather, this is cross-referenced (as per Part 3 of Code HTC08 and the separate signposting section in the green shaded box), requiring applicants and decision-makers to consider this alongside the NDP and Guidelines. The text of the Guideline is not considered to be in conflict with the Conservation Area. The position in the NDP and Guidelines is that change and development can take place, but these should respond positively to the Conservation Area. This is clearly set out in the Guidelines. The Town Council does not consider it necessary to amend this section.

WEL-02: Amenity Green Space. In WDCs view, this also reads more as policy than design guidance. It is suggested that this is amended to just relate to design guidance.	All aspects of this section are considered to be important design matters. The Town Council does not consider it necessary to amend this section.
RET-01: Sustainable drainage systems. The guideline RET-01 seems to read more like planning policy, which is being prepared within the emerging Wealden Local Plan, than design guidance. Also, there are specific considerations for the Cuckmere and Pevensey Levels hydrological catchment area which have not been included.	All aspects of this section are considered to be important design matters, all of which are focussed on SuDS. Issues in respect of the Cuckmere and Pevensey Levels are addressed in wider policy and not repeated in the Design Guidelines. The Town Council does not consider it necessary to amend this section.