Wealden Consultation Statement

Representation Summaries:

Local Plan Sections and Policies

Vision and Objectives

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 221	**Support:** 82	**Neutral:** 43	**Object:** 96

Vision and Objectives		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy/Wording**
Historic England Requested a clearer description of Wealden's heritage characteristics within the attractive and locally distinctive places vision.	Comment noted. The vision and objectives have been reviewed to ensure the historic environment and the District's distinctive heritage characteristics are expressed clearly.	Review and strengthen heritage wording within the vision, mini-visions and objectives.
Natural England Broadly supported the vision but requested stronger wording on conserving, restoring and enhancing nature, climate adaptation, nature-based solutions, protected landscapes, green and blue infrastructure, access to nature and active travel.	Support welcomed. The suggested terminology and stronger references to nature recovery, protected landscapes, climate resilience, green infrastructure and access to nature will be considered.	Review and strengthen relevant vision and objective wording for the natural environment, streamlining the objectives, but giving them more focus. .
National Highways Supported a vision-led approach and welcomed objectives on sustainable transport, walking, cycling, connectivity and access to town and local centres.	Support noted. The transport objectives are consistent with a vision-led approach and will continue to inform the spatial strategy and policy framework.	No substantive change required. General review and streamlining achieved of the visions and objectives.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**

Kent County Council Welcomed recognition of the contribution that public rights of way in East Sussex and Kent could make to Wealden's future.	Support noted. Cross-boundary rights-of-way connectivity will continue to be considered through infrastructure planning.	No substantive change required. General review and streamlining achieved of the visions and objectives.
East Sussex County Council Requested stronger references to inclusive and active travel, public transport, sustainable infrastructure and accessibility to employment and centres. Public health comments sought broader healthy-place objectives and explicit consideration of climate impacts on health.	Comments noted. The vision and objectives will be reviewed to strengthen inclusive travel, accessibility, active travel, sustainable infrastructure and healthy-place outcomes.	General review of transport infrastructure and health wording within the objectives has been undertaken.
Tunbridge Wells Borough Council Objected because delivery depended on cross-boundary infrastructure and services, requiring further duty-to-cooperate work with relevant authorities and providers.	Objection noted. Cross-boundary infrastructure requirements and delivery arrangements will continue to be addressed through duty-to-cooperate engagement and the Infrastructure Delivery Plan (IDP).	Update evidence and delivery arrangements to support the Local Plan. IDP will be published to support growth identified in the Local Plan.
Town/Parish Councils	**WDC Response**	**Proposed Changes to Policy**
Rotherfield Parish Council and Chalvington with Ripe Parish Council Supported the overall vision, mini visions and objectives.	Support noted.	No change required.
Mayfield and Five Ashes Parish Council Requested quantified targets, monitoring indicators and clearer identification of delivery partnerships.	Comments noted. Monitoring indicators, measurable outcomes and partnership arrangements will be reviewed through the monitoring and delivery framework.	Review monitoring framework and delivery partnerships.
Heathfield and Waldron Parish Council	Support noted. The role of sustainable transport, digital connectivity and nature	No substantive change required.

Supported the vision and objectives, emphasising nature recovery, rail travel, home working and preparation for changing local business patterns.	recovery will be considered throughout the Plan.	
Laughton Parish Council Considered the vision too broad and unclear, sought clarity on delivery, stronger community-building objectives and support for co-housing, self-build and smaller builders.	Comments noted. The clarity and delivery focus of the vision and housing objectives will be reviewed, including support for diverse housing delivery.	Housing delivery objectives have been revised and streamlined as part of the general review of this section of the Local Plan.
Uckfield Town Council Questioned deliverability of infrastructure and health objectives; requested stronger public transport, active travel, local economy, digital connectivity, local design and community objectives.	Comments noted. Relevant objectives will be reviewed for clarity, deliverability and stronger links to public transport, active travel, local services, design and digital infrastructure.	General review and refinement of the relevant objectives.
Arlington Parish Council Supported the vision but requested more genuinely affordable smaller homes and measures to reduce through traffic in Arlington and Upper Dicker.	Support and concerns noted. Housing mix, affordability, road safety and traffic management will be considered through relevant policies and partnership working.	No specific vision change required; supporting policies will be reviewed.
Polegate Town Council Considered the vibrant-centres vision inconsistent with proposed allocations and raised road and infrastructure constraints affecting employment growth.	Comments noted. The relationship between the vision, allocations and infrastructure requirements will be reviewed through the site assessment and infrastructure planning process.	Site allocations will be reviewed for consistency and infrastructure evidence will be developed and published to support the Local Plan.
Frant Parish Council Broadly supported the vision and requested Chapters 2 and 3 to follow the same thematic order.	Support noted. Document structure will be reviewed for consistency.	No changes required.

Pevensey Parish Council Supported the vision but requested a specific climate objective on maintaining coastal defences and protecting homes, businesses and infrastructure from tidal flooding.	Support and request noted. Coastal flood risk and defence requirements will be considered through the climate, flood-risk and infrastructure policies.	General review coastal defence wording within vision and objectives. Consideration has been made to a Coastal Change Management Area which is presented through a supporting Background Paper.
Site Promoters	**WDC Response**	**Proposed Changes to Policy**
Richborough Supported the broad vision but sought explicit commitment to meeting housing needs in full, addressing past under-delivery and maintaining a sufficient deliverable housing supply.	Comments noted. The housing requirement, delivery record and deliverable supply will be reviewed through the spatial strategy and housing evidence.	No changes required.
Julian Black, on behalf of Hop Farm Real Estate Limited Objected to the capacity-based housing approach and sought full provision for housing needs, previous shortfalls and additional suitable land in the Low Weald.	Comments noted. Housing need, environmental constraints and the suitability and deliverability of potential allocations will be considered through the spatial strategy.	No changes required.
Grassroots Planning, on behalf of South West Strategic Developments Supported the main vision but requested stronger emphasis on affordability and objectively assessed housing needs, recognition of locations that can be made accessible, and a revised housing mini-vision title.	Comments noted. Housing affordability, need, accessibility and the wording of the housing vision will be reviewed.	General review of the overall vision and housing mini-vision wording. Affordability is highlighted in Objective b of the 'delivering homes for all' mini vision.
Elms and Willis Limited	Support noted.	No change required.

Supported the overall vision, mini visions and objectives.		
DHA Planning Limited, on behalf of Tarn (Mornings Mill) Limited Supported the eight mini visions but sought confirmation that housing and economic needs would be met in full and requested amended wording on high-quality, well-designed and energy-efficient homes.	Comments noted. The housing requirement and wording of the housing objectives will be reviewed against national policy and the evidence base.	General review of housing vision and objective wording, as well as design and climate change emphasis.
DHA Planning, on behalf of Bellway Strategic Supported the eight mini visions but sought confirmation that housing and economic needs would be met in full and requested amended wording on high-quality, well-designed and energy-efficient homes.	Comments noted. The housing requirement and wording of the housing objectives will be reviewed against national policy and the evidence base.	General review of housing vision and objective wording, as well as design and climate change emphasis.
DHA Planning, on behalf of Fernham Homes Limited Supported the eight mini visions but sought confirmation that housing and economic needs would be met in full and requested amended wording on high-quality, well-designed and energy-efficient homes.	Comments noted. The housing requirement and wording of the housing objectives will be reviewed against national policy and the evidence base.	General review of housing vision and objective wording, as well as design and climate change emphasis.
DHA Planning Limited, on behalf of Obsidian Strategic Asset Management Limited Supported the eight mini visions but sought confirmation that housing and economic needs would be met in full and requested amended wording on	Comments noted. The housing requirement and wording of the housing objectives will be reviewed against national policy and the evidence base.	General review of housing vision and objective wording, as well as design and climate change emphasis.

high-quality, well-designed and energy-efficient homes.		
DHA Planning, on behalf of Stonebond Properties (Sevenoaks) Limited and Akehurst Homes Limited Supported the eight mini visions but sought confirmation that housing and economic needs would be met in full and requested amended wording on high-quality, well-designed and energy-efficient homes.	Comments noted. The housing requirement and wording of the housing objectives will be reviewed against national policy and the evidence base.	General review of housing vision and objective wording, as well as design and climate change emphasis.
DHA Planning, on behalf of Hempstead Farm Limited Sought confirmation that meeting housing needs was mandatory and requested amended wording to deliver high-quality, well-designed and energy-efficient homes meeting local needs in full.	Comments noted. The housing requirement and objective wording will be reviewed against national policy and the evidence base.	General review of housing vision and objective wording, as well as design and climate change emphasis.
DHA Planning, on behalf of Naked Vine Limited Sought full delivery of housing and economic needs and stronger recognition of rural communities, including affordability, isolation, employment, services and facilities.	Comments noted. Housing need and the role and vitality of rural communities will be reviewed through the vision and supporting policies.	General review of housing vision and objective wording, as well as design and climate change emphasis.
DHA Planning, on behalf of James Fermor Sought full delivery of housing and economic needs and stronger recognition of rural communities, including affordability, isolation, employment, services and facilities.	Comments noted. Housing need and the role and vitality of rural communities will be reviewed through the vision and supporting policies.	General review of housing vision and objective wording, as well as design and climate change emphasis.

DHA Planning, on behalf of Earlswood Homes Holdings Limited Sought an explicit ambition to meet housing needs in full and amended wording on high-quality, well-designed and energy-efficient homes.	Comments noted. The housing requirement and objective wording have been reviewed against national policy and the evidence base.	General review of housing vision and objective wording, as well as design and climate change emphasis.
Tor and Co, on behalf of Hertfordshire Holdings Considered the vision generic and insufficiently linked to Wealden's specific opportunities, travel patterns and settlement roles, including the future of Hailsham.	Comments noted. The vision's local specificity, settlement roles and relationship to travel, infrastructure and corporate priorities have been reviewed.	Review locally specific vision and settlement objectives.
Rodway Planning Consultancy Limited, on behalf of A Cornwell Supported the overall vision, mini visions and objectives.	Support noted.	No change required.
Terra Strategic Supported the vision and mini visions but sought a plan period extending at least 15 years from adoption and greater emphasis on boosting housing supply.	Comments noted. The plan period and housing emphasis will be reviewed against national policy and the anticipated adoption timetable.	No change required. Vision extends to 2042.
Julian Black, on behalf of the Nevill Estate Company Objected to the housing mini vision, citing under-delivery and seeking additional deliverable housing supply and sustainable solutions for northern villages.	Comments noted. Housing need, supply, affordability and the distribution of growth will be reviewed through the spatial strategy.	No change required. Vision extends to 2042
Gladman Developments Limited	Comment noted. The plan period will be reviewed against national policy and the programme for adoption.	No change required. Vision extends to 2042.

Requested extension of the plan period to provide at least 15 years from anticipated adoption.		
Nexus Planning, on behalf of Signature Prime Property Supported the broad vision but sought greater emphasis on housing need, affordable and market housing, rural needs and a suitable mix of dwelling types.	Comments noted. Housing need, rural housing and the mix and tenure of homes will be reviewed through the housing strategy.	General review of housing vision and housing-mix in the objectives.
Nexus Planning, on behalf of Kitewood Estates Limited Supported the broad vision but sought greater emphasis on housing need, affordable and market housing, rural needs and a suitable mix of dwelling types.	Comments noted. Housing need, rural housing and the mix and tenure of homes will be reviewed through the housing strategy.	General review of housing vision and housing-mix in the objectives.
Dowsett Mayhew Planning Partnership, on behalf of the Estate of Jill Phillips Considered that the vision failed to commit to meeting identified housing need and sought explicit numerical provision, flexibility on location and stronger housing-supply objectives.	Comments noted. The housing requirement, spatial flexibility and wording of the housing vision and objectives will be reviewed.	General review of housing vision and housing-mix in the objectives.
Boakes Land Projects, on behalf of Mr Simon Boakes Supported the vision but requested clearer commitment to meeting housing need while prioritising sustainable locations.	Comment noted. The housing objective will be reviewed for clarity on need and sustainable distribution.	General review of housing vision wording and objectives.
Grosvenor Property UK Limited	Support and concerns noted. The housing target, spatial strategy and infrastructure	No change required.

Supported the vision and described a sustainable neighbourhood approach, but questioned whether the proposed housing target and spatial strategy could deliver the Plan's housing and infrastructure objectives.	delivery approach will be reviewed through the evidence base.	
Igloo Planning, on behalf of the Blackden Family Sought reference to a range of housing types and sizes, clearer ambition to meet local housing needs and an additional housing objective subject to suitable sites.	Comments noted. Housing type, size, need and the wording of the housing objectives will be reviewed.	General review of overall vision and housing objectives.
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Village Concerns Objected to the vision and objectives, citing disproportionate growth in East Hoathly, inadequate infrastructure, car dependency, environmental harm and insufficient explanation of the housing target.	Objection noted. Settlement capacity, infrastructure, transport, environmental effects and housing requirements will be reviewed through the spatial strategy and evidence base.	No change required.
Conservators of Ashdown Forest Requested established climate terminology, clearer wording on species decline and explanation of how biodiversity would be increased around Ashdown Forest.	Comments noted. Climate, nature recovery and biodiversity wording have been reviewed for clarity and accuracy.	General review of climate and biodiversity wording undertaken.
Uckfield Chamber of Commerce Supported the overall and mini visions.	Support noted.	No change required.
High Weald National Landscape	Support noted. The conservation and enhancement of the National Landscape will remain integral to the Plan.	No substantive change required.

Welcomed protection of the High Weald National Landscape within the attractive and locally distinctive places objectives.		
Pevensey and Cuckmere Water Level Management Board Supported the objective to protect and improve water environments.	Support noted.	No change required.
Transport Futures East Sussex Broadly supported the vision and objectives but sought objectives on reduced car ownership, appropriate densities, traffic and vehicle noise, and light pollution.	Support and suggestions noted. Sustainable transport, efficient land use and pollution objectives will be reviewed.	General review of transport, density and pollution wording in relation to all objectives.
English Regional Transport Association Supported stronger climate and transport action, including rail reinstatement and capacity improvements, continuing infrastructure-provider engagement and improved walking and cycling conditions.	Comments noted. Strategic rail proposals, sustainable transport and infrastructure coordination will continue to be considered with relevant partners.	No change required.
Sussex Wildlife Trust Supported the overall vision, mini visions and objectives, including restoration of the natural environment and recognition of green and blue infrastructure.	Support noted.	No substantive change required.
Crowborough and District Chamber of Commerce Supported the vision and objectives but sought stronger economic wording and an objective to	Support and suggestions noted. Economic vision and employment-land objectives will be reviewed against the economic evidence.	General review of economic and employment-site wording within vision and objectives

provide new high-quality employment sites meeting business needs.		
Willingdon Residents' Association Objected to merged development boundaries and sought retention of distinct settlement identities.	Concern noted. Settlement identity, coalescence and development boundaries will be considered through the spatial strategy and relevant policies.	No change required.
CIHT Supported the vision and objectives but sought stronger green-space access, clearer housing affordability terminology, better balance between homes and employment, and consideration of public transport integration and taxi provision.	Support and suggestions noted. Accessibility, affordability, employment balance and sustainable transport wording have been reviewed.	General review of housing, green-space and transport objectives.
Clarity Ecoworks Sought carefully located one- and two-bedroom homes near the High Weald rail network to support younger local people, rural communities and lower-carbon living.	Comments noted. Housing mix, rural housing need, landscape constraints and accessibility will be considered through the spatial strategy and housing policies.	General review of housing mix and rural accessibility wording.
Green Transition Crowborough Supported the overall objectives but sought stronger interaction between policy themes and recognition of likely economic and social change to 2040.	Support and comments noted. Links between objectives and future economic and social trends will be reviewed.	General review of vision and objectives has been undertaken.
SE Marts Ltd Sought recognition of Hailsham Livestock Market's importance to the town and rural economy and allocation of a suitable alternative site.	Comment noted. The role and future accommodation of the livestock market will be considered through the economic strategy and site assessment process.	General review of rural-economy wording within the vision and objectives.
Eastbourne Eco Action Network CIC	Comments noted. Housing standards, spatial distribution, active travel and	No change required.

Sought higher-performing housing, better distribution of growth, delivery of active-travel and community infrastructure, and stronger commitments on transport, water, sewage and community cohesion.	infrastructure delivery will be reviewed through relevant policies and evidence.	
Cycle East Sussex Requested proper consideration and delivery of Local Cycling and Walking Infrastructure Plan routes, direct active-travel links and realistic evidence for modal shift.	Comments noted. Active-travel networks, route safeguarding and delivery evidence will be reviewed with the highway authority. This will be presented through the infrastructure evidence base in the IDP.	No change required.
Statkraft UK Ltd Supported the priority given to the climate crisis and the objectives for renewable and low-carbon energy.	Support noted. The positive framework for climate and renewable-energy policies will be retained and refined as necessary.	No substantive change required.
ARBB Services Sought reduced development within seven kilometres of Ashdown Forest, removal of Whitehouse Farm UCK11, protection of the Lake Wood to Buxted corridor and recognition of the wider High Weald character area.	Comments noted. Habitat, landscape, nature-recovery and site-specific constraints will be considered through the spatial strategy and site assessments.	No change required.
Local Residents	**WDC Response**	**Proposed Changes to Policy/Wording**
• Responses showed mixed support for the overall vision, local “mini-visions” and objectives, although many supported their broad principles while seeking stronger delivery mechanisms. • The vision should give greater priority to climate resilience, biodiversity, landscape protection and nature recovery, including flood risk, water	Comments noted. The broad support for the vision and objectives was welcomed. The Council will review the vision and objectives to improve clarity, local distinctiveness and measurable delivery, and to strengthen appropriate references to climate resilience, nature recovery, landscape protection, housing needs, sustainable transport, infrastructure, the rural economy	A general review has been undertaken to refine the vision, objectives and supporting delivery framework to strengthen local specificity, measurable outcomes and appropriate references to climate resilience, nature recovery, housing needs, sustainable transport, infrastructure, the rural economy and community involvement.

quality, ancient woodland, hedgerows, wildlife corridors and dark skies. • Housing growth should be proportionate to local need, with greater emphasis on affordable, social, smaller and specialist homes, brownfield land, existing buildings and the needs of younger and older residents. • Development should be supported by timely infrastructure, particularly healthcare, education, water, wastewater, highways, public transport, broadband and community facilities, preferably before occupation. • Objectives should reduce car dependency by improving public transport, walking and cycling, while recognising the district's rural geography and existing transport limitations. • The vision should better reflect Wealden's rural economy, agriculture, food security, tourism and local employment, including home-working and support for small businesses. • Respondents sought clearer, measurable and locally specific objectives, stronger community involvement, and greater transparency about how proposed sites and development levels had been assessed against the vision.	and community involvement. Infrastructure requirements and delivery will continue to be addressed through relevant policies, the Infrastructure Delivery Plan and partnership working. Sites have been assessed through the Council's site selection methodology, including consideration of site-specific constraints, deliverability and consistency with the spatial vision.	

Spatial Strategy

Policy SS1: Spatial Strategy for Wealden

Regulation 18 Draft Local Plan Consultation

Total: 614	**Support:** 82	**Neutral:** 59	**Object:** 473

Policy SS1 – Spatial Strategy for Wealden		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Supportive of draft Policy SS1 Spatial Vision for Wealden • The inclusion of the Willingdon Chord should be removed as there is no plan to reinstate it • Para 4.16. add reference to transport • Para 4.17 add reference to the draft East Sussex Local Transport Plan in the penultimate sentence. Replace the last part of the last sentence with '*and minimise car reliance for shorter journey*' to acknowledge that not everyone is able to walk/cycle/wheel if disabled. • Policy SS1, 1.a) add accessible after sustainable, 1.b) add transport before infrastructure	• Support welcome • Updated position: Subsequent discussion between WDC and ESCC have confirmed the position in Willingdon Chord has changed. The route should now be safeguarded and added to the Policies Map. • Both suggested additions for references in para 4.16 and to the East Sussex Local Transport Plan are noted. The plan is read as a whole and additional references are not required. • The suggestion of additional wording in SS1 is noted. The policy wording has been revised to strengthen accessibility. • Para 4.31 will be reviewed and corrected.	Amended supporting text and policy wording as outlined. Proposed changes to the Policy map.

• In Figure 6, the railway line south of Uckfield and the Willingdon Chord should not be shown on the map as actual railway links • Para 4.31 and is repeated on the 8th line		
High Weald National Landscape • Object to proposed development boundary extensions at Cross in Hand, Groombridge, Hartfield and Heathfield.	• Objections noted. • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	No change required.
National Highways • Object that Policy SS1 does not fully incorporate sustainable locations, proximity to communities and public transport, or the 20-minute neighbourhood concept.	• Objection noted. • The Council has carried out detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	No change required.

Natural England • Supportive of the policy and limiting growth within or near the High Weald National Landscape. • Request reference to the duty to conserve and enhance the natural beauty of the High Weald National Landscape in para 4.12. • Request consideration of major development, Green Infrastructure Standards and glossary definition of development boundaries. • Suggested revised wording for criterion 1a. • Support 1.c) and the delivery of green infrastructure as part of the environmental benefits	• Support welcomed • Para 3.11 (previously 4.12) has been updated in light of wording suggestions. • Plan revisions made to update wording around GI and in Policy SS10 Green Infrastructure.	Amended supporting text and policy wording as outlined.
Southern Water • Supportive of draft Policy SS1.	• Support noted.	No action required.
Sport England • Supportive of draft Policy SS1.	• Support noted.	No action required.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Eastbourne Borough Council • Accept the sustainability credentials of focusing development on the edge of conurbations such as Eastbourne. • Raised concerns about infrastructure mitigation.	• Support noted. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan.	No change required
South Downs National Park Authority • Supportive of draft Policy SS1.	• Support welcome. • Textual updates made to address issue of furthering the purposes of the NP.	Textual updates made to address issue of furthering the purposes of the NP.

• Requested specific reference to the duty to seek to further the purposes of the National Park.		
Tunbridge Wells Borough Council • Object to growth directed near the borough boundary and raise concerns about pressure on services, facilities and infrastructure. • Consider that allocations near the boundary should contribute toward Tunbridge Wells housing land supply and unmet need.	• Comments noted. • The Council acknowledges these concerns. However, the spatial strategy and site allocations have been developed to meet Wealden's identified development needs, taking account of the settlement hierarchy, sustainability considerations, environmental constraints, infrastructure capacity, and the availability and suitability of land for development. The proximity of some allocations to the borough boundary does not in itself make them inappropriate where they are considered sustainable and capable of being supported by the necessary infrastructure • The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. The Local Plan has been prepared to firstly seek to first meet Wealden's own objectively assessed needs and development requirements. The plan does meet or exceed its own standard method figure and therefore, there is not able to contribute towards any need in Tunbridge Wells. • Infrastructure required to meet growth is set out in policy wording within the Local Plan and supporting Infrastructure Delivery Plan.	No change required.

Parish/Town Councils	WDC Response	Changes made to policy/chapter
Arlington Parish Council • Supportive of draft Policy SS1.	• Support noted.	No action required.
Heathfield and Waldron Parish Council • Supportive of draft Policy SS1.	• Support noted.	No action required.
Buxted Parish Council • Objected because of historic landscape impacts, landscape transition issues and concerns over coalescence. • Considered development should be directed to areas with existing infrastructure.	• The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The plan should be read as a whole. Any development must also comply with other policies in the plan, such as HE1; HE2;HE3 and HE5; NE6; NE7 and NE8.	
Chalvington with Ripe Parish Council • Supportive of Policy SS1 and the introduction of development boundaries.	• Support noted.	No action required.
Chiddingly Parish Council	• Support noted.	No action required.

• Supportive of Policy SS1 and proposed development boundaries.		
East Hoathly with Halland Parish Council • Considered the settlement hierarchy to be a tick-box exercise with insufficient regard to capacity or improvement potential.	• Comments noted • The methodology provides a consistent and transparent framework for assessing the relative role and function of settlements across the district, based on the availability of services, facilities and accessibility. The SSS's purpose is not a detailed evaluation of development capacity or the potential for future infrastructure improvements • Matters relating to development opportunities, constraints and growth potential are considered through other elements of the plan-making process, alongside evidence on housing, employment, transport and infrastructure provision • WDC considers the settlement hierarchy methodology to be proportionate and appropriate for its intended purpose.	No change required.
Frant Parish Council • Raised concerns about regional context and argued rural and environmental designations should justify not meeting housing need.	• Comment noted • Environmental and rural designations are important considerations and have informed the spatial strategy and site selection process. However, the presence of such designations does not, in itself, justify a blanket approach to reducing housing provision. • The Council considers the approach set out in the Plan to be justified.	No change required
Hailsham Town Council	• Support noted	No change required

• Supportive of Policy SS1 but sought a more proactive approach to infrastructure and delivery. • Raised concerns about lack of place-specific detail and clarity over the 20-minute neighbourhood concept.	• Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan.	
Hellingly Parish Council • Raised concerns about disproportionate housing for a type 5 settlement and shared development boundary with other settlements.	• Comments noted. • The settlement hierarchy is only one factor that informs the spatial strategy and distribution of growth. Site allocations have also been considered against a wider range of planning considerations, including sustainability, deliverability, infrastructure capacity, environmental constraints and the overall housing requirement • The presence of a shared development boundary with neighbouring settlements does not, in itself, alter the settlement's position within the hierarchy	No change required.
Horam Parish Council • Objected and requested growth be directed to settlements with railway stations and frequent bus services. • Considered development boundaries should not extend beyond a 20-minute walk from village centres. • Requested amendments to the Horam boundary and protection of local gaps and sensitive areas.	• Objections noted. • The spatial strategy seeks to direct development to the most sustainable locations whilst balancing the need to meet housing requirements across the district. • Access to public transport, including railway stations and bus services, is an important consideration, but it is one of a range of factors that inform the distribution of growth and the identification of development boundaries • Development boundaries are not defined solely by walking distances from village centres. Their extent is informed by	No changes required

	settlement form, physical features, site-specific circumstances, and the planned role of settlements within the wider spatial strategy • The Council has considered matters relating to local gaps, landscape sensitivity and other environmental constraints through the plan-making process and supporting evidence base.	
Isfield Parish Council • Raised concerns about the rural nature of the district and opposed westward extension of Uckfield.	• Concerns noted • The spatial strategy seeks to balance the need to accommodate growth with the protection of the district's environmental and landscape qualities. Uckfield is identified as a sustainable location for development due to its role, function and range of services and facilities • The suitability of sites on the western edge of Uckfield has been assessed through the plan-making process, taking account of landscape, environmental, infrastructure and other planning considerations. • The Council considers that the proposed approach is supported by the evidence base,	No change required
Laughton Parish Council • Supportive of Policy SS1, especially the 20-minute neighbourhood concept and network of villages. • Requested more detail on the network of villages.	• Support welcomed.	No change required
Mayfield and Five Ashes Parish Council	• Support welcomed • The spatial strategy has been informed by evidence on housing need, demographic	No change required

• Supportive of Policy SS1 but considered the strategy would not deliver local need.	trends, infrastructure capacity and settlement sustainability. The distribution of growth seeks to balance the provision of homes, employment and supporting infrastructure across the district	
Ninfield Parish Council • Objected that a one-size-fits-all strategy is unsuitable and Ninfield has been wrongly classified.	• Objection noted. • The Spatial Strategy provides a district-wide framework that is informed by the differing roles, functions and characteristics of individual settlements. The settlement hierarchy has been developed using a consistent methodology to ensure a transparent and equitable assessment across the district. • The Council has reviewed the settlement hierarchy as part of the preparation of the Regulation 19 Local Plan.	Settlement hierarchy reviewed but no change in settlement type.
Pevensey Parish Council • Objected and requested boundary changes at Pevensey, including reference to the conservation line and churches. • Requested clarification on flooding, cross-referencing and how the 20-minute village approach applies.	• Objection noted. • Development boundaries have been reviewed as part of the preparation of the Regulation 19 Local Plan. • The 20-minute village concept is one consideration in assessing accessibility and sustainability but is not the sole determinant of development boundaries	Settlement boundaries have been reviewed as part of the development of the Local Plan. The development boundary has been retained at Pevensey.
Polegate Parish Council • Objected due to infrastructure delays, business growth challenges, capacity concerns and inconsistent treatment of Polegate and Willingdon. • Requested stronger wording on boundaries and countryside protection.	• Objections noted. • These matters have been considered through the preparation of the Plan and are informed by the wider evidence base, including infrastructure, settlement and site assessment work.	The policy has been reviewed and restructured. The Council consider the wording on development boundaries and the protection of land outside them is strong enough.

	• The Council considers that the Plan provides an appropriate framework for managing development and protecting the countryside through its spatial strategy and development management policies.	
Rotherfield Parish Council • Supportive of Policy SS1 but queried how windfall units would come forward within tightly drawn boundaries.	• Support welcomed	No change required
Uckfield Town Council • Objected and requested employment provision in large developments, protection of high street uses and consideration beyond 2040. • Raised concerns about High Weald mapping, affordability, compact town principles, brownfield delivery and conservation area review.	• Objection noted. • Employment provision will be focused on the strategic employment sites listed in Policy SS6. • Protection of high streets is addressed through policies TC1, TC2 and TC3. • Brownfield delivery is addressed in Policy HO3. • Conservation Areas are covered by policy HE3.	No change required.
Westham Parish Council • Objected because of strain on communities and concern about breaching the A27 trunk road boundary.	• Objection noted. • These matters have been considered through the preparation of the Plan, including the assessment of development impacts and the spatial strategy.	No change required.
Willingdon and Jevington Parish Council • Objected to development boundaries, stating towns and villages should retain distinct boundaries.	• Objection noted. • Development boundaries have been reviewed through the plan-making process, taking account of settlement characteristics, development needs, environmental constraints and the overall spatial strategy.	No change required.

Withyham Parish Council • Supportive of Policy SS1 but did not support WIT1 in the development boundary. • Suggested possible areas for development at Balls Green, Royal Mires, Lye Green and brownfield sites in Blackham.	• Support welcomed. • Review of settlement hierarchy and SHELAA sites have been undertaken.	No change required.
Other Consultee Bodies and Site Promoters	**WDC Response**	**Changes made to policy/chapter**
ASP • Object because development boundaries may restrict future growth and the 20-minute neighbourhood concept is unclear in rural and urban contexts.	• Objection and comments noted. • 20-min neighbourhood concept and rural areas is covered in paras 3.22 – 3.25 of the supporting text of the 2026 Plan. This was also in the 2024 Plan.	No change required.
B Yond Homes Limited • Object that the policy is overly restrictive and focuses growth on the south outside the AONB, failing to provide homes for all areas.	• Objection and comments noted • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	No change required.
Bellway Strategic; Earlswood Homes Holdings Limited; Fernham Homes (Sussex) Limited; Fernham Homes Limited; Hempstead Farm Limited; James Fermor; Obsidian Strategic Asset Management Limited; Robert	• Support noted.	No change required

Vine; Stonebond Properties (Sevenoaks) Limited and Akehurst Homes Limited; Tarn (Mornings Mill) Limited; • Support growth in line with settlement sustainability and recognition that settlements may move up the hierarchy through sustainable growth.		
Boakes Land Projects • Supports the strategy but says boundaries are too restrictive.	• Support noted.	No change required
Castlefort Homes, Firle Estate, Trafalgar Group, Rookwood Trinity • Support the policy	• Support noted.	No change required
Esquire Developments • Supports concentrating growth around the district's most sustainable settlements	• Support noted.	No change required
Transport Futures East Sussex • Supports the 20-minute neighbourhood concept and advocates higher densities and stronger sustainable transport measures	• Support noted.	No change required

Frontiers Estates • Supports the hierarchy and proposed boundaries	• Support noted.	No change required
ASP, B Yond Homes, Catesby Strategic Land, Croudace Homes, Deanland Wood Park, Formula Land, Harvey & Sons, Hop Farn, KLW/Nevill Estate, MJD Designer Homes, Ninfield Development Ltd, Persimmon Homes, Richborough, Signa Strategic Land, South West Strategic Developments, Real Select Ltd, Taylor Wimpey, Terra Strategic, Pickering Family Group SIPP and others • Raise concerns around the following themes: o Housing numbers are too low and the strategy will not meet housing need. o Development boundaries are too restrictive. o More growth should be directed to villages and settlement edges. o The plan period should be extended. o Further spatial options should be explored including dispersed growth or new settlements.	• Comments noted • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints. • The Plan will cover a 16-year plan period between 2026 and 2042.	No change required.
Other named consultees and promoters • **Responses from Boakes Land Projects, Castlefort Homes, Catesby Strategic Land, Conservators of**	• Comments noted • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic	No change required

Ashdown Forest, CPRE Sussex, Croudace Homes, Crowborough and District Chamber of Commerce, Deanland Wood Park, Dicker Residents Association, Eastbourne Eco Action Network, Elms and Willis, Esquire Developments and TWRFC, Firle Estate, Folkington Estate, Formula Land, Friends of the South Downs, Frontiers Estates, Gladman, Greymoor Homes, Grosvenor Property, Green Transition Crowborough, Harvey & Sons, Hertfordshire Holdings, Hop Farm Real Estate, KLW, Nevill Estate Company, Martin Grant Homes, MJD Designer Homes, Ninfield Development, Persimmon Homes, Richborough, Signature Prime Property, Kitewood Estates, Shepherd Neame, Signa Strategic Land, South West Strategic Developments, Real Estate Land Limited, AM Work Space Limited, Westcott Leach Limited, Real Select Limited, Rookwood Trinity, Rotherfield Protection Group, Sedas Strategic Land, SE Marts, Sifelle, Taylor Wimpey, Terra Strategic, The Pickering Family Group Sipp, Trafalgar Group, Transport Futures East Sussex, Village Concerns, Vistry Group, Reiner Properties, Wates Development, Wealden Food Partnership and Willingdon Residents Association • Included a mix of support, objections and site-specific requests. • Main issues included housing need and delivery, plan period, development boundary flexibility, settlement hierarchy, infrastructure, transport accessibility, 20-minute neighbourhoods, landscape and biodiversity	Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan. • The Plan will cover a 16-year plan period between 2026 and 2042.	

constraints, AONB/National Landscape impacts, brownfield priority, employment distribution, strategic growth options and site-specific omissions.		
Local Residents	**WDC Response**	**Changes made to policy/chapter**
• Local residents raised both support and objections to Policy SS1. • Support included the use of development boundaries, brownfield priority, limited growth near the AONB, 20-minute neighbourhood principles, smaller developments, and directing growth to sustainable settlements. • Objections focused on the rural character of Wealden, landscape and biodiversity impacts, loss of greenfield land, pressure on infrastructure, road capacity, flooding, lack of services, impacts on the Ashdown Forest and Pevensey Levels, and coalescence between settlements. • Many residents considered growth should be directed to larger towns, rail-connected locations, the south of the district, or locations with stronger strategic road access. • Several residents raised concerns about Horam, East Hoathly, Uckfield, Maresfield, Buxted, Westham, Stone Cross, Pevensey, Rotherfield and development boundaries in or near the High Weald National Landscape. • Some residents argued that development boundaries are too restrictive, while others considered they are too wide or should protect green gaps and countryside.	• Concerns raised regarding the scale and distribution of growth, infrastructure capacity, environmental impacts, the protection of the countryside and settlement character, and the suitability of specific proposed allocations are noted. • The spatial strategy has been developed to balance the need to accommodate growth with the protection of the district's environmental, landscape and rural character. • It has been informed by a comprehensive evidence base, including assessments of settlement sustainability, infrastructure capacity, transport accessibility, environmental constraints, flood risk, biodiversity, and impacts on designated sites and landscapes. • Development boundaries have been identified through a consistent methodology and are intended to manage growth in a sustainable manner while protecting the wider countryside. • The 20-minute neighbourhood concept has informed the assessment of accessibility and sustainability but is not applied as a	No change required.

• Residents also queried whether the 20-minute neighbourhood concept is realistic in rural areas.	prescriptive requirement in defining the spatial strategy or development boundaries. • WDC considers that Policy SS1 provides an appropriate and balanced framework for the distribution of development across the district.	

Focused Local Plan Consultation

Total: 307	**Support:** 94	**Neutral:** 19	**Object:** 194

Policy SS1: Spatial Strategy for Wealden		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**

East Sussex County Council
 	
• Supportive of Policy SS1
• Make several requests for modifications
  ○ Strengthen the policy through explicit references to transport infrastructure such as the draft East Sussex Local Transport Plan and County Wide Transport Model
  ○ Include references to active travel and bus services
  ○ Ensure the policy recognises inclusive access and that not everyone can change travel mode - the concept of a
	• Support welcomed.
	• Comments noted.
	• WDC acknowledges the importance of transport infrastructure in supporting new development and agrees that clearer reference to transport infrastructure, including active travel and public transport services, could strengthen the policy
	• Whilst the concept of the 20-minute neighbourhood is intended to promote access to day-to-day services and facilities within local communities, it is recognised that travel choices will vary depending on individual circumstances, accessibility needs, and the availability of transport
		Policy wording amended to refer to active travel and public transport, vitality of towns and villages, complete and compact neighbourhoods and wider accessibility to day to day services.

"20-minute neighbourhood" aligns with some transport aspirations, however, not everyone can realistically switch transport modes. ○ recognise the role of settlements as service centres for wider rural areas where car travel may still be necessary.	options. The Plan is not intended to restrict travel choices but to encourage opportunities for sustainable movement where appropriate. • The Council further recognises that private vehicle use will continue to be necessary for some journeys, particularly where public transport provision is limited. This is reflected in the wider spatial strategy and settlement hierarchy. • Supporting text will be amended to accurately reflect the Council's use of the CWTM and other transport evidence in assessing growth options and infrastructure requirements.	
Southern Water • Broadly supportive of the policy but seeks amendments to strengthen the policy's approach to sustainable drainage systems (SuDS), climate change resilience, flood risk management and infrastructure provision, particularly in light of the proposed increase in housing growth. • A stronger policy commitment to SuDS across all development. • Better recognition of urban creep and flood risk impacts. • A more comprehensive Infrastructure Delivery Plan covering water and wastewater infrastructure.	• Support is welcomed. • The Council is satisfied that Policy SS1, when read alongside the wider policy framework and supporting evidence base, provides an appropriate and effective basis for securing sustainable development, supporting infrastructure delivery and promoting climate resilience across the district.	No change required

• Stronger links between sustainable development, climate resilience, infrastructure provision, and housing growth within Policy SS1.		
Network Rail • Broad support for draft Policy SS1. • Welcome the inclusion of text supporting the improvements required to local services, community facilities, and infrastructure. • strongly supports the reference in Policy SS1(4) to maximising development opportunities on land around rail stations. • Note that the policy is consistent with emerging Government policy and proposed changes to the National Planning Policy Framework (NPPF)	• Comments and broad support welcomed. • WDC consider that Policy SS1 provides an appropriate framework to support infrastructure-led growth and the effective use of land in accessible and sustainable locations	No change required
South East Water • Raise a potential concern regarding the deliverability of the scale of housing growth proposed under Policy SS1, as current water resource planning assumptions are based on substantially lower levels of development. • Seek closer alignment between housing growth forecasts and future water resource and infrastructure planning, together with ongoing engagement to ensure water supply can support the proposed growth strategy.	• The Council acknowledges that the housing requirement and supply identified in the Local Plan exceed the growth assumptions used in South East Water's WRMP24. • The Local Plan contains policies requiring the timely provision of infrastructure to support development, and the Council welcomes South East Water's commitment to update its forecasts through WRMP29 and to work collaboratively to ensure growth can be accommodated sustainably. • Continued engagement will be undertaken with South East Water to ensure water	No change required.

	supply and infrastructure requirements are understood and appropriately planned for.	
National Highways National Highways is broadly supportive of the direction of the policy but recommends amendments before adoption: o More explicitly prioritising development in sustainable locations. o Promoting active travel and public transport use. o Using the Government's Connectivity Tool to inform site selection. o Including a specific commitment to allocating development in sustainable locations	• Comments noted • The Council considers that Policy SS1 already promotes sustainable patterns of development through its focus on complete, compact and connected neighbourhoods and by supporting development in locations that can access services, facilities and employment opportunities.	No change required.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
South Downs National Park Authority • Supports the overall direction of Policy SS1. • Seeks amendments to ensure transport infrastructure is explicitly recognised. • Wants stronger references to active travel and bus services to support sustainable and accessible development. • Considers that transport choices should be inclusive and realistic, recognising the needs of rural communities and people who cannot easily switch travel modes.	• Comments and broad support welcomed. • WDC consider that Policy SS1 provides an appropriate framework to support infrastructure-led growth and the effective use of land in accessible and sustainable locations	See policy amendments above in line with ESCC comments.
Tunbridge Wells Borough Council • Strongly objects to the proposed spatial strategy, particularly the allocation of	• Comments and objections noted. • The proposed spatial strategy has been developed following consideration of housing needs, settlement hierarchy,	Further work has been undertaken to support and update the strategy and sites on the fringe. Including the approach to cross-boundary

approximately 657 dwellings adjacent to the Tunbridge Wells Borough boundary. • Consider that previous concerns, raised through both consultation responses and Duty to Cooperate discussions, have not resulted in meaningful changes to the strategy. • Insufficient information has been provided on how infrastructure needs and cross-boundary impacts arising from development near the borough boundary will be addressed. • The proposed allocation sites have a strong functional and spatial relationship with Tunbridge Wells and are likely to rely on services, facilities and infrastructure located within the borough • The full Infrastructure Delivery Plan (IDP) and updated Local Housing Needs Assessment (LHNA) were not available at the time of consultation.	sustainability objectives, environmental constraints and site assessment work undertaken across the district. • The location of development adjoining Tunbridge Wells reflects the relative sustainability of these settlements and their ability to access a range of services, facilities, employment opportunities and transport connections • The Council recognises the importance of assessing cross-boundary impacts and will continue to engage with Tunbridge Wells Borough Council through the Duty to Cooperate (and any future strategic engagement requirements) to ensure that potential impacts on infrastructure, services and communities are appropriately understood and addressed. • The Council notes the concerns regarding reliance on facilities within Tunbridge Wells. However, the sustainability appraisal and supporting evidence recognise the role of settlements within wider functional geographic areas and the benefits of locating development where there is good access to existing services and employment opportunities.	infrastructure. Policy SS1 updated as well as individual site policies.
Hastings Borough Council	• Comments noted.	No change required.

• Broadly positive and supportive of the Plan's strategic direction. • Comments are largely observational, with explicit support given to the town centre first approach and the proposed transport modelling work. • Note that growth is focused towards Eastbourne and Tunbridge Wells, with more limited functional links to Rother and Hastings.		
Mid Sussex District Council • Broad support for the overall direction of Policy SS1. • Concern that the strategy does not sufficiently address the identified housing shortfall. • Recommendation to maximise development opportunities, including reviewing constraints and site assessments. • Need for stronger emphasis on infrastructure delivery and transport capacity. • Continued cross-boundary collaboration should underpin implementation of the spatial strategy.	• Comments and broad support welcomed. • WDC consider that Policy SS1 provides an appropriate framework to support infrastructure-led growth and the effective use of land in accessible and sustainable locations. • WDC agrees on the importance of continued collaboration on strategic cross-boundary matters, including Ashdown Forest mitigation and infrastructure planning, and will continue to engage constructively with Mid Sussex District Council and other neighbouring authorities through the Duty to Cooperate and ongoing strategic planning discussions.	No change required.
Eastbourne Borough Council • EBC broadly supports the strategic direction of the spatial strategy • EBC acknowledges that growth adjacent to Eastbourne is a sustainable planning approach • Significant concerns are raised regarding the consideration of cross-boundary impacts and	• Comments and broad support welcomed. • WDC consider that Policy SS1 provides an appropriate framework to support infrastructure-led growth and the effective use of land in accessible and sustainable locations. • WDC agrees on the importance of continued collaboration on strategic cross-	No change required.

infrastructure Wastewater treatment capacity; GP and dental provision; Highway network capacity; School place provision; and green infrastructure and open space provision • Requests ongoing engagement and site-specific discussions regarding proposed development within Pevensey, Polegate, Westham, Willingdon and Jevington. • Seeks discussion regarding the cumulative impacts of the proposed scale of growth at Hailsham on services and infrastructure within Eastbourne Borough.	boundary matters, including infrastructure planning, and continues to engage constructively with EBC and other neighbouring authorities through the Duty to Cooperate and ongoing strategic planning discussions.	
Lewes District Council • LDC broadly supports the strategic direction of the spatial strategy • Raise concerns regarding transport impacts.	• Comments and broad support welcomed. • WDC consider that Policy SS1 provides an appropriate framework to support infrastructure-led growth and the effective use of land in accessible and sustainable locations. • WDC agrees on the importance of continued collaboration on strategic cross-boundary matters, including transport and infrastructure planning, and continues to engage constructively with LDC and other neighbouring authorities through the Duty to Cooperate and ongoing strategic planning discussions.	No change required.
Rother District Council • RDC broadly supports the strategic direction of the spatial strategy	• Comments and broad support welcomed. • WDC consider that Policy SS1 provides an appropriate framework to support infrastructure-led growth and the effective	No change required.

• Identify that the greatest potential cross-boundary effects on Rother are likely to arise from development in Ninfield and Wadhurst • Observes that the Plan proposes relatively modest levels of growth in areas close to the Rother boundary • Highlight the importance of considering cumulative transport impacts on the A259 and routes serving Bexhill and northern Rother. • RDC considers that collaborative working on transport evidence will assist both authorities in understanding cross-boundary infrastructure implications.	use of land in accessible and sustainable locations. • WDC agrees on the importance of continued collaboration on strategic cross-boundary matters, including transport and infrastructure planning, and continues to engage constructively with RDC and other neighbouring authorities through the Duty to Cooperate and ongoing strategic planning discussions.	
Pantiles and Park Ward Councillors, Tunbridge Wells Borough Council • Strongly object to SS1 • Proposed development is in effect an extension of Tunbridge Wells despite being within Wealden district. • New residents will be heavily reliant on Tunbridge Wells/Kent infrastructure and services. • Concern that there has been very limited cross-border engagement or discussion regarding how the infrastructure needed to support these homes will be funded • Argue that Wealden will benefit from the housing numbers and council tax revenues, while Tunbridge Wells residents will bear the impacts	• Objection and concerns noted. • WDC consider that Policy SS1 provides an appropriate framework to support infrastructure-led growth and the effective use of land in accessible and sustainable locations. • Infrastructure requirements arising from development are considered through the Local Plan evidence base, including infrastructure planning and engagement with infrastructure providers. Development proposals will be expected to contribute towards necessary infrastructure improvements where required as per policies. • WDC agrees on the importance of continued collaboration on strategic cross-boundary matters, including infrastructure	Further work has been undertaken to support and update the strategy and sites on the fringe. Including the approach to cross-boundary infrastructure. Policy SS1 updated as well as individual site policies

• There will be increased pressure on the road network; schools; healthcare facilities and traffic congestion.	planning, and will continue to engage constructively with TWBC and other neighbouring authorities through the Duty to Cooperate and ongoing strategic planning discussions.	
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Wartling Parish Council • Raise concerns regarding the scale and distribution of development within rural areas, particularly small settlements such as Wartling which have limited services, facilities, infrastructure and public transport • Requests that the spatial strategy recognises the particular constraints of smaller rural communities • Raise concerns about the cumulative impact of growth on infrastructure - local road network; drainage; healthcare and education and potential increase in car dependency given limited public transport within the parish. • Encourages continued engagement with parish councils.	• Concerns noted • WDC consider that Policy SS1 provides an appropriate framework to support infrastructure-led growth and the effective use of land in accessible and sustainable locations. • Infrastructure requirements arising from development are considered through the Local Plan evidence base, including infrastructure planning and engagement with infrastructure providers. Development proposals will be expected to contribute towards necessary infrastructure improvements where required as per policies. • WDC agrees on the importance of continued collaboration and continues to engage constructively with parish and town councils and the local community.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.
Fletching Parish Council • Objects to the concentration of growth at Uckfield/Maresfield – Owlsbury Farm and Ashdown Business Park extension.	• Objection and comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

• Requests that the Spatial Strategy be amended to direct major strategic employment, industrial and warehousing development to the south of the district, rather than the Uckfield/Maresfield area • Argues that the Spatial Strategy should take account of the wider regional context, including relationships with Eastbourne and other Housing Market Areas (HMAs), rather than focusing only on Wealden and FEMA boundaries • States that Eastbourne and the southern part of the district are more appropriate locations for strategic employment growth • Argues that evidence relating to HMAs and FEMAs suggests that Uckfield performs a more localised role and does not justify the district's largest housing and employment allocations	Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	
<u>Withyham Parish Council</u> • Broad support for the spatial strategy focusing development to the district's most sustainable settlements • Considers that, due to the environmental and infrastructure constraints affecting Withyham Parish, only limited and carefully managed growth is appropriate within the parish • Raises concerns regarding infrastructure capacity – highways network, congestion in Groombridge village, dependence on car travel,	• Broad support and comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

limited public transport accessibility and education. • Highlights concerns regarding surface water management, protection of streams and woodland, biodiversity networks and environmental impacts.	• WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	
Mayfield and Five Ashes Parish Council • Broad support for the principle of Policy SS1 but considers that the proposed growth strategy may not deliver sufficient housing. • Expresses concern that if the Local Plan cannot demonstrate that housing requirements are achievable, the Plan may be found unsound or fail at examination and leave the district open to speculative development proposals. • Supports the development boundaries for Mayfield and Five Ashes.	• Broad support and comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.
Warbleton Parish Council	• Objection noted	Evidence studies updated and consider matters raised and

• Object to the spatial strategy, stating that it would result in overdevelopment of rural settlements. • Suggest that a new town would better provide purpose-built infrastructure.	• The suggestion that a new settlement should form the basis of the spatial strategy is noted. The Council has considered a range of growth options through the plan-making process, including alternative development patterns, supported by the Sustainability Appraisal and wider evidence base. The merits and deliverability of different approaches have been assessed against a range of social, economic and environmental objectives. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	respond through updates to a combination of studies.

Danehill Parish Council • Questions whether the proposed spatial strategy is based on a realistic assessment of the capacity of existing utility infrastructure • States that the strategy appears to rely on the assumption that water supply infrastructure is compliant with statutory requirements, wastewater and sewage treatment infrastructure is operating effectively and compliantly and associated utility infrastructure has sufficient capacity to accommodate planned growth	• Comments noted • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.
Arlington Parish Council Supports the objective of retaining the character of existing settlements. • Considers that effective buffers should be maintained between existing settlements and new development to preserve local identity and distinctiveness. • Supports the protection of the countryside and agricultural land	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and	• No change required.

• Raises concerns regarding the flooding and drainage impacts of new development • Emphasises the need for development to be linked to well-connected centres that provide services and facilities for all age groups • Raises concerns regarding the impact of large-scale development on infrastructure – pressure on local highway network and capacity and resilience of water supply infrastructure.	employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Rotherfield Parish Council • Support Policy SS1.	• Support noted.	No change required.
Little Horsted Parish Meeting • Object to the overall scale of growth proposed in the Uckfield/Little Horsted area and considers the level of development disproportionately high compared with other parts of the district • States that growth should be significantly lower than the preferred strategy and closer to the alternative scenario • Supports only a modest, proportionate level of growth within Little Horsted, suggesting approximately 20-30 homes to meet local needs • Believes the Local Plan does not adequately recognise the environmental and infrastructure constraints of the Low Weald	• Objections noted • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing,	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

• Raises concerns regarding cumulative impacts from traffic and housing growth, Ashdown Forest mitigation measures, renewable energy infrastructure, BESS facilities and solar farms and Owlsbury	employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Heathfield and Waldron Parish Council • Support Policy SS1 in principle, subject to detailed consideration of specific housing and settlement-related matters. • Advises that if HEA10, HEA11 and HEA12 are intended to represent extensions to the relevant development boundaries, the Council would object to all three allocations.	• Broad support and comments noted • The purpose of development boundaries and site allocations is explained within the Local Plan and accompanying Policies Map • Where site allocations are proposed adjacent to existing settlements, the Council will review whether the supporting text and mapping clearly illustrate the relationship between allocations and development boundaries • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	No change required.
Uckfield Town Council • UTC supports only the lowest growth option, favouring the Alternative Scenario of fewer than 15,109 dwellings • Considers higher housing targets to be unrealistic, environmentally damaging and unsustainable, placing excessive pressure on	• Objections noted • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

Uckfield, surrounding villages, infrastructure, heritage assets and the natural environment • Opposes the concentration of growth in Uckfield and nearby villages simply because they lie outside major environmental designations, arguing this is not sustainable spatial planning	The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Wadhurst Parish Council • WPC considers the principle of having a spatial strategy acceptable, but believes Policy SS1 does not currently provide a coherent or clearly articulated spatial strategy • Considers that the supporting text contains important strategic considerations, but these are not adequately reflected in the policy wording itself. • Requests that Policy SS1 be redrafted so that it clearly sets out the spatial strategy and aligns with the reasoning contained within the supporting evidence and policy text. • Expresses concern that none of the growth options appear capable of delivering the level of housing identified through the Standard Method, creating a risk that the Local Plan	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

could be found unsound and leave the district vulnerable to speculative development. • Calls for the spatial strategy to include explicit recognition of the need to limit development within the High Weald National Landscape, protection of the setting of the South Downs National Park and National Landscape, international and national nature conservation designations, the Local Nature Recovery Network Strategy (LNRS) and associated mapping, and the protection and enhancement of environmental assets and ecological networks.	addressing environmental and infrastructure constraints. • Other policies within the Local Plan cover issues of landscape protection (NE6, NE7 and NE8) and nature conservation (NE1) and the Plan should be read as a whole.	
East Hoathly with Halland Parish Council • Argue the development strategy is not sustainable • Rural settlements lack the infrastructure to accommodate the scale of growth proposed. • Argue that housing delivery does not reflect local needs. • Raise significant infrastructure concerns about highway capacity (especially the congested A22 and rural roads), poor public transport, lack of safe walking and cycling routes, water supply, drainage, sewerage capacity, healthcare and education. • Scale of development threatens landscape character.	• Comments and objections noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

	addressing environmental and infrastructure constraints. • Other policies within the Local Plan cover issues of landscape protection (NE6, NE7 and NE8) and nature conservation (NE1) and the Plan should be read as a whole.	
Horam Parish Council • Object to Policy SS1 on the basis that it does not provide a clear or coherent spatial strategy • that the supporting text to the Local Plan contains important spatial strategy elements that are missing from Policy SS1 • Request SS1 is redrafted to include a stronger focus on locating most development in and around market towns and locations close to larger regional towns, especially those with good rail connections, only an appropriate scale of development in smaller settlements where services, facilities and public transport accessibility are sufficient and protection of the character and identity of settlements and the wider countryside • The Council also contends that an alternative spatial strategy should be considered, one that would significantly reduce the level of housing growth currently proposed for Horam.	• Objections noted • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.
Framfield Parish Council • Objects to further significant housing growth within the parish, arguing that it is inconsistent	• Objections noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

with a sustainable spatial strategy for a rural area • Argue that Policy SS1 should better recognise the capacity limits of rural settlements and avoid directing excessive development to locations that lack the infrastructure to support it. • Consider the Local Plan and spatial strategy fail to account adequately for the cumulative impacts of development. • Contend that villages and hamlets such as Framfield, Blackboys and Palehouse Common are not suitable for large-scale expansion because of limited infrastructure, their rural function and character and dependence on surrounding countryside. • Concerns raised on highways and transport capacity.	and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Chalvington with Ripe Parish Council • Generally supports Policy SS1 especially the concept of the 20-min neighbourhood, focusing growth in Type 1 and 2 settlements and the protection of rural landscapes, ancient woodland and ecological environments. • Believe the Local Plan should, wherever possible, avoid significant housing growth in lower-tier rural settlements (Types 4, 5 and 6) due to increased pressure on already strained infrastructure and services, additional traffic impacts on road network, limited access to	• Support welcomed • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

public transport, healthcare and education services.	• WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Frant Parish Council • Object to SS1. • Argue that the draft spatial strategy in Policy SS1 is inconsistent with its stated objective of limiting growth within the High Weald National Landscape (HWNL) due to landscape sensitivity. • Contend that Policy SS1 places an excessive amount of development within the High Weald National Landscape; is inconsistent with its own strategic objectives; lacks sufficient evidence, transparency and cumulative impact assessment and has not demonstrated that less harmful alternatives outside the National Landscape have been fully explored.	• Objections noted • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.
Isfield Parish Council	• Concerns noted	Evidence studies updated and consider matters raised and

• Raise concerns in relation to Policy SS1 – consider it to be unsound and inadequately justified as written. • Argue that Wealden is more strongly influenced by the Eastbourne and Tunbridge Wells HMAs and that Uckfield falls outside these and performs a more localised role – prominence in the strategy is therefore questionable. • Raise concerns over transport and accessibility in north of the district - there is no credible transport strategy to support the significant scale of development proposed around Uckfield • Raise concerns over environmental constraints in northern Wealden • Concerned that the Spatial Strategy places substantial reliance on the Owlsbury Farm allocation and the Ashdown Business Park Expansion – located close to Ashdown Forest.	• Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	respond through updates to a combination of studies. Policy SS1 wording has been updated.
Laughton Parish Council • Broadly agree with SS1. • Highlight perceived inconsistency between SS1 and proposed site options – states land outside development boundaries should be treated as countryside but seeks to allocated sites such as Land West of Hailsham and Laughton Park Farm (Halland) • Concerns raised over severe water stress and drinking water supply; increasing sewerage	• Concerns noted • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

pollution in waterway and declining condition of protected wildlife sites. • Infrastructure not aligned with proposed growth. • Major gaps in walking and cycling infrastructure. • Concern over lack of testing of alternatives.	constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints. • Alternative sites have been assessed through the Sustainability Appraisal.	
<u>Hailsham Town Council</u> • Broadly supports the overall approach Policy SS1. • Raise concerns over additional option sites in Table 6 which could deliver more than 8,000 additional homes to the 16,609 the SS is based on. • If all option sites were brought forward, total housing delivery could increase to approximately 24,600+ homes, significantly exceeding the housing figure that underpins SS1 • Consider that the implications of the additional option sites have not been properly assessed – could require changes to SS1 • Argue that further consultation is necessary on alternative growth and distribution scenarios	• Concerns noted • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

before stakeholders can provide a fully informed response to SS1 • Currently unclear how different settlements would be affected under different growth scenarios.	addressing environmental and infrastructure constraints. • Alternative sites and growth options have been assessed through the Sustainability Appraisal.	

Site Promoters	WDC Response	Changes made to policy/chapter
Batcheller Monkhouse • Objects to criterion 3 of Policy SS1 • Argues that all sites within development boundaries are considered sustainable due to their proximity to services and transport, there is no justification for prioritising PDL over greenfield sites within development boundaries and reference to PDL should be removed from Criterion 3. • Raises concerns that criterion 2(c) is linked to the Council's 20-minute neighbourhood concept and argues that the concept is impractical in rural areas and that expectations for enhanced active travel and public transport connections could affect the viability of development proposals. Request deletion of criterion 2(c).	• Comments and objections noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing	No change required.

	environmental and infrastructure constraints.	
Tor & Co / Tor and Company • Raise concerns that the policy is overly long and repetitive with duplication of national policy requirements. • The policy should explicitly confirm that all allocated development sites form part of the spatial strategy. • There is ambiguity regarding the relationship between development boundaries and site allocations, including whether all strategic employment allocations will be contained within development boundaries • Clarification is sought on the extent and location of the proposed Lower Horsebridge development boundary • Reconsider or clarify the role and weight of Criterion 9 in the context of future NPPF changes and housing land supply requirements.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	Lower Horsebridge now has a proposed development boundary as identified in policies map. Wording in relation to land outside development boundaries has been reviewed and updated.
Marrons • Supports the overall approach of Policy SS1 to focus development towards the most sustainable locations within the District.	• Support and comments noted. • The settlement hierarchy has been revised and updated to reflect changes in services and facilities and informs the spatial strategy.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

• Their main observation is that the evidence base should clearly justify the proposed settlement hierarchy, particularly the elevation of Heathfield, while ensuring that development opportunities in the principal towns are fully maximised.		
Genesis Town Planning • Raise concerns that Policy SS1 directs development to settlements with development boundaries but does not clearly identify specific locations. • Recommends that the principles set out in Paragraphs 3.10 and 3.11 should be incorporated directly into Policy SS1 to improve clarity and effectiveness	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.
Fairfax Acquisitions Limited	• Support noted.	No change required

• Support Policy SS1 and the inclusion of Owlsbury Farm as an allocation, stating that the site will make a significant contribution to housing need.		
Home Builders Federation • Considers that Policy SS1 should take a more positive approach to development within its general principles • Provided qualified support and suggested wording changes so that Policy SS1 supports development that enables complete, compact and connected neighbourhoods, rather than requiring all development to meet that standard in isolation. • Proposes an amendment to Criterion 2(c) so that it reads: "Support new development that enables our towns and villages to be 'complete, compact and connected neighbourhoods' which help provide health, social, environmental and economic benefits to our communities."	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	Policy SS1 wording has been updated.
Cochrane Strategic Development Limited	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the	This site was considered as a site for further testing. Evidence studies updated and consider matters raised and respond

• Supports the overall spatial strategy approach of directing growth towards the district's most sustainable settlements • Welcomes the Council's recognition of North West Hailsham as a potential growth location and supports its progression to a formal allocation at Regulation 19 stage • Highlights an inconsistency between Policy SS1 and the Policies Map - Policy SS1 supports development within settlement boundaries. North West Hailsham currently lies outside the proposed Hailsham development boundary despite being identified as a development option • Suggest reviewing the methodology for defining development boundaries to better reflect sustainable growth opportunities • Ensure the spatial strategy provides sufficient land allocations to meet the district's full housing needs.	Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	through updates to a combination of studies. No changes required in this regard.
<u>High Cross Investments (2023) Ltd</u> • Broadly support Policy SS1 but raise concerns about the practical application of the complete, compact and connected neighbourhoods principle for strategic sites adjacent to settlements.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and	Policy SS1 wording has been updated.

	employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	
<u>Wates Developments</u> • Supports the overall direction of the Spatial Strategy. • Supports the Council's assessment of alternative growth options and agrees with the principle that development should be focused on the most sustainable locations • Disagrees with the Council's conclusion that there is insufficient land available to fully meet housing needs • States that the Council should leave "no stone unturned" in seeking opportunities to increase housing delivery and meet identified housing needs in full	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

	housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints. • The Council has undertaken a no stone unturned approach to identifying sites.	
Newlyn Investments Limited • Framfield is designated as a sustainable village settlement within the settlement hierarchy, however no additional housing allocations are proposed within Framfield village itself. • The allocation strategy does not reinforce the role of Framfield as a sustainable settlement identified within the Council's evidence base	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	No changes required

BYond Homes Limited • Broadly agree with the strategy but suggest smaller settlements and smaller sites at Uckfield could provide alternatives.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	No changes required
Trustees of the Withyam Settlement c/o CLM Ltd • Support the settlement list but request careful consideration of development boundaries, including inclusion of proposed allocations HAR1 and HAR2 within Hartfield's development boundary.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport	Hartfield development boundaries does include development allocations HAR1 and HAR2.

	evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	
St Philips Land Limited • Support the updated Policy SS1 and referred to further representations submitted separately.	• Support noted.	No change required.
Gladman Developments Limited • Generally, supports the broad approach in SS1. • Consider that the plan will result in a significant under-provision of housing • Argues that the spatial strategy should take a more positive approach towards development located outside but adjacent to existing settlements	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

• Allow greater flexibility for sustainable development opportunities outside, but adjoining, settlements	meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	

Harvey & Son (Lewes) Ltd
 	
• Argue that Policy SS1 is overly restrictive towards lower-tier settlements and should
  ○ Allow appropriate growth in all settlement categories;
  ○ Support development adjacent to existing villages of all sizes;
  ○ Enable sustainable expansion of rural settlements where services, facilities and transport connections are present.
	• Comments noted
	• Policy SS1 has been prepared following consideration of a range of spatial growth options through earlier stages of plan preparation and seeks to balance the need for housing growth with the District's significant environmental constraints, infrastructure considerations, sustainability objectives, and national policy requirements.
	• Policy SS1 remains justified, effective and consistent with national policy.
		Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

Greymoor Homes • Strongly supports Policy SS1's identification of Crowborough as a Tier 1	• Support noted • The Council has carried out a detailed site assessment to identify all deliverable or developable options.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

settlement and argues that all suitable development opportunities around Crowborough, including Beechenwood Farm, should be given full consideration to help deliver sustainable growth.	• Sites assessments have been reviewed as part of the work for the Regulation 19 Local Plan.	
Esquire Developments • Broadly support Policy SS1 as it recognises the Council's efforts to increase site allocations to address housing needs • Support the principle of directing growth to sustainable settlements • Specific support is given to growth south of Tunbridge Wells • Question the level of windfall housing assumed in the housing supply, arguing it is insufficiently evidenced • Concerned that the strategy relies heavily on future development opportunities and unconfirmed allocations • Many potential allocations require further evidence and testing before they can be confirmed	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.
Elivia Homes	• Policy SS1 has been informed by an extensive evidence base, including the	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

• Supports the overall direction of Policy SS1. • Positively notes that the strategy does not rely solely on large strategic allocations, does not focus exclusively on the higher tier settlements and recognises opportunities for growth across a wider range of settlements • Supports housing growth in sustainable settlements, including Bells Yew Green • Raises a significant concern that the housing requirement underpinning the Spatial Strategy is too low.	Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
<u>Grassroots Planning</u> • Supports the Council's acknowledgement that a hybrid growth strategy is needed. • Supports directing growth away from the most constrained areas. • Objects to the current drafting of SS1 because it is insufficiently clear, justified and effective. • Seeks a stronger commitment to strategic-scale growth opportunities, particularly	• The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

Oakleigh Garden Community/Laughton Park Farm, as part of a revised and more robust spatial strategy.	Appraisal, including the site-specific assessment undertaken.	
Lewis & Co Planning / Harwood Properties Limited • Argue that Policy SS1 should provide greater flexibility for development on land adjoining settlement boundaries to help meet housing requirements. • The Polegate Station Car Park site is considered a highly sustainable location with strong public transport accessibility. • The site is capable of delivering substantially more housing than currently identified. • The next iteration of the Local Plan should allocate the site for a higher number of residential units to help address the District's housing shortfall.	• Comments noted. • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.
Dowsett Mayhew Planning Partnership • Support the overall direction of Policy SS1 – focusing growth in and around sustainable settlements, adjacent to major neighbouring towns and along key employment corridors. • Consider that SS1 is currently not sufficiently robust in meeting employment needs. • Seek stronger policy wording to ensure the Local Plan:	• Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints,	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

○ Fully meets employment land requirements. ○ Supports business growth and investment. ○ Aligns with national planning policy and NPPF objectives	infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Bellway Homes Strategic • Support the general approach of directing development towards the most sustainable settlements and locations. • Concern is raised about the overall soundness of the Plan because the key issue appears to be deciding how much growth from new settlements and major urban extensions will be required to meet housing need • Argue Criterion 9 is inconsistent with future national policy changes, is overly restrictive and does not reflect the emerging NPPF and NDMPs.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

	district whilst addressing environmental and infrastructure constraints	
Dandara Ltd • Supports the broad spatial strategy of focusing growth around sustainable settlements, adjacent to major regional centres such as Tunbridge Wells and Eastbourne and on sites that make efficient use of land. • Supports retaining and further testing the higher-growth spatial options that can meet development requirements. • Believes sustainable development within parts of the High Weald National Landscape may be justified where necessary to address housing need and where landscape impacts can be appropriately mitigated.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.
DHA Planning • Broadly supports the overall approach of directing development towards the most sustainable settlements and locations	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

• Concern raised regarding whether the strategy will deliver sufficient housing to meet requirements. • Concern is raised about the overall soundness of the Plan • Argue Criterion 9 is inconsistent with future national policy changes, is overly restrictive and does not reflect the emerging NPPF and NDMPs. • Amend Criterion 9 to avoid unnecessarily restricting development that could contribute towards housing delivery and 20-minute neighbourhood objectives.	Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
<u>Persimmon Homes South East</u> • Consider that Policy SS1 does not currently provide a clear, deliverable spatial strategy or properly reflect the preferred growth option identified through the Sustainability Appraisal. • Seek a more explicit policy that clearly identifies where strategic housing and employment growth will occur and confirms support for housing growth alongside employment development.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

	environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Turley / Martin Grant Homes • Support the overall spatial strategy and the general commitment to sustainable development set out in Policy SS1 • Argue that greater emphasis should be placed on Uckfield and Crowborough as the district's most sustainable locations for strategic growth • Supportive of Uckfield's designation as a Type 1 Settlement, but considers its role should be elevated within the settlement hierarchy due to its railway station and direct London service • Part 2(b) of the Policy should explicitly reference housing.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

	housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Taylor Wimpey • Broadly supportive of Policy SS1 and its spatial strategy • Specifically support growth at Uckfield • Object to the proposed plan period ending in 2042, arguing that it does not comply with national policy requirements. LDS indicates adoption in 2027/28 so the Local Plan should cover at least 15 years from adoption and therefore be extended to 2043.	• Support noted • The Plan will cover a 16-year plan period between 2026 and 2042.	No change required.
Arlington Stadium • Considers Policy SS1 unsound because it does not allocate enough land to meet identified housing needs and should be amended to include additional suitable and unconstrained sites, such as Arlington Stadium, to help address the housing deficit.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints,	No changes required.

	infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
ECE Planning • Supports Policy SS1's overall direction of growth towards sustainable settlements and neighbouring major centres, supports the inclusion of development within the High Weald National Landscape where justified, and encourages the Council to maximise housing delivery through the allocation of suitable sites, particularly around Tunbridge Wells and other sustainable locations	• Support noted and welcomed.	No change required.
Fernham Homes Operations Limited • Object to Policy SS1 as drafted because it does not adequately explain where growth will occur, fails to acknowledge the need for greenfield development, and is based on spatial strategy options that do not properly test realistic ways of meeting the district's full housing need.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

	and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Catesby Strategic Land Limited • Consider Policy SS1 unsound because it does not explicitly provide for the greenfield development needed to meet housing requirements, lacks clarity on the distribution of growth, and is based on an inadequate assessment of reasonable spatial strategy alternatives. • Seek revisions to provide a clearer and more realistic strategy capable of delivering housing needs in full.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

	• WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Ceres Property • Strongly supports Policy SS1 and believes its principles directly justify the allocation of their land at Hailsham (east of Summerhill Lane). • They argue that the site represents a logical, sustainable and well-contained extension to the settlement that aligns fully with the strategy of focusing growth in sustainable, less-constrained locations.	• Support noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing	No changes required.

	environmental and infrastructure constraints	
Framptons • Supports Policy SS1's spatial and economic strategy, particularly the provision of strategic employment growth, but emphasises that employment allocations should be focused on well-connected, sustainable locations capable of attracting inward investment and meeting both Wealden's and neighbouring Eastbourne's economic needs.	• Support noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.
Stantec UK Ltd • Supports Policy SS1's spatial strategy and sustainability principles but believes it should more clearly facilitate strategic	• Support noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic	No changes required.

growth at Hailsham through the allocation of North West Hailsham and corresponding amendments to the development boundary.	Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	
Moorfields Advisory Limited • Supports the overall principles of Policy SS1, particularly directing development towards the most sustainable settlements. • Concern raised that Part 9 is overly restrictive and may prevent otherwise sustainable development opportunities from coming forward • The policy could constrain development that would help create or support 20-	• Support welcomed. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

minute neighbourhoods, despite the Plan identifying this as a key objective • Concern that the hierarchy is static and does not recognise that planned growth can improve services, facilities and accessibility, increasing a settlement's sustainability over time • Policy wording should be reviewed to ensure consistency with forthcoming national planning policy changes expected in 2026.	meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints	

Other Consultee Bodies	WDC Response	Changes made to policy/chapter
Community Campaigner David Barton • Objects to the strategy due to limited focus on Traditional Architecture Design Codes, heritage protection and wider placemaking matters.	• Comments noted. • Design, heritage and placemaking matters are addressed through the wider policy framework and will be considered alongside Policy SS1 where relevant.	No change required
On the Go - Polegate High Street Shop • Support the aspirations of Policy SS1 but believe it is not being implemented effectively. • Argue that current development proposals in Polegate conflict with the strategy's	• Comments noted. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan and will be considered alongside Policy SS1 where relevant.	No change required

objectives for sustainable communities, town-centre vitality, infrastructure provision, accessibility and economic growth. • Seek stronger policy safeguards to ensure development is supported by timely infrastructure and does not undermine existing services, businesses and community facilities.		
English Regional Transport Association • Broadly supports the aspirations of Policy SS1 but believe it should be underpinned by stronger commitments to rail, public transport, cycling and walking infrastructure. • Consider improved sustainable transport networks essential to reducing congestion, meeting climate objectives, and supporting planned housing and economic growth across the district.	• Comments noted. • Infrastructure required to meet growth, including transport and sustainable transport infrastructure, is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan and will be considered alongside Policy SS1 where relevant.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.
Crowborough and District Chamber of Commerce • Support the policy and do not propose an alternative strategy in relation to the economy and town centres.	• Support noted.	No change required.
Rotherfield Protection Group • Support the draft spatial strategy and do not propose an alternative.	• Support noted.	No change required.

Dicker Residents Association • Support Policy SS1's settlement hierarchy approach and concentration of growth in larger, sustainable settlements, but stress the need to protect smaller villages, the countryside, and important landscape and environmental assets, including the Low Weald and areas at risk of flooding.	• Comments noted. • Issues relating to the countryside, landscape, the environment and flooding, are set out in policies within the Local Plan and will be considered alongside Policy SS1 where relevant.	No change required
Marks & Spencer PLC • Supports Policy SS1 and views it as providing an appropriate policy framework for the delivery of sustainable development, including its proposed Stone Cross food hall scheme.	• Support noted.	No change required.
RC • Objects on the basis that the strategy does not respond sufficiently to the decline in village facilities, shops, pubs, health services and local business premises. • Suggests high-quality development within walking distance of village centres.	• Objection noted. • The policy has been informed by an extensive evidence base, including the Sustainable Settlement Hierarchy which assesses a settlements level of services and facilities as well as its connection with larger settlements. This includes proximity of development by sustainable transport modes (walking, cycling and public transport. • All sites have also been assessed through the Sustainability Appraisal.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.
Mrs Tracey Hunter	• Support and comments noted. • Infrastructure required to meet growth, including transport and sustainable	No change required

• Supports the objectives of Policy SS1 but seeks a stronger focus on infrastructure capacity, infrastructure delivery, settlement separation and environmental constraints to ensure growth is genuinely sustainable and deliverable.	transport infrastructure, is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan and will be considered alongside Policy SS1 where relevant. • Issues relating to the environment are set out in policies within the Local Plan and will be considered alongside Policy SS1 where relevant.	
Firle Estate • Supports the overall direction of Policy SS1 and its focus on sustainable, high-quality development in the most sustainable settlements. • However, they consider that the plan does not currently allocate sufficient land to meet housing needs in full and therefore recommend identifying additional sites, including opportunities in sustainable villages with good public transport connections (such as Berwick Station).	• Support noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing	No changes required.

	environmental and infrastructure constraints	
Conservators of Ashdown Forest • Although the Conservators support the principle of concentrating development in sustainable settlements, they consider Policy SS1 unsound because it is not supported by an up-to-date HRA, lacks sufficient mitigation evidence, and could result in significant harm to Ashdown Forest and its ecological interests.	• Comments noted • An updated Habitat Regulation Assessment has been published alongside the submission version of the Local Plan	No change required.
ARBB Services • Objects to extending the Uckfield development boundary under Policy SS1 and seeks retention of the boundary at Snatts Road. • Argue that growth at White House Farm (UCK11) would result in the loss of countryside, harm landscape character, biodiversity, tourism and recreation assets, and undermine the separation and identity of Uckfield, Buxted and Maresfield.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and	Development boundary in the Ringles Cross area includes site allocation formerly known as UCK11. Development boundaries have been drawn on basis of settlements and their proposed growth.

	sustainable development across the district whilst addressing environmental and infrastructure constraints	
Community Project Ltd (Laughton Lodge) • Supports the broad objectives of Policy SS1 but seeks a stronger focus on active travel, cultural industries and sustainable connectivity, while raising concerns that the Council has not undertaken sufficient strategic assessment of alternative growth locations before considering major new settlement proposals.	• Comments noted. • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	No change required
Parkwood Hall • Oppose Policy SS1's proposed concentration of growth in the north of the district, arguing that it would harm the rural character of Frant and the High Weald National Landscape, place unacceptable pressure on infrastructure and services, and should instead be replaced by a more geographically dispersed approach to development across Wealden.	• Comments noted. • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

	Appraisal, including the site-specific assessment undertaken.	
Team Dynamics International • Opposes the application of Policy SS1 to the Frant/Tunbridge Wells area, believing it would harm the National Landscape and overwhelm local infrastructure. • Advocate redirecting growth towards Wealden's urban areas and brownfield sites where infrastructure and services are better able to support development.	• Comments noted. • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan.	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.
Clarity Ecoworks • Opposes Policy SS1 because the spatial strategy will be environmentally harmful, is inadequately supported by infrastructure, is overly reliant on accommodating growth linked to neighbouring authorities and is insufficiently responsive to local concerns and environmental designations such as the Pevensey Levels Ramsar site.	• Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

	employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan. • Environmental policies within the Local Plan will look to protect assets such as the Pevensey Levels and will be considered alongside Policy SS1 where relevant.	
Grovebridge Farm • Support in principle but query the inclusion of Lower Horsebridge as a settlement with a defined boundary where no boundary is shown.	• Comments noted. • Settlement and development boundary mapping has been checked and clarified through the policies map process.	Refer to Lower Horsebridge on the updated Policies map.
Laughton Self Store+ • Object to the policy as it does not meet national policy criteria	• Objection noted. • The Council has carried out a detailed site assessment to identify all deliverable or developable options	No change required.

• Suggest smaller developments in more appropriate brownfield locations with better transport, water and sewage infrastructure.	• The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	
CPRE Sussex • Supports the protective and sustainability-based principles within Policy SS1 but believes the scale and distribution of growth proposed fundamentally conflicts with those principles • Consider the Plan places excessive emphasis on housing delivery at the expense of environmental protection, infrastructure capacity and the wider strategic objectives of the Local Plan, risking an unsound and internally inconsistent strategy.	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments, the Sustainable Settlement Hierarchy and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing	Evidence studies updated and consider matters raised and respond through updates to a combination of studies.

	environmental and infrastructure constraints. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan. • Environmental policies within the Local Plan will look to protect assets such as the Pevensey Levels and will be considered alongside Policy SS1 where relevant.	
Railfuture Ltd • Broadly supports the spatial strategy in principle but believes Policy SS1 should more explicitly prioritise growth around existing and future rail stations to maximise sustainable transport opportunities and support investment in rail services.	• Support noted • Policy SS1 seeks to direct growth towards the district's most sustainable settlements, taking account of a range of factors including access to services, facilities, employment opportunities and public transport. Rail accessibility has formed part of the evidence underpinning the settlement hierarchy and spatial strategy.	No change required
Walk Wheel Cycle Trust • Broadly supportive of the sustainable development objectives underpinning Policy SS1 but seeks stronger recognition of strategic active travel corridors, particularly NCN Route 21, within the spatial strategy and supporting policies.	• Support welcomed and comments noted. • Policy SS1 is intended to provide a high-level spatial framework for the distribution of growth across the district rather than identify specific transport routes or infrastructure projects. Matters relating to active travel connectivity, walking and cycling infrastructure, and the delivery of	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

	transport improvements are addressed through other policies within the Local Plan and will also be considered through the planning application process and infrastructure delivery mechanisms.	
Inspired Villages Group • Supports the broad spatial strategy but considers Policy SS1 should be amended to explicitly recognise and positively support specialist accommodation for older people as part of meeting the district's future housing needs.	• Support welcomed and comments noted. • Housing needs for different groups are addressed through other policies within the Local Plan. The plan should be read as a whole and proposals will be required to comply with all relevant policies in the plan.	No change required
Green Weald Alliance • Insufficient justification for the chosen spatial strategy, particularly growth south of Tunbridge Wells. • Inconsistency between the treatment of development in the High Weald National Landscape and the rationale used to support it. • Frant allocations are considered overly reliant on services outside the local area. • Lack of alignment between the spatial strategy and the Local Plan's stated commitment to 20-minute neighbourhoods. • The spatial strategy should more clearly reflect sustainable locations with existing	• Comments noted. • Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Strategic Housing and Economic Land Availability Assessment, Employment and Economic Study, transport evidence, infrastructure assessments and environmental studies. The spatial strategy seeks to balance the need to meet identified housing and employment needs with environmental constraints, infrastructure capacity and the settlement hierarchy. • WDC considers Policy SS1 to be supported by the available evidence base and considers that it provides an	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

services, facilities and active travel opportunities	appropriate framework for delivering housing, employment growth and sustainable development across the district whilst addressing environmental and infrastructure constraints.	

Grouped Local Residents Summary		
Local Residents	**WDC Response**	**Changes made to policy/chapter**
• Many residents object to both the overall scale of housing growth and its distribution across the district, arguing that the level of development proposed for settlements such as Horam, Uckfield, Maresfield, Berwick Station, Frant, Hailsham and Cross in Hand is disproportionate to their size, character and capacity. • A recurring concern is the ability of infrastructure to accommodate growth, with respondents highlighting existing pressures on the road network, public transport, schools, healthcare provision, water supply, sewerage systems, drainage infrastructure, utilities and wider community facilities. • Numerous representations argue that the Council should place greater emphasis on developing brownfield sites, vacant properties, town centre locations and	• The Council notes the concerns raised regarding the scale and distribution of growth, infrastructure capacity, environmental impacts, the protection of the countryside and settlement character, and the suitability of specific proposed allocations. • The spatial strategy set out in Policy SS1 has been informed by an extensive evidence base, including the Sustainability Appraisal, Sustainable Settlements Study, Infrastructure Delivery Plan, Strategic Housing and Economic Land Availability Assessment (SHELAA), landscape evidence and environmental assessments. The strategy seeks to direct growth towards the district's most sustainable settlements, where access to services, facilities, employment opportunities and public transport is greatest, whilst taking	Evidence studies updated and consider matters raised and respond through updates to a combination of studies. Policy SS1 wording has been updated.

other previously developed land before releasing greenfield land or agricultural land for development • Significant concerns are also raised regarding the potential impact of growth on the district's environmental and landscape assets, including the High Weald National Landscape, settlement identity and gaps between settlements, ancient woodland, biodiversity, agricultural land, flood risk, carbon emissions and the wider rural character of Wealden. • A number of respondents specifically object to major proposed development locations, including Owlsbury Farm, Ashdown Business Park/Oakwood Park, Coxlow Farm, Budletts/Snatts Road, Berwick Station, Frant and sites around Hailsham. • While some respondents support the overarching objectives of creating sustainable, compact and well-connected communities, they considered that these principles are not reflected in the proposed pattern or scale of site allocations. • Alternative approaches put forward by respondents include: o Reducing the overall housing requirement;	account of environmental constraints and national planning policy requirements. • The Infrastructure Delivery Plan has informed the preparation of the Local Plan and identifies infrastructure requirements associated with planned growth. The delivery of infrastructure will continue to be supported through a combination of developer contributions, infrastructure providers and partnership working with relevant stakeholders throughout the plan period • The Local Plan has sought to maximise opportunities for development on suitable and available previously developed land where such opportunities exist. However, the availability of brownfield land within Wealden is limited and insufficient on its own to meet identified development needs • Development proposals will be required to comply with relevant policies relating to the High Weald National Landscape, biodiversity, flood risk, climate change, green infrastructure and the natural environment. Site allocations have been subject to detailed assessment through the Sustainability Appraisal and supporting evidence base.	

○ Adopting a more infrastructure-led approach to growth; ○ Distributing development more evenly across the district rather than relying on large strategic sites; ○ Strengthening protection of settlement gaps and the countryside; and ○ Focusing growth on locations that already benefit from rail connections, higher levels of service provision and established infrastructure.	• The Council notes objections to specific site allocations and alternative approaches suggested by respondents. These matters have been considered through the development of the spatial strategy and the assessment of reasonable alternatives. The Council considers that Policy SS1 provides an appropriate and balanced framework for directing growth in a manner that seeks to support sustainable development whilst responding to the district's housing, employment and infrastructure needs.	

Policy SS2: Provision of Homes

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 261	**Support:** 43	**Neutral:** 20	**Object:** 198

SS2: Provision of Homes		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council	• Comment noted. The Plan is read as a whole and a specific reference here is not considered wholly necessary.	No change required.

• Requests that paragraph 4.44 is amended to add "accessibility" to the final sentence.		
National Highways • Supports the draft policy. • Considers the method used to assess sustainable accessibility of settlements appropriate. • Requests consultation on the potential location of new housing development. • Notes the plan must consider cumulative impacts of development in neighbouring authorities.	• Support welcomed. • WDC continues to work with statutory providers as the Plan progresses.	No change required.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tunbridge Wells Borough Council • Does not support the policy. • Does not agree with Part 1 because the proposed scale of growth does not meet Wealden's full growth needs. • Considers that Wealden should seek to meet its growth needs in full. • Agrees with Part 2 of the policy.	• The Council has carried out detailed site assessments to identify all deliverable or developable options. • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	SHELAA sites reviewed as well as updates to other evidence studies to ensure growth needs are being met as far as possible.
Rother District Council • Supports the distribution of growth in principle, noting it is informed by the Council's SHELAA.	• Comments and support noted.	SHELAA sites reviewed as well as updates to other evidence studies

• Notes that the most significant impacts for Rother would be in settlements close to the district boundary, including Ninfield and Wadhurst. • Observes that the Local Plan proposes modest growth in these boundary areas compared with other areas of Wealden. • Welcomes continued working with Wealden on transport assessment impacts, including cumulative impacts on the A259 Strategic Road Network and secondary routes into Bexhill and northern Rother.		to ensure growth needs are being met as far as possible.
Eastbourne Borough Council • Recognises that meeting housing need is a significant issue across East Sussex and that Eastbourne cannot meet its own local housing need. • Agrees that Eastbourne and south Wealden share a housing market area and that Wealden offers the only opportunity to assist with Eastbourne's unmet housing needs. • Suggests further explanation may be needed to demonstrate exceptional circumstances for Wealden not meeting its own development needs. • Notes that 3,202 homes are proposed adjacent to Eastbourne, although most are commitments and 744 are newly allocated sites. • Identifies a possible summing error in Table 5 for Westham, where committed dwellings,	• Comments noted. • Error in Table 5 will be reviewed • The Council has carried out detailed site assessments to identify all deliverable or developable options. • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	SHELAA sites reviewed as well as updates to other evidence studies to ensure growth needs are being met as far as possible.

allocated dwellings and windfall allowance should total 1,197 rather than 1,228. • Considers that Crowborough and Heathfield should provide more homes as top tier settlements. • Raises concern regarding overreliance on windfall sites and lack of supporting evidence.		
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Westham Parish Council • Does not agree with the draft policy. • Considers Westham has the third largest proportion of new homes, which is out of keeping with the size of the parish. • Notes Wealden is constrained by National Landscape, SSSI designations and shortcomings in the road network. • Considers it unfair for Wealden to make up shortfall from other authority areas and raises concern about gridlock and out-commuting.	• Objection noted. • The settlement hierarchy will be reviewed as part of the work on the submission Local Plan • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Horam Parish Council • Does not agree with the draft policy and considers changes are needed. • Requests that Horam is changed to a Category 4 settlement. • Considers the number of dwellings should be reduced due to sustainability issues.	• Objection noted. • The settlement hierarchy will be reviewed as part of the work on the submission Local Plan • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.

	evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan	
Hellingly Parish Council • Considers changes are required to the draft policy. • Raises concern about overdevelopment where road infrastructure is insufficient, including in Hellingly. • Considers there is insufficient direct responsibility on developers to deliver medical and dental infrastructure. • Requests stricter policies to ensure developers deliver promised infrastructure.	• Objections noted • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan.	No change required.
Uckfield Town Council • Does not agree with the draft policy and considers changes are needed. • Raises concerns about site-specific housing policies and draft allocations in Uckfield. • Notes Uckfield is a key service centre for neighbouring villages and settlements, meaning proposed growth would add pressure to highways, utilities, education, medical, leisure and community infrastructure. • Highlights that the north of Wealden would take 7,542 of 15,729 homes, with Uckfield receiving	• Objection noted • The settlement hierarchy will be reviewed as part of the work on the submission Local Plan • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.

the majority of this proportion through 1,993 homes on 11 sites. • Questions whether the scale of proposed growth, including Owlsbury Farm, can be supported by existing facilities in Uckfield. • Raises concern that High Weald landscape characteristics and local constraints may be under-recognised. • Queries whether there should be a housing market area for Wealden alone and how landscape designations are weighted. • Considers brownfield development should be a greater priority. • Raises concern that flood risk and drainage issues in Uckfield are inadequately assessed.	• The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan.	
Maresfield Parish Council • Does not agree with the draft policy and considers changes are needed. • Considers 15,279 new houses to be excessive, particularly given Wealden's rural character and historic housing delivery position. • Raises concern that significant housing and employment allocations would adversely affect the rural character of the district, particularly in the north. • Questions the methodology and evidence supporting the windfall allowance of 46 dwellings in Maresfield. • Considers development at Owlsbury should be resisted due to impacts on Uckfield, landscape	• Objection noted • The settlement hierarchy will be reviewed as part of the work on the submission Local Plan • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.

and environment, and conflict with the Draft Local Plan and NPPF.	• The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan.	
Frant Parish Council • Does not agree with the draft policy and considers changes are needed. • Considers 15,279 new houses to be excessive given Wealden's rural character and historic housing delivery position. • Objects to the strategy of relying on a critical mass of development in sustainable villages to bring forward infrastructure, services and facilities. • Questions why villages are considered sustainable and notes that many residents commute outside their areas. • Considers housing proposed in Frant is likely to serve Tunbridge Wells rather than Wealden residents. • Questions the justification and realism of the 21-dwelling windfall allowance for Frant.	• Objection noted • The settlement hierarchy will be reviewed as part of the work on the submission Local Plan • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.

	• Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan.	
Laughton Parish Council • Does not agree with the draft policy and considers changes are needed. • Notes the LHNA was prepared before the latest NPPF changes, which make the standard method advisory. • Considers major housing in primary and secondary villages is not sustainable because of limited public transport and employment opportunities. • Considers the policy will not deliver affordable housing in areas where providers do not want homes. • Raises concern that infrastructure assessments show inadequate existing provision and do not address future need. • Considers required infrastructure is unlikely to come forward in a timely manner.	• Objection noted • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.
Herstmonceux Parish Council • Does not agree with the draft policy and considers changes are needed. • Raises concern about the Sustainable Settlements work and settlement hierarchy.	• Objection noted • The settlement hierarchy will be reviewed as part of the work on the submission Local Plan • The Council carried out significant assessment work to identify land to address its housing need, including the need for	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.

• Considers Herstmonceux is incorrectly described as having a good level of public transport. • Notes that the nearest accessible railway station should be identified as Polegate rather than Pevensey and Westham. • Identifies errors in the Local Plan regarding neighbourhood plans. • Considers proposed SHELAA sites in Herstmonceux Parish conflict with the Herstmonceux Neighbourhood Plan.	extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	
Pevensey Parish Council • Does not agree with the draft policy and considers changes are needed. • Raises concern that Pevensey Bay is excluded from development in Table 5 despite being recognised as a sustainable village. • Considers some windfall development could occur if flood risk policy is amended to allow small homes to meet local housing need. • Objects to the categorisation of Pevensey and Pevensey Bay as Type 2 urban settlements, noting limited evening bus services and overstated accessibility.	• Objections noted • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.

• Considers recognition should be given to windfall development within the Pevensey Bay development boundary.	• The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	
Chalvington with Ripe Parish Council • Agrees with the draft policy but suggests changes should be made. • Agrees that settlements with more services, facilities, public transport and accessibility are more sustainable for development. • Agrees that Chalvington and Ripe should be categorised as a Type 6 settlement. • Considers Chalvington with Ripe has received a disproportionate allocation of housing growth for a Type 6 residential settlement. • Requests that the windfall dwellings allowance of 12 is reduced.	• Support welcomed. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements and windfall. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations. .
Chiddingly Parish Council • Agrees with the draft policy. • Considers the policy responds to Government pressure and targets.	• Support welcomed. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.

• Considers the overall housing figure is excessive because the indigenous population is in decline. • Raises concern that growth is driven by migration from other areas and towns, adding pressure to infrastructure and increasing out-commuting.	Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	
Danehill Parish Council • Agrees with the draft policy but suggests changes should be made. • Is content with the detail proposed as it affects the parish. • Considers committed and windfall dwellings for the plan period to be acceptable for a Type 5 settlement. • Considers measures to protect the environment should be maintained. • Agrees with draft Policy NE5 on protecting Ashdown Forest SPA.	• Support welcomed	No change required.
Hailsham Town Council • Considers the Local Plan is misleading in terms of overall growth because some allocations titled within Hellingly effectively form part of Hailsham or extend the town.	• The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.

• Notes combined housing growth for Hailsham and Hellingly would be 4,183 homes, more than a quarter of district growth. • Raises concern that few allocations perform well against sustainability objectives, yet the Local Plan is silent on specifics despite this scale of growth. • Raises concern about transport links, the A22, congestion at key junctions, and the knock-on consequences of growth for Hailsham.	Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	
Heathfield and Waldron Parish Council • Agrees with the draft policy but suggests changes should be made. • Notes the target of 15,729 houses to 2040, averaging 955 per year, will need to be fully justified to the Inspector. • Welcomes the reduction from the Standard Method figure. • Considers the 2,000-property windfall allowance, including 155 in Heathfield and Waldron, appears excessive and disproportionate given community size, infrastructure constraints, landscape and other protections. • Requests further justification for the windfall allowance.	• Support welcomed. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.
Isfield Parish Council	• Support welcomed.	No change required.

• Agrees with the draft policy. • Agrees that Uckfield and its environs are significantly constrained by highways and biodiversity issues. • Supports the expectation of 9 windfall dwellings and considers the number should be no greater than that.		
Mayfield and Five Ashes Parish Council • Agrees with the draft policy but suggests changes should be made. • Considers the settlement hierarchy satisfactory and reflective of the capabilities and facilities of each settlement. • Notes the Plan fails to meet the full housing need of the district and considers either the Government target should be met or a convincing case made that it is not achievable. • Raises concern that there are no allocated dwellings but a windfall allowance of 51 dwellings for the parish. • Questions where windfall delivery will come from once development boundaries become fixed after plan adoption.	• Support welcomed. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	No changes required.
Ninfield Parish Council • Agrees with the draft policy. • Considers Ninfield should be treated as a Type 5 settlement rather than Type 4.	• Support welcomed • The settlement hierarchy has been reviewed as to support the Proposed Submission Local Plan.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.

• Considers Ninfield should not have any further allocated sites. • Raises concern about water pressure, parking and school place issues linked to existing and planned development.		
Polegate Town Council • Agrees with the draft policy but suggests changes should be made. • Agrees there should be sustainable growth and considers the lower housing figures should not be increased. • Considers towns where development is proposed should have enhanced or improved infrastructure before development takes place or before first occupation. • Considers expansion should not build on surrounding open space areas. • Raises concern about limited open space and lack of district-owned car parks in Polegate.	• Noted. An updated IDP has been produced to support the Proposed Submission Local Plan.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.
Rotherfield Parish Council • Agrees with the policy and considers no changes are needed. • Notes constraints on Rotherfield and tight development boundaries.	• Support welcomed	No change required.
Withyham Parish Council • Agrees with the policy and considers no changes are needed. • Acknowledges the need for housing and the pressures faced.	• Support welcomed	No change required.

Site Promoters	WDC Response	Changes made to policy/chapter
B Yond Homes Limited • Does not support the draft policy. • Raises concern about lack of information on which sites are treated as commitments. • Considers the policy fails to meet identified need and address district affordability issues. • Questions whether Wealden will meet shortfalls from neighbouring authorities. • Considers growth proposed in Heathfield and Crowborough is insufficient. • Raises concern about overreliance on windfall sites and lack of evidence to support the windfall allowance.	• Objection noted • The Council has carried out detailed site assessments to identify all deliverable or developable options. • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.
Mr and Mrs Batcheller (1259-3), Catesby Strategic Land Limited, Brian Dodd and Mr and Mrs Hawes (1006-3), Sifelle Limited, and Mr and Mrs Townsend (1269), represented by Batcheller Monkhouse • Question whether the standard method includes the 20 per cent uplift required due to under delivery over the previous three years. • Raise concern that no unmet need from adjoining authorities has been included. • Consider there are no exceptional circumstances to justify not meeting the standard method figure. • Consider the policy does not allow sufficient housing growth and that land should be identified to meet need in full.	• Concerns noted • The Council has carried out detailed site assessments to identify all deliverable or developable options. • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

Bellway Strategic (1087-4), Earlswood Homes Holdings Limited (1178-4), Fernham Homes (Sussex) Limited (1074-4), Fernham Homes Limited (1070-4), Hempstead Farm Limited (1088-4), James Fermor (1101-4), Obsidian Strategic Asset Management Limited (1085-4), Stonebond Properties (Sevenoaks) Limited and Akehurst Homes Limited (1073-4), Tarn (Mornings Mill) Limited (1515-3), and Tarn (Mornings Mill) Limited (1091-4), represented by DHA Planning/DHA Planning Limited • Consider the Council should plan to meet its full objectively assessed housing need given the acute shortage of housing and affordable housing in Wealden. • Raise concern that unmet needs from neighbouring authorities have not been properly addressed through the Duty to Cooperate. • Note the absence of a Housing Supply Topic Paper and question whether the supply relied on is deliverable. • Suggest applying a 10 per cent non-implementation rate to permissions relied on in Policy SS2. • Consider the 2,000-dwelling windfall allowance unrealistically high and request clarification on the evidence base.	• Concerns noted • The Council has carried out detailed site assessments to identify all deliverable or developable options. • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • Topic Papers will be published alongside the Submission Regulation 19 Local Plan as appropriate.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Boakes Land Projects • Does not support the draft policy.	• Objection and comments noted • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth

• Considers insufficient weight has been given to housing need, particularly within the National Landscape. • Considers policy should support small development near settlement boundaries where sustainability criteria can be met.	process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints.	needs are being met as far as possible.
Brookworth Homes Limited and Mr Reilly and Mr Howie (1080-2) • Consider the Plan fails to provide the appropriate housing target. • Consider the plan period should be extended to ensure at least 15 years after adoption.	• Comments noted • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints. • The Plan will cover a 16-year plan period between 2026 and 2042.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Castleford Homes Ltd • Supports draft Policy SS1 Spatial Vision for Wealden.	• Support welcomed.	No change required

Chilton Partnership • Does not support the draft policy. • Considers the housing requirement should be increased to meet local need in full. • Considers further allocations are needed.	• Objection noted • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken • The Council will review the SHELAA and all sites as part of the preparation of the submission Regulation 19 Local Plan to ensure growth needs are met within the district's constraints.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Christopher Newton (1095-2), David and Doreen Beattie (1096-2), and James Formolli (1097-2), represented by Dowsett Mayhew Partnership • Comment that the housing target should reflect need as a threshold rather than a target. • Consider Policy SS2 should be reworded to set a minimum threshold. • Seek flexibility for development in settlements and adjacent to settlement boundaries so additional windfall sites can come forward.	• Comments noted. • Policy wording reviewed.	SS2 policy wording updated.
Croudace Homes Limited • Considers the plan is not consistent with national policy in relation to the proposed windfall allowance.	• Comments noted. • These matters have been informed by the Council's evidence base and have been prepared in accordance with national policy and guidance.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth

• Considers the SHELAA fails to identify how constraints can readily be addressed. • Considers the housing requirement does not achieve the minimum requirement derived from national policy. • Considers the strategy is not appropriate when considered against reasonable alternatives. • Considers the housing requirement should be increased to at least 22,800 dwellings for April 2023 to March 2042. • Considers windfall allowance should be restricted to small previously developed sites accommodating up to 5 dwellings, equating to 66 dwellings annually.	• WDC considers that the housing requirement, site allocations and windfall assumptions are justified by the available evidence, taking account of local constraints, delivery considerations and forecast housing supply • The SHELAA identifies potential development opportunities and does not allocate sites. Site-specific constraints and mitigation measures have been considered through the site selection process and supporting evidence base. • Housing supply and site allocations will be reviewed as part of the Regulation 19 Local Plan preparation.	needs are being met as far as possible.
Dandara South East Ltd • Does not support the draft policy. • Objects to the proposed housing shortfall. • Considers detailed evidence is needed to support the proposed approach. • Considers assumptions for Owlsbury Farm are unrealistic. • Raises concern that Duty to Cooperate evidence does not identify specific meetings, actions and outcomes.	• Objections noted • The housing requirement and planned level of provision have been informed by national policy, the Council's evidence base and consideration of relevant environmental, infrastructure and delivery constraints. • WDC considers that the Local Plan is supported by a comprehensive and proportionate evidence base, including housing, infrastructure, viability, site assessment and sustainability appraisal evidence, which has informed the proposed strategy and allocations • The assumptions underpinning proposed allocations, including Owlsbury Farm, have been assessed through the plan-making process using available evidence on suitability, availability, achievability and	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

	deliverability. Detailed matters will continue to be considered through the examination process and any subsequent planning applications. • WDC has engaged constructively, actively and on an ongoing basis with neighbouring authorities and relevant prescribed bodies throughout plan preparation, and the outcomes of this engagement are documented within the supporting evidence base. • Housing supply and site allocations will be reviewed as part of the next iteration of the Plan.	
Deanland Wood Park Ltd • Does not support the draft policy. • Considers the policy fails to meet the housing target. • Considers the plan period should be extended by two years to ensure 15 years from adoption. • Considers the true shortfall in planned housing delivery must be acknowledged when assessing capacity, constraints and sustainable development. • Raises concern about lack of justification for the windfall allowance in the absence of the relevant topic paper. • Considers the windfall allowance is calculated inconsistently across the whole plan period and should only be counted from year 4.	• Objection noted • The housing requirement and planned level of provision have been informed by national policy, the Council's evidence base and consideration of relevant environmental, infrastructure and delivery constraints • The housing figure and windfall allowance has been updated upon the publication of the next iteration of the Plan. • The Plan will cover a 16-year plan period between 2026 and 2042.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

Esquire Developments and TWRFC • Supports draft Policy SS1 Spatial Vision for Wealden. • Raises concern about overreliance on historic windfall evidence and whether the proposed rate can be maintained. • Considers greater emphasis on social housing would better meet local need and support economic growth without adding pressure on Ashdown Forest, particularly within the Zone of Influence. • Supports directing development to towns and larger villages but considers other factors also need to be considered.	• Support welcomed. • The windfall allowance has been updated upon the publication of the next iteration of the Plan.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
The Estate of Jill Phillips • Does not support the draft policy. • Considers housing delivery over the plan period should include unmet need from Eastbourne. • Considers the Plan fails to allocate sufficient land to meet housing need. • Considers Chalvington and Ripe are adequate in sustainability terms and capable of hosting some residential growth.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Fairfax Properties • Does not support the draft policy.	• Objection noted. • The Council carried out significant assessment work to identify land to address	SHELAA sites reviewed as well as updates to other evidence studies including the settlement

• Considers the constraints used to justify under-provision of homes are not unique to Wealden. • Considers Wealden contains significant unconstrained land that could enable the full housing requirement to be provided. • Considers the housing target should be increased.	its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Firle Development; Anwyl Land; Matthew Marples, Albert Jonk, Sam Rajaratnam and Heather Rajaratnam (1082-3) • Do not support the draft policy. • Consider the level of housing provision should be increased to address the shortfall. • Raise concern that the windfall allowance is very high. • Consider delivery of all proposed allocations is improbable and that more sites should be identified.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Friends of Park Wood, Hellingly • Does not support the draft policy. • Considers an unsustainable number of homes are being planned. • Raises concern about unsuitable and overstretched infrastructure.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations.

• Raises concern about lack of affordable homes.	Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	
Gladman Development Limited • Does not support the draft policy. • Raises concern about the impact of under-provision on affordability, affordable housing delivery and energy efficiency of homes. • Considers the Council should be proactive and pragmatic in seeking to increase housing delivery in the longer term. • Considers the use of settlement limits to restrict suitable edge-of-settlement development would not accord with the positive approach to growth required by national policy.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Greymoor Homes • Does not support the draft policy. • Considers the shortened plan period underestimates Wealden's own housing needs before addressing neighbouring authorities' unmet needs. • Notes that no housing trajectory has been included. • Considers the Council is positively planning not to meet housing need.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Raises concern about lack of evidence for a robust plan.	• The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base. • The Plan will cover a 16-year plan period between 2026 and 2042.	
Grosvenor Property UK Limited • Does not support the draft policy. • Considers the plan period should be extended at least to 2042 and that a 20-year plan should be considered. • Objects to the proposed housing target. • Considers significant unmet needs from surrounding areas are not being addressed. • Considers Wealden should address future housing need and past under-delivery. • Identifies a need for larger-scale long-term sites. • Considers the Council should target delivery above housing need.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base. • The Plan will cover a 16-year plan period between 2026 and 2042.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Hertfordshire Holdings • Considers the Plan should plan for and meet objectively assessed housing need, including unmet need from neighbouring authorities.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

	• The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	
Home Builders Federation • Does not support the draft policy. • Considers the plan period should be extended to 2042. • Considers unmet needs from neighbouring areas should be reflected in the housing target, evidence and Sustainability Appraisal. • Raises concern that the transport evidence did not test a higher level of housing delivery before concluding transport is a constraint. • Considers the Council should examine potential for increased modal shift to sustainable transport. • Requests a housing trajectory for allocated sites and committed development. • Considers insufficient growth is proposed in rural communities. • Considers the Plan should allocate 10 per cent of homes on small sites.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base. • The Plan will cover a 16-year plan period between 2026 and 2042. • The SA and evidence base tests higher levels of housing delivery.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Hop Farm Real Estate Limited and Nevill Estate Company, represented by Julian Black • Do not support the draft policy. • Consider the proposed figure is a considerable reduction from the standard method requirement.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Consider the reduction is not based on any exceptional demographic reason advised by Government policy. • Consider the Council is failing to deliver sufficient homes, worsening house prices, infrastructure provision and affordable housing. • Consider the Duty to Cooperate has failed to address needs from adjoining councils including Eastbourne, Lewes and Tunbridge Wells. • Consider more allocations should be added, particularly in the Low Weald around Stone Cross and in the north of the district.	Appraisal, including the site-specific assessment undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base. • The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. At present, there is no agreed requirement for Wealden to accommodate unmet housing need arising from neighbouring authorities. The Local Plan has therefore been prepared to meet Wealden's own objectively assessed needs and development requirements.	
Martin Grant Homes and Hardcourt Developments • Note the shortfall in addressing the housing requirement and the commitment to carry out further work. • Consider there is a compelling case for further land to be allocated at Uckfield to help meet unmet housing need in a sustainable location with existing and potential enhanced rail connectivity.	• Comments noted. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Nigel Hobbs and ASP, represented by ASP • Do not support the draft policy. • Consider housing provision is too small. • Consider allowance should be made for non-delivery of planned homes.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth

• Consider there is no valid justification for under-provision. • Consider the Council should seek to meet housing need in full. • Consider there is no reason why the Plan should not make an allowance for some of Eastbourne's unmet need.	evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base. • The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. At present, there is no agreed requirement for Wealden to accommodate unmet housing need arising from neighbouring authorities. The Local Plan has therefore been prepared to meet Wealden's own objectively assessed needs and development requirements.	needs are being met as far as possible.
Ninfield Developments Limited • Considers neighbouring authorities with similar environmental constraints are seeking to meet their needs and that Wealden should do the same. • Raises concern about inconsistency between the location of constraints and where allocations are directed. • Considers development should be directed away from settlements dependent on the A22 and A26. • Raises concern about overreliance on windfall allowance, particularly in Ninfield.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Considers there is conflict between the stated constraints to housing development and the proposed distribution of housing.	• The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. At present, there is no agreed requirement for Wealden to accommodate unmet housing need arising from neighbouring authorities. The Local Plan has therefore been prepared to meet Wealden's own objectively assessed needs and development requirements.	
Persimmon Homes South East • Does not support the draft policy. • Considers the plan period should be extended to allow 15 years from adoption and that additional allocations are needed. • Raises concern that highways constraints are identified before testing has been carried out. • Considers evidence should assess increasing modal shift to more sustainable transport and improving public transport. • Considers local housing need should be increased to address Wealden's need and unmet need from neighbouring authorities. • Raises concern about affordability, significant affordable housing need, and the record of under-delivery. • Considers the Sustainability Appraisal does not adequately address under-delivery, a housing buffer, or unmet need from adjoining authorities.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base. • The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. At present, there is no agreed requirement for Wealden to accommodate unmet housing need arising from neighbouring authorities. The Local Plan has therefore been prepared to meet	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Raises concern about lack of robust and up-to-date Duty to Cooperate evidence, including limited progress on memoranda of understanding or statements of common ground.	Wealden's own objectively assessed needs and development requirements.	
Real Select Limited • Does not support the draft policy. • Considers there is no clear spatial strategy, resulting in limited allocations in the most sustainable locations. • Raises concern that the windfall allowance forms a large proportion of proposed housing provision.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Real Estate Land Limited • Does not support the draft policy. • Considers housing delivery over the plan period should include unmet need from Eastbourne. • Considers the Plan fails to allocate sufficient land to meet housing need. • Considers the Plan fails to recognise the sustainability of Laughton.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

	publication of the next iteration of the Plan, along with the supporting evidence base. • The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. At present, there is no agreed requirement for Wealden to accommodate unmet housing need arising from neighbouring authorities. The Local Plan has therefore been prepared to meet Wealden's own objectively assessed needs and development requirements.	
Richborough • Does not support the draft policy. • Considers unmet need from neighbouring authorities should be considered in addition to the Council's minimum housing need. • Considers a capacity-based housing requirement is contrary to national policy. • Considers more should be done to secure homes suitable for an ageing population and specialist housing needs. • Considers additional allocations are necessary and that sufficient land supply exists. • Raises concern that transport evidence did not consider a higher level of housing delivery. • Questions why Polegate is not a Type 1 settlement. • Considers Duty to Cooperate engagement does not go far enough and that southern	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base. • The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. At present, there is no agreed requirement for Wealden to accommodate unmet housing need arising	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

settlements are appropriate locations to help meet Eastbourne's unmet need. • Considers additional allocations must be found up to the end of the plan period and that the policy should explicitly reference the settlement hierarchy.	from neighbouring authorities. The Local Plan has therefore been prepared to meet Wealden's own objectively assessed needs and development requirements. • Other policies within the Plan deal with specialist housing needs (HO11 and HO12).	
Sedas Strategic Land • Considers the Local Plan review fundamentally fails to deliver against the standard methodology calculation objective.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Sigma Strategic Land • Does not support the draft policy. • Raises uncertainty about unmet needs of neighbouring local planning authorities, making it difficult for the emerging Local Plan to plan effectively. • Considers a higher dwelling figure is required to address affordable housing need. • Considers further allocations will be necessary.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Considers closely drawn development boundaries do not allow delivery of windfall development. • Raises concern about inconsistent treatment of Rotherfield compared with other Type 4 settlements.	publication of the next iteration of the Plan, along with the supporting evidence base. • The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. At present, there is no agreed requirement for Wealden to accommodate unmet housing need arising from neighbouring authorities. The Local Plan has therefore been prepared to meet Wealden's own objectively assessed needs and development requirements.	
South West Strategic Developments • Does not support the draft policy. • Considers the Council should explore innovative ways to meet employment and housing requirements, including a new garden community. • Raises concern about lack of evidence for the windfall allowance, including that it is too high, supply is reducing, and many sites arise from appeal decisions. • Considers the objectively assessed need does not robustly consider unmet needs of adjacent areas. • Considers the adopted housing figures do not meet even the minimum need figure when unmet needs are ignored. • Considers the windfall allowance should be reduced to a more reasonable level.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base. • The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. At present, there is no agreed requirement for Wealden to accommodate unmet housing need arising	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

	from neighbouring authorities. The Local Plan has therefore been prepared to meet Wealden's own objectively assessed needs and development requirements.	
Taylor Wimpey UK Ltd and Taylor Wimpey • Consider the level of development identified in the policy falls significantly short of the objectively assessed need. • Consider the Plan should address current under-provision. • Consider emphasis should be placed on securing the most efficient use of allocated sites. • Consider there is a compelling case for further land to be allocated at Polegate to help meet unmet housing need and assist Eastbourne with unmet need. • Consider options for growth on the western edge of Polegate should be re-explored before directing growth to less sustainable lower tier settlements.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Terra Strategic • Raises concern that the Council is not being ambitious enough given the scale of the housing shortfall over the plan period. • Considers all sites should be maximised to make best use of land.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

	• The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	
The Pickering Family Group Sipp • Does not support the draft policy. • Considers the quantum of housing is not appropriate to meet the district's need. • Raises concern about lack of robust assessment to justify lower provision. • Considers any reduction arising from National Landscapes or protected habitats must be robustly assessed.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Trafalgar Group Limited • Considers the proposed level of housing is significantly lower than identified need. • Considers historic delivery rates, significant unmet need from neighbouring authorities and the affordability crisis justify significantly boosting housing delivery. • Considers sustainable, available and readily available sites should be allocated to reduce reliance on larger sites.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

Victoria Groves, represented by David Neame • Does not support the draft policy. • Considers the LHNA 2021 should be updated to reflect current evidence. • Notes the Housing Supply Topic Paper is missing from the evidence base. • Considers the Council has not provided evidence to support the lower housing requirement and should plan to meet full local housing need as a minimum. • Considers the uncapped standard method figure should also be tested given the scale of need and poor housing delivery record. • Considers further allocations are required. • Raises concern about the absence of a housing trajectory, delivery evidence, five-year housing land supply evidence and justification for the windfall allowance.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Robert Vine, represented by Naked Vine Limited • Considers the Council should plan to meet its full objectively assessed housing need given the acute housing and affordable housing shortage in Wealden. • Raises concern that unmet needs from neighbouring authorities have not been properly addressed through the Duty to Cooperate. • Notes the absence of a Housing Supply Topic Paper and questions whether the supply relied on is deliverable.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Suggests applying a 10 per cent non-implementation rate to permissions relied on in Policy SS2. • Considers the 2,000-dwelling windfall allowance unrealistically high and requests clarification on the evidence base.	publication of the next iteration of the Plan, along with the supporting evidence base. • The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. At present, there is no agreed requirement for Wealden to accommodate unmet housing need arising from neighbouring authorities. The Local Plan has therefore been prepared to meet Wealden's own objectively assessed needs and development requirements.	
Vistry Group and Reinar Properties Limited, represented by Savills • Do not support the draft policy. • Consider the Plan fails to allocate sufficient land to meet the standard method figure. • Consider the Plan fails to accommodate need from neighbouring authorities. • Consider further sites need to be identified to meet housing need and include a buffer for non-implementation and non-delivery from strategic allocations and other sites.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base. • The Council has engaged constructively with neighbouring authorities through the Duty to Cooperate and ongoing strategic cross-boundary discussions. At present, there is no agreed requirement for Wealden to accommodate unmet housing need arising	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

	from neighbouring authorities. The Local Plan has therefore been prepared to meet Wealden's own objectively assessed needs and development requirements.	
Wates Development • Does not support the draft policy or the overall housing requirement due to the significant shortfall against Wealden's and neighbouring authorities' needs. • Raises concern about lack of allocation to Framfield despite its sustainability credentials and the benefits of new housing. • Considers the housing requirement does not accord with the standard method calculation. • Questions why the plan period starts mid-year and considers the plan period should be extended to ensure 15 years from adoption. • Considers under-delivery will have negative effects including reduced housing delivery, increased homelessness, inadequate accommodation and reduced affordable housing delivery. • Raises concern that limited affordable housing delivery will be compounded by reliance on windfall sites. • Considers Policy SS2(2) repeats Policy SS1 and is unnecessary.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Michael Whitlam, represented by Martin Hull • Does not support the draft policy.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent

• Considers the number of homes required should be increased. • Raises concern that there is no robust assessment to justify lower provision. • Considers the evidence base should examine the scope for further housing sites on settlement edges, including within the National Landscape. • Considers the policy should be flexible.	extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	allocations to ensure growth needs are being met as far as possible.
Mr Williams (1270-2) • Considers a robust and accurate understanding of supply and shortfall over appropriate timescales will be required for the Local Plan examination. • Considers it is unclear how the proposed distribution of housing growth by parish interrelates with neighbourhood planning. • Suggests it may be more relevant to provide housing distribution by settlement rather than by parish.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Conservators of Ashdown Forest • Does not support the draft policy. • Considers there is insufficient Suitable Alternative Natural Greenspace capacity to accommodate the proposed allocations.	• Objection noted. • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying	Further work has been undertaken in respect of SANGs, HRA and other related matters. Relevant policies updated accordingly.

• Considers the Plan should include a presumption against development within the 7 kilometre zone of influence of Ashdown Forest. • Raises concern about lack of reference to social housing. • Considers housing should support local demand rather than inward migration within the zone of influence.	evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • The housing figure and SHELAA sites will be reviewed and updated if required on the publication of the next iteration of the Plan, along with the supporting evidence base. • An update Habitat Regulation Assessment has been published alongside the submission version of the Local Plan as well as further work on SANGs provision.	
Dicker Residents Association • Supports draft Policy SS2 Provision of Homes. • Considers more emphasis is needed on affordable housing.	• Support welcomed. • Policy HO8 deals with affordable housing provision, and the plan should be read as a whole.	Policy HO8 has been updated.
Eastbourne Eco Action Network CIC • Does not support the draft policy. • Suggests reviewing schemes from adjacent areas, such as the Phoenix development in Lewes. • Considers modular builds should be considered to reduce waste.	• Objections noted. • Suggestions considered as part of the ongoing work on housing mix/type.	No change required.
Rotherfield Protection Group • Supports the draft policy. • Supports the capacity-based approach to housing delivery.	• Support welcomed	No change required.

• Considers adequacy of local services and infrastructure to accommodate development pressure must be fully addressed. • Supports provision of homes within development boundaries.		
Transport Futures East Sussex • Supports the draft policy. • Considers the Council should take a stronger lead in building and renting new homes. • Notes that support for electric vehicle rollout will help reduce the impact of existing trips, but public transport also needs to be improved.	• Support welcomed	No change required
Wealden Food Partnership • Considers that when housing development is proposed on farmland, countryside land or land on the edge of towns and villages, infrastructure impact should be treated as very important. • Considers food security should be added as a consideration in all developments.	• Comments noted. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan.	No change required.
Willingdon Residents' Association • Raises issues about the demographics of those moving into or growing up in the area. • Raises concern about pressure on affordable housing for younger and older residents.	• Concerns noted.	No change required

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents • Many residents do not support Policy SS2, raising concerns that overall housing numbers are either too high for local communities or insufficiently justified where the Plan falls short of assessed need. • Concerns were raised that housing growth is directed to unsustainable locations, including smaller villages with limited services, employment, public transport and active travel options. • Residents raised location-specific concerns regarding East Hoathly, Horam, Berwick Station, Maresfield, Westham, Ninfield, Pevensey, Fletching and other settlements, including challenges to settlement hierarchy classifications and the scale of growth proposed. • Strong concerns were raised about infrastructure capacity, including highways congestion, public transport, schools, healthcare, drainage, water pressure, community facilities and timing of infrastructure delivery. • Residents raised concerns about impacts on village character, rural landscape, greenfield land, agricultural land, protected habitats, biodiversity, flood risk and the wider environment. • Several comments objected to overdevelopment and disproportionate growth in particular settlements, stating that development should be	• WDC acknowledges the wide range of concerns raised. • The housing requirement and spatial strategy have been informed by national policy, the Council's evidence base, sustainability considerations and the significant environmental and infrastructure constraints that affect the district. • The spatial strategy seeks to direct growth to the most sustainable locations while providing a balanced distribution of development across the district. The Council has considered the role, function and capacity of settlements, together with site-specific evidence, when determining the scale and location of proposed growth. Alternative approaches have been assessed through the Sustainability Appraisal process and site selection work • Infrastructure planning has informed the preparation of the Local Plan, supported by engagement with infrastructure providers and the Infrastructure Delivery Plan. Development will be required to contribute towards necessary infrastructure and mitigation measures, with detailed impacts assessed through future planning applications. • The Plan includes policies to protect and enhance environmental assets, secure appropriate infrastructure, and deliver a range	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

proportionate to settlement size and local capacity. • Concerns were raised that new homes may not meet local needs, with repeated requests for more affordable housing, social housing, smaller homes, starter homes, homes for older people and homes accessible to local residents. • Some residents supported a capacity-based approach or lower housing figure, arguing that Wealden's environmental and infrastructure constraints justify not meeting the full standard method figure. • Other residents and respondents argued that the Council should meet housing need in full, including through additional sites, increased density, brownfield land, small sites, settlement-edge development or more proportionate distribution across the district. • Concerns were raised about reliance on windfall development, lack of clarity on housing supply evidence, uncertainty around unimplemented permissions, and the need for robust evidence at examination. • Some comments opposed Wealden accommodating unmet need from neighbouring authorities, while others stated that the Plan should better address unmet need through the Duty to Cooperate. • Residents requested greater clarity on matters including 20-minute neighbourhoods, brownfield land, electric vehicle charging, settlement categories, housing distribution by parish or	of housing types, tenures and affordable homes • WDC will review matters relating to housing supply, windfall assumptions, unmet need, settlement hierarchies and infrastructure delivery through the production of the Submission Regulation 19 Local Plan.	

settlement, and how infrastructure will be secured.		

Focused Local Plan Consultation

Total: 374	**Support:** 32	**Neutral:** 14	**Object:** 328

SS2: Provision of Homes		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Southern Water • Advises that water companies plan investment using adopted local plan forecasts and housing trajectories. • Notes that wastewater networks can be constrained during storm periods where groundwater and surface water occupy capacity and stresses the need for sustainable development to separate surface water from foul wastewater.	• Comments noted. • WDC will continue to engage and work with Southern Water on infrastructure matters and development at the strategic level. • Surface water and sustainable drainage are considered through Policy CC8, infrastructure evidence and development management.	No change required.
National Highways • Supports Policy SS2's focus on directing development to the most sustainable settlements, consistent with Circular 01/2022 • Advises that the Local Plan should consider the cumulative impacts of development in neighbouring authorities	• Support and comments noted • WDC will continue to engage with National Highways and other transport bodies • Cross-boundary transport impacts are being considered through ongoing engagement under the Duty to Cooperate and through the preparation	Further transport focused evidence base work has been undertaken and informs the Regulation 19 version of the Local Plan.

• Requests that Transport Assessments (TAs) be required for any site likely to affect the Strategic Road Network (SRN) and that this should be explicitly reflected within Policy SS2 • Emphasises that the scale and distribution of growth should be supported by appropriate and proportionate transport evidence.	of the Local Plan evidence base, including strategic transport modelling • The Council agrees that development proposals with the potential to affect the Strategic Road Network should be supported by appropriate transport evidence. Requirements for Transport Assessments and Transport Statements are set out through national planning policy and will be applied at the planning application stage where development proposals meet the relevant thresholds or are likely to generate significant transport impacts, including impacts on the SRN • It is not considered necessary for Policy SS2 itself to include a specific requirement for Transport Assessments, as this matter is addressed through national policy, supporting development management policies (INF2 and site specific allocations as appropriate) within the Local Plan, and statutory consultation with National Highways on relevant planning applications.	
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Brighton and Hove City Council • Raises concern that the draft Policy SS2 housing target of 16,609 dwellings is significantly below the assessed housing need	• The housing target has been informed by a comprehensive assessment of environmental, infrastructure, and other planning constraints affecting the	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure

for the district - insufficient to meet Wealden's housing needs. • Emphasises that all housing supply options should be fully explored in Wealden – including unmet need of neighbouring LPAs. • Suggests Wealden should seek to address both its own housing needs and unmet housing needs arising from neighbouring authorities where possible.	district, alongside the requirements of national policy • The Council considers that the Plan has appropriately explored reasonable housing supply options through the site assessment process and that the housing provision proposed in Policy SS2 represents the most sustainable and deliverable strategy for the plan period.	growth needs are being met as far as possible.
South Downs National Park Authority • Comments relate to development option ORL1 Land West of Hailsham, Arlington & Hailsham • Requests further assessment of the site's impacts and careful consideration of its location, capacity and design. • Emphasises the need to ensure that development conserves and enhances the setting of the South Downs National Park and meets the National Park's statutory purposes.	• Comments noted • Option sites have been subject to further assessment in light of updated evidence bases including landscape.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible. Revised wording has been incorporated into policies to respond to these comments.
Eastbourne Borough Council • Agrees that Eastbourne and southern Wealden form a distinct Housing Market Area (HMA). • States that both authorities should seek to meet housing needs arising within that HMA. • Requests that, if further strategic growth is pursued around Polegate (Option 3), allocations adjacent to Eastbourne should be	• Comments noted. • The Council will continue to engage with Eastbourne Borough Council through ongoing duty to cooperate discussions on housing need, capacity and cross-boundary implications as the plan progresses.	No change required. Continue engagement with Eastbourne Borough Council and consider unmet need evidence

attributed towards meeting Eastbourne's unmet housing need. • Requests that Wealden continues to engage constructively on unmet housing need and considers whether any of Eastbourne's unmet need can appropriately be addressed through the Local Plan.		
Rother District Council • Notes that RDC has formally requested assistance from neighbouring authorities, including Wealden, to help address its unmet housing need. • Agrees that Wealden does not have a strong housing market relationship with Rother, consistent with evidence in the joint Hastings and Rother HEDNA Update (2024). • Confirms that RDC is not in a position to accommodate unmet housing needs arising from Wealden. • References ongoing discussions between the two authorities through the Duty to Cooperate process regarding housing needs and capacity constraints.	• Comments noted. • The Council will continue to engage with Rother District Council through ongoing duty to cooperate discussions on housing need, capacity and cross-boundary implications as the plan progresses.	No change required. Continue engagement with Rother District Council and consider unmet need evidence
Hastings Borough Council • Confirms HBC's commitment to ongoing cross-boundary cooperation with Wealden. • Supportive of Wealden's approach to identifying housing supply and committed to	• Support noted. • The Council will continue to engage with Hastings Borough Council through ongoing duty to cooperate discussions on housing need, capacity and cross-boundary implications as the plan progresses.	No change required. Continue engagement with Hastings Borough Council and consider unmet need evidence

ongoing cooperation on strategic planning matters.		
East Sussex County Council • No specific objections or comments raised regarding the level or distribution of housing provision • Comments related to development proposals to be supported by Ecological Impact Assessment (EcIA) and Ecological Constraints and Opportunities Plan (ECOP); for major development to be supported by a desk-based Heritage Impact Assessment, including use of Historic Environment Record (HER) data and for non-major development sites within Archaeological Notification Areas, heritage assessment requirements should be established through consultation with the County Archaeologist at the pre-application stage.	• Comments noted. • These issues are addressed within the relevant policies within the Local Plan.	No changes required.
Tonbridge and Malling Borough Council • Raise concerns that Policy SS2 does not meet Wealden's full housing need to 2042 • Questions the basis of Wealden's request for assistance in accommodating unmet housing need, stating that evidence does not support an overlap between the West Kent HMA and Wealden's HMA • TMBC advises that its own Local Plan preparation is advanced and it is not in a	• Comments noted. • The Council will continue to engage with Tonbridge & Malling Borough Council through ongoing duty to cooperate discussions on housing need, capacity and cross-boundary implications as the plan progresses.	No change required.

position to delay its programme to consider assisting with Wealden's housing shortfall. • Consider it unclear what scale of unmet need neighbouring authorities are being asked to accommodate, given ongoing.		
<u>Tunbridge Wells Borough Council</u> • Object to Policy SS2 as it does not meet Wealden's identified housing need in full over the plan period • Agrees in principle with directing development to sustainable locations but considers the suitability of sites near the borough boundary is heavily dependent on the role and services of Royal Tunbridge Wells. • Considers WDC has not demonstrated how the necessary supporting infrastructure will be delivered to accommodate development in these locations. • Objects to the proposed housing sites adjacent to the Tunbridge Wells boundary. • Raises strong concerns regarding the cumulative impacts of approximately 657 dwellings proposed close to the borough boundary.	• Comments and objections noted. • The Council will continue to engage with Tunbridge Wells Borough Council on cross-boundary impacts, including housing need, infrastructure capacity, transport, water supply, service provision and landscape considerations.	Further work has been undertaken to support the policy approach in respect of sites south of Tunbridge Wells, as well as policy wording changes in respect of the approach to infrastructure. Continue engagement with Tunbridge Wells Borough Council and consider unmet need evidence.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
<u>Fletching Parish Council</u> • Objects to Policy SS2 where it relies on the Owlsbury Farm allocation.	• Objection noted • The Council has carried out a detailed site assessment to identify all deliverable or developable options	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure

• Requests that the housing target reflect the alternative scenario and exclude Owlsbury Farm.	• The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	growth needs are being met as far as possible.
Mayfield and Five Ashes Parish Council • Concern raised that the draft Plan does not meet the housing requirement generated by the revised Standard Method • Concern that failure to demonstrate delivery of the housing requirement could result in the Plan being found unsound or rejected. • Policy SS2 is overly focused on explaining why the housing requirement cannot be met rather than identifying solutions to address the shortfall • Request for a more positive and proactive approach, including revisiting site options and encouraging delivery on existing permitted sites • Concern regarding reliance on a windfall allowance of 51 dwellings in Mayfield and Five Ashes despite no housing allocations being proposed in the parish	• Concerns noted • Since publication of the draft Plan, the Council has undertaken a further Call for Sites exercise and has progressed additional site assessment work on new and existing site submissions, and Option sites, through the Strategic Housing and Economic Land Availability Assessment (SHELAA), Sustainability Appraisal and supporting evidence studies. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfall allowance and subsequent allocations to ensure growth needs are being met as far as possible.
Heathfield and Waldron Parish Council	• Objection noted	SHELAA sites reviewed as well as updates to other evidence studies

• Objects to the housing shortfall and considers it unlikely to be accepted at examination. • Also objects to proposed Heathfield option sites HEA10, HEA11 and HEA12.	• Since publication of the draft Plan, the Council has undertaken a further Call for Sites exercise and has progressed additional site assessment work on new and existing site submissions, and Option sites, through the Strategic Housing and Economic Land Availability Assessment (SHELAA), Sustainability Appraisal and supporting evidence studies. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Withyham Parish Council • Supports affordable housing where it meets genuine local need. • If additional housing is required within the parish, supports small rural exception sites, schemes prioritising homes for local residents, and development that integrates with existing village form. • Considers large housing developments inappropriate within the parish context.	• Support welcomed. • The plan should be read as a whole. Any development must also comply with other policies in the plan, such as Policy HO7 rural exception sites and Policy HO8 affordable housing.	No change required
Warbleton Parish Council • Supports Policy SS2 in principle but does not agree with the list of potential sites.	• Support welcomed. • The Council has carried out detailed site assessments to identify all deliverable or developable options	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure

• States that housing provision should instead be met through a new town approach.	• The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	growth needs are being met as far as possible.
Arlington Parish Council • Objects to OAL1/OARL1, stating that the site lies within rural Arlington Parish and should not be described as Hailsham. • Raises concerns about car dependency, crossing the A22, flooding, downstream impacts on Arlington and Alfriston, flood insurance, and the need for genuinely affordable housing rather than dormitory commuter development.	• Objection noted • Since publication of the draft Plan, the Council has undertaken a further Call for Sites exercise and has progressed additional site assessment work on new and existing site submissions, and Option sites, through the Strategic Housing and Economic Land Availability Assessment (SHELAA), Sustainability Appraisal and supporting evidence studies. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	Further policy refinements made in respect of the consideration of sustainability of sites.
Pevensey Parish Council • Objects to WES7 Peelings Lane and the Mint House site.	• Objection noted • Since publication of the draft Plan, the Council has undertaken a further Call for Sites exercise and has progressed	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as

• Issues raised include highway safety, congestion in Westham and Pevensey, loss of farmland and rural amenity, impacts on Pevensey Levels designations, flooding and drainage, biodiversity loss, pressure on local services and concerns about overdevelopment and site suitability.	additional site assessment work on new and existing site submissions, and Option sites, through the Strategic Housing and Economic Land Availability Assessment (SHELAA), Sustainability Appraisal and supporting evidence studies. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	possible. This includes further consideration of the Peeling Lane site. Mint House has been removed from the Plan.
Berwick Parish Council • Comments that development of OAL1/OARL1 is likely to exacerbate flooding issues along the Cuckmere River into Alfriston.	• Objection noted • Since publication of the draft Plan, the Council has undertaken a further Call for Sites exercise and has progressed additional site assessment work on new and existing site submissions, and Option sites, through the Strategic Housing and Economic Land Availability Assessment (SHELAA), Sustainability Appraisal and supporting evidence studies, including the Strategic Flood Risk Assessment (SFRA). • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken	Policies in the plan properly consider flooding issues as well as provisions in national planning policy.

Willingdon and Jevington Parish Council • Objects to further dwellings in Willingdon and Jevington. • Raises concerns about development on remaining greenfield land, congestion on the A2270, loss of parking in Polegate town centre, lack of confidence in infrastructure delivery, impacts on the 1066 walk and possible Roman road, and pressure on water supply and foul drainage.	• Objection noted • Since publication of the draft Plan, the Council has undertaken a further Call for Sites exercise and has progressed additional site assessment work on new and existing site submissions, and Option sites, through the Strategic Housing and Economic Land Availability Assessment (SHELAA), Sustainability Appraisal and supporting evidence studies, including the Strategic Flood Risk Assessment (SFRA). • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible. Other policies in the plan consider sustainable communities and infrastructure considerations.
Rotherfield Parish Council • Supports Policy SS2 and agrees with the list of potential sites and amount of development.	Support noted.	No change required.
Little Horsted Parish Meeting • Objects to Policy SS2 where it relies on the Owlsbury Farm allocation and supports the alternative scenario excluding Owlsbury Farm.	• Objection noted • Since publication of the draft Plan, the Council has undertaken a further Call for Sites exercise and has progressed	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure

• Requests policy changes relating to Uckfield development boundary, parish settlement gaps and the Ashdown Forest 7km zone of influence, including robust HRA, air quality and cumulative impact evidence before allocations or permissions are progressed.	additional site assessment work on new and existing site submissions, and Option sites, through the Strategic Housing and Economic Land Availability Assessment (SHELAA), Sustainability Appraisal and supporting evidence studies. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessments undertaken. • An update Habitat Regulation Assessment has been published alongside the proposed submission Local Plan.	growth needs are being met as far as possible. HRA has also been updated.
Wadhurst Parish Council • Object to Policy SS2 as drafted. • Concern that the draft Plan falls significantly short of the revised housing requirement • Concern that failure to meet the housing requirement may result in the Local Plan being found unsound or rejected • Suggest that additional sites and development options should be reconsidered to address the housing shortfall • Concern regarding reliance on windfall housing delivery	• Objection and concerns noted. • Since publication of the draft Plan, the Council has undertaken a further Call for Sites exercise and has progressed additional site assessment work on new and existing site submissions, and Option sites, through the Strategic Housing and Economic Land Availability Assessment (SHELAA), Sustainability Appraisal and supporting evidence studies. • The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfal considerations and subsequent allocations to ensure growth needs are being met as far as possible.

	Appraisal, including the site-specific assessments undertaken	
Horam Parish Council • Objects to the scale of growth proposed for Horam under Policy SS2, considers HOR6 and HOR1 unsuitable in their current form, seeks a lower growth alternative for Horam, raises concerns regarding landscape, biodiversity and sustainability impacts, and questions the robustness of the settlement hierarchy and Sustainability Appraisal evidence.	• Objections and comments noted. • The spatial strategy set out in Policy SS2 has been informed by a range of evidence, including the settlement hierarchy, sustainability considerations, site assessment work, infrastructure capacity and the need to meet the district's identified housing and employment requirements • Horam is one of the larger and more sustainable settlements within the Tier 3 category and the proposed level of growth reflects its role within the settlement hierarchy and the availability of suitable development opportunities capable of contributing to the overall development needs of the district • HOR6 has been assessed through the site selection process having regard to a range of planning considerations, including landscape, ecology, accessibility, infrastructure requirements and the ability to deliver a comprehensive and sustainable development. Development within the site, including the location of built development, green infrastructure and community facilities, would be further refined through masterplanning and	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible. Further landscape work also undertaken as well as an updated SA/SEA supporting the Plan.

	subsequent planning application processes. • HOR1 has been assessed through the site selection process. The allocation includes requirements for appropriate landscaping, biodiversity enhancement and the provision of open space to mitigate development impacts. Any future planning application would also be required to demonstrate compliance with relevant policies • The SSS has been reviewed and updated and this has not materially altered Horam's position as a Tier 3 settlement. • Landscape effects have been assessed through the Council's evidence base, including landscape sensitivity and site assessment work. WDC are satisfied that the proposed allocations are capable of being developed without resulting in unacceptable landscape harm. • The Council is satisfied that the Sustainability Appraisal provides a proportionate and robust assessment to inform plan preparation. • Having regard to the evidence base as a whole, the Council considers that the proposed distribution of growth, including allocations at Horam, represents an appropriate and justified	

	strategy for meeting development needs across the plan period.	
Chalvington with Ripe Parish Council • Object to the proposed scale and location of growth at Berwick Station (BE1 – BE4). • Challenges the application of the settlement hierarchy to Berwick. • Argue that growth is disproportionate to the settlement's role and function. • Argue that alternative, more sustainable locations should have been considered. • Raises concerns about sustainability, infrastructure capacity, landscape and environmental impacts. • Concludes that the allocations (BE1 – BE4) should be removed from the Plan.	• Objections noted • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan. • The evidence base, including landscape sensitivity, and proposed site allocation policies identify key constraints for the sites which are addressed via site-specific policy requirements and/or within other policies within the Plan.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Frant Parish Council • Object to spatial strategy and scale of growth proposed in Frant Parish.	• The evidence base and proposed site allocation policies identify key constraints for the sites which are addressed via site-specific policy	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible. Further work has been

• Argues the "South of Tunbridge Wells" growth strategy is inappropriate, placing pressure on infrastructure and services in Tunbridge Wells rather than within Wealden • Argue the Council has not adequately justified exceptional circumstances for major development in the National Landscape • Contend that the site assessment methodology is flawed and inconsistent, particularly in its treatment of landscape impacts. • Argues that reasonable alternatives outside the National Landscape have not been sufficiently explored • Raises concerns regarding the cumulative impacts on water supply, highways, rural character, heritage, biodiversity and flood risk.	requirements and/or within other policies within the Plan. • The determination of whether development constitutes major development in a National Landscape is a matter of planning judgment, taking account of the proposal in question and its context. The allocation of a site within a Local Plan does not in itself determine whether any future planning application would constitute major development for the purposes of national policy • Cumulative impact of the Plan is assessed as part of the accompanying Sustainability Appraisal (SA). • Cumulative impact of the Frant sites is assessed in the landscape evidence base and SA.	undertaken on landscape and infrastructure, including policy wording changes.
Isfield Parish Council • Objects to Policy SS2 as it is based on Scenario 1, which includes the Owlsbury Farm allocation – argue this site should be removed. • Argues that growth requirements should be reassessed following further site assessment work before determining the final spatial strategy.	• Objection noted. • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

	Appraisal, including the site-specific assessment undertaken.	
Laughton Parish Council • Supports recognition of development constraints and the need to address the district's housing requirements but identifies inconsistencies between the SHELAA and Sustainability Appraisal site assessments. • Raises concerns that the spatial strategy places excessive growth along the A22 corridor, where the road network is already under significant pressure, and lacks a clear transport strategy to address cumulative impacts. • Suggests a more dispersed pattern of growth, including greater development in settlements such as Mayfield, Forest Row and Hartfield, to help meet local housing needs, support affordable housing provision, enable downsizing opportunities and sustain local services and schools.	• Comments and concerns noted. • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing and economic development need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Batcheller Monkhouse • Argues that Policy SS2 significantly under-provides housing • Questions whether the housing requirement should be higher still if a 20% Housing Delivery Test buffer is applied • Notes that the Plan does not currently account for any unmet housing need from neighbouring	• Objection noted • Sites assessments have been reviewed as part of the work for the Regulation 19 Local Plan. • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

authorities, which may further increase requirements. • Contends that the constraints relied upon to justify reduced housing numbers are insufficiently evidenced, and that additional sites should be identified to enable the Plan to meet housing needs more fully.		
Elvia Homes • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence • Argues that SS2 is based on a capacity-led approach rather than a needs-led strategy • Calls for the Council to review SS2 and identify additional strategic housing opportunities to meet the full minimum housing requirement. • Strongly supports further consideration of Laughton Park Farm (Oakleigh Garden Community)	• Objection noted. • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible. .
Gladman Development Ltd • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence	• Objection noted • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district,	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Argue that greater housing delivery is needed and that the Council should take a more proactive approach to reducing the identified shortfall • Highlights the negative consequences of under-provision, including worsening housing affordability, reduced affordable housing delivery, and a slower replacement of older, less energy-efficient housing stock. • The representation promotes additional housing land at Bexhill Road, Ninfield, requesting reassessment of the site's capacity and suitability as part of the Council's ongoing work to increase housing supply	including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	
Harvey & Son (Lewes) Ltd • Seeks greater clarity on Policy SS2's housing requirement, noting inconsistencies in the plan's stated housing figures and requesting clear justification where housing provision falls below the standard method need • Supports a higher overall housing target and argues that the plan should maximise housing delivery rather than accept a reduced level of provision • Advocates a broader distribution of housing sites, suggesting that reliance on a further large strategic allocation is unnecessary if smaller and more medium-sized sites in sustainable locations are included	• Comments noted. • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Promotes Magham Down as a sustainable location for growth, highlighting its accessibility to Hailsham and public transport links,	bases and Sustainability Appraisal to maximise housing delivery.	
Greymoor Homes / Carter Jonas • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence • Argues that SS2 fails to adequately address housing affordability and affordable housing needs • Supports increasing housing provision through additional allocations, including sites such as Beechenwood Farm, and endorses spatial strategy options that would meet 90-100% of housing need to create a more resilient housing supply and reduce the identified shortfall.	• Objection noted. • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Esquire Developments • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence • Supports the Council's efforts to identify further housing sites and test additional growth scenarios, but considers that even with all	• Objection noted. • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

current option sites included, the Plan would still fail to meet housing needs • Challenges the reliance on a 2,000-dwelling windfall allowance, arguing that the evidence does not demonstrate that historic windfall delivery rates will continue • Seeks amendments to Policy SS2 to allow housing development adjacent to defined development boundaries in sustainable locations.	these constraints significantly limit the extent to which housing needs can be met in full. • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	
Tor & Co / Hallam Land • Objects to the proposed housing target, noting that the Plan seeks to deliver 977 dpa, significantly below the standard method requirement of 1,457 dpa, and makes no allowance for unmet needs from neighbouring authorities • Questions the justification for the housing shortfall, • Highlights uncertainty regarding transport constraints, stating that further evidence is required before it can be concluded whether highway impacts justify limiting growth • Supports the identification of additional development sites, arguing that further allocations are needed to increase housing delivery and help meet identified housing needs.	• Objection noted • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council recognises that transport evidence continues to evolve and has been prepared alongside the Local Plan to inform decisions on the scale and distribution of growth. The Plan seeks to balance the need for housing delivery with the need to avoid unacceptable impacts on the transport network and other infrastructure	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible. Further work has been undertaken in respect of transport to support the Regulation 19 Plan.

	• The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	
Taylor Wimpey • Objects to Policy SS2 on the basis that the proposed spatial strategy fails to meet housing needs • Contends that the Plan should be extended to 2043 to ensure it covers a full 15-year period • Raises concerns about wider unmet housing needs across neighbouring authorities • Calls for existing allocations to be retained and additional sites identified	• Objection noted • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council has reviewed additional site opportunities and site capacities, including all Option sites and previously rejected sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible. .
Home Builders Federation • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence.	• Objection noted • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure

• Questions the Council's justification for reducing housing numbers, noting that transport evidence is still being developed and that highway constraints have not yet been demonstrated. • Highlights that the Sustainability Appraisal supports higher growth options, suggesting there is scope to deliver substantially more housing than proposed in SS2. • Calls for the Council to identify additional housing sites and meet housing needs in full, including consideration of unmet needs from neighbouring authorities, affordable housing needs, and the wider housing affordability crisis.	policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council recognises that transport evidence continues to evolve and has been prepared alongside the Local Plan to inform decisions on the scale and distribution of growth. The Plan seeks to balance the need for housing delivery with the need to avoid unacceptable impacts on the transport network and other infrastructure • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	growth needs are being met as far as possible. Further work has been undertaken in respect of transport to support the Regulation 19 Plan.
Marrons • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence. • Argues that the housing requirement should also consider unmet needs from neighbouring authorities and significant affordable housing needs within Wealden.	• Objection noted • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Accepts that landscape, biodiversity and flood risk constraints exist, but contends that additional growth opportunities in less constrained locations have not been fully explored • Calls on the Council to maximise housing delivery and investigate all reasonable opportunities and sites to ensure minimum housing needs are met as fully as possible.	these constraints significantly limit the extent to which housing needs can be met in full. • The Council recognises that transport evidence continues to evolve and has been prepared alongside the Local Plan to inform decisions on the scale and distribution of growth. The Plan seeks to balance the need for housing delivery with the need to avoid unacceptable impacts on the transport network and other infrastructure • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	
Genesis Town Planning • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence. • Contends that the Council should seek to meet housing needs in full, and contribute towards unmet needs from neighbouring authorities • Argues that development opportunities within constrained areas, including settlements in the High Weald National Landscape, should not be discounted where sustainable development and mitigation can be achieved	• Objection noted • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council recognises that transport evidence continues to evolve and has	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Highlights the acute housing affordability and affordable housing need in Wealden and East Sussex, arguing that additional housing sites should be allocated and the housing target increased to help address these issues.	been prepared alongside the Local Plan to inform decisions on the scale and distribution of growth. The Plan seeks to balance the need for housing delivery with the need to avoid unacceptable impacts on the transport network and other infrastructure • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	
Lewis & Co / Ninfield Investrments Ltd • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence. • Argues that landscape, biodiversity and flood risk constraints do not preclude residential development on land south of Catsfield Road, Ninfield. • Argue the housing delivery strategy underpinning SS2 should be reviewed, with additional housing allocations identified to help address the shortfall and better align with NPPF requirements.	• Objection noted • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Lewis and Co Planning / TNC Group Holdings	• Objection and comment noted.	SHELAA sites reviewed as well as updates to other evidence studies

• Argues Policy SS2 should make greater provision for specialist housing, as the Council's Local Housing Needs Assessment (January 2026) identifies a significant increase in the number and proportion of residents aged 65 and over during the Plan period • The ageing population is expected to generate increased demand for Use Class C2 accommodation, including care homes and housing with care • Despite this identified need, the Local Plan contains limited provision for Use Class C2 development, and additional site allocations should be considered to better meet future requirements.	• The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council recognises and is supportive of development proposals looking to provide housing units with support, housing units with care and care home bedspaces and this is addressed in Policy HO11.	including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Lewis & Co / Arlington Stadium • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence • Promotes Arlington Stadium, Arlington Road West, Hailsham (SHELAA Site 044/1310) as a suitable site to help address the housing shortfall • Requests that Arlington Stadium be allocated in the next iteration of the Local Plan.	• Objection noted • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

	• The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	
Landstrom Group Ltd • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence • Contends that the site assessment process has been overly restrictive • Objects to the proposed Ninfield Policies Map and Development Boundary, noting that it has not been updated since January 2024 and does not reflect the increased housing requirement identified through the latest evidence. • Supports the principle of Policy SS2 Part 2, subject to amendments to the Ninfield Development Boundary to include existing properties on Bexhill Road and Crouch Lane and incorporate Site 972/3170 as a housing allocation to help meet local housing needs	• Objection noted • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Stantec UK Ltd • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence.	• Objection noted • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Supports the inclusion of North West Hailsham (Option OARL1) and requests its allocation at Regulation 19	landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	
Fernham Homes Operations Ltd and Catesby Strategic Land Ltd • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence. • Raises concerns regarding the evidence supporting housing supply and delivery, including the absence of a housing trajectory, lack of detailed deliverability evidence for allocations, reliance on a 2,000-dwelling windfall allowance, and the Council's current five-year housing land supply deficit. • Contends that additional housing sites should be allocated to address these shortcomings	• Objection noted • The Council has reviewed additional site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
The Montacute Estate &Knight Frank • Supports the overall intent of Policy SS2 to direct housing growth to sustainable locations	• Objection noted • The Council has reviewed site opportunities and site capacities through the Call for sites, evidence	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure

but argues the policy does not go far enough to meet identified housing needs. • Advocates the allocation of additional housing sites in highly sustainable locations, particularly in the south and south-west Tunbridge Wells area • Raises concerns about the deliverability and robustness of the housing strategy, citing the absence of a housing trajectory, reliance on unresolved technical evidence for many sites, and a potentially unrealistic windfall allowance of 2,000 homes	bases and Sustainability Appraisal to maximise housing delivery.	growth needs are being met as far as possible.
Firle Estate • Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence. • Argues that even with all identified 'option' sites coming forward the Plan would still fall short indicating a need for further site allocations and increased housing supply • If the proposed strategic site at Uckfield is not allocated the shortfall will increase further. • SS2 should not only seek to meet Wealden's own housing needs but also consider unmet needs from neighbouring authorities, particularly Eastbourne	• Objection noted • The Council has reviewed site opportunities and site capacities through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Wates Developments	• Objection noted • The Council has reviewed site opportunities and site capacities	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and

• Objects to the proposed housing requirement of 16,609 dwellings, arguing it falls significantly short of the identified housing need and is not justified by the evidence. • The housing target is reliant on the inclusion of the Owlsbury Farm, Uckfield strategic allocation – if this is not pursued the shortfall could increase further • Argues that even with all identified 'option' sites coming forward the Plan would still fall short indicating a need for further site allocations and increased housing supply • SS2 should also take greater account of unmet housing needs from neighbouring authorities, particularly Eastbourne, Rother and Lewes.	through the Call for sites, evidence bases and Sustainability Appraisal to maximise housing delivery.	subsequent allocations to ensure growth needs are being met as far as possible.
Fairfax Acquisitions Limited • Supports the updated spatial strategy insofar as it includes Owlsbury Farm as an allocation. • Considers that Owlsbury Farm would make a significant contribution to the District's housing needs and should be carried forward as a site allocation.	• Support welcomed. • All Option sites have been reviewed and assessed for potential allocation.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible. Owlsbury included within the plan as an allocation.
Newlyn Investments Limited • Supports the Council's effort to increase housing provision, but notes that Policy SS2 still fails to meet the District's identified housing need	• Comments noted. • The Council has reviewed additional site opportunities and site capacities through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery. • The Council will continue to engage with neighbouring authorities through	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Considers that the plan should retain flexibility by including additional deliverable sites capable of early and medium-term delivery • Argues that Framfield is a sustainable location for further growth and questions why no allocations have been made there, particularly when other Tier 4 settlements have received housing allocations • Promotes land at Framfield as a sustainable, moderate-sized opportunity that could support housing delivery and provide resilience against reliance on larger or more complex allocations…	the Duty to Cooperate and ongoing strategic cross-boundary discussions regarding housing needs and housing market area relationships	
B.Yond Homes Limited • Broadly agrees with the need for housing but raises concerns about the scale of Owlsbury Farm and its cumulative impact with other proposals and commitments at Uckfield. • Suggests a reduced scale at Owlsbury and a more proportionate distribution across smaller sites and villages.	• Support noted • The Council has reviewed additional site opportunities and site capacities through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment and this includes the site at Owlsbury Farm.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible. Owlsbury included within the plan as an allocation.
The Nevill Estate Company & Stratton Estates • Objects to Policy SS2 on the basis that the proposed spatial strategy fails to meet housing needs • Argues that growth is overly concentrated in the south of the district, particularly within the Low Weald, and that this does not adequately reflect housing demand, affordability pressures	• Objections noted. • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected landscapes, infrastructure capacity and deliverability considerations. The	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

and access to employment opportunities in the north of Wealden • Supports a more dispersed housing strategy, including greater growth within Type 3 and Type 4 settlements and smaller rural villages • Requests that the Council identify additional sustainable housing opportunities in northern Wealden, including settlements such as Eridge and Frant, and reintroduce policy support for carefully designed development adjoining existing villages to deliver proportionate growth within the High Weald.	Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The distribution of growth has been informed by the settlement hierarchy, sustainability considerations, infrastructure capacity and environmental constraints, including the High Weald National Landscape. • The Council considers that directing a significant proportion of growth to the most sustainable settlements remains an appropriate strategy. However, opportunities for proportionate growth within lower-tier settlements have also been considered through the site selection process. • The Council has reviewed additional site opportunities and site capacities through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment.	
Cochrane Strategic Development Limited • Objects to the housing target as significantly below the standard method requirement • Challenges the Council's justification for not meeting housing need, contending that constraints are overstated and that additional	• Objection noted. • The housing target set out in the Local Plan has been informed by a comprehensive assessment of environmental, infrastructure and policy constraints affecting the district, including nationally protected	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible. However, this site is

deliverable sites, particularly North West Hailsham (OARL1), could contribute significant housing growth without unacceptable landscape, flood risk, ecology or highway impacts • Argues that SS2 fails to address unmet housing needs from neighbouring authorities and historic under-delivery • Seeks a revised growth strategy with additional strategic-scale allocations, including up to 2,500 homes at North West Hailsham, and requests extension of Hailsham's development boundary to support sustainable growth and associated infrastructure delivery.	landscapes, infrastructure capacity and deliverability considerations. The Council's evidence concludes that these constraints significantly limit the extent to which housing needs can be met in full. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment.	considered suitable for inclusion within the Plan.
High Cross Investments (2023) Ltd • Supports the principle of Policy SS2 but highlights the housing figure still falls short of the identified need – only providing around 67% of identified need. • Acknowledges Wealden's environmental and landscape constraints, but argues that other authorities facing comparable or greater constraints have adopted plans that more closely meet their housing requirements • Urges the Council to maximise housing delivery through additional sustainable and deliverable allocations, including strategic urban extensions around Uckfield and other principal settlements	• Support welcomed. • The proposed housing target has been reviewed and reflects the level of housing that can currently be identified through the evidence base, taking account of significant environmental, landscape, infrastructure and other planning constraints affecting the district. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

DJA Planning • State that the list of sites in Table 6 required further assessment prior to Reg 19 Plan • There is also scope for the reassessment of some smaller sites, currently not considered to be deliverable/sustainable, to be re-assessed as their suitability may change in the event some of the strategic allocations come forward as formal allocations eg land to the west of the A22 and Halland/East Hoathly new villages.	• Comments noted. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.
Troy Planning • Objects to the approach underpinning Policy SS2 and the consultation process, arguing that the Plan does not adequately assess or consult on reasonable alternative spatial distribution strategies for housing growth across the district. • Questions the evidence base supporting additional housing option sites, particularly around Hailsham, contending that sites previously assessed as unsuitable are now being promoted primarily to increase housing supply without sufficient justification or consideration of wider sustainability objectives. • Raises concerns about the sustainability and infrastructure impacts of major growth around Hailsham, including pressure on highways, town centre congestion, wastewater infrastructure, access to services and facilities	• Objections noted. • Reasonable alternative spatial strategy options are assessed and presented within the Sustainability Appraisal. • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy and subsequent allocations to ensure growth needs are being met as far as possible.

• Objects to specific option sites, including Land North West of Hempstead Lane (OARL1) and Saltmarsh Lane (OHA5).	Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment.	
Bellway Homes • Objects to the housing target as significantly below the standard method requirement • Argues that Wealden should seek to meet its full housing need and account for wider unmet needs • Questions the robustness of the housing supply figures underpinning SS2, particularly the reliance on 7,845 committed dwellings and assumptions regarding delivery rates • Challenges the reliance on a 2,000-dwelling windfall allowance.	• Objections noted. • The proposed housing target has been reviewed and reflects the level of housing that can currently be identified through the evidence base, taking account of significant environmental, landscape, infrastructure and other planning constraints affecting the district. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfall allowances and subsequent allocations to ensure growth needs are being met as far as possible.
Wilbury Planning • Supports the overall approach of Policy SS2 and the focus on directing growth to the District's most sustainable settlements • Acknowledges that the proposed housing target remains below the identified housing need	• Support welcomed • Buffer comments noted.	No changes required.

• Supports the allocation of Bolneys Farm (HA6) in Hailsham • Raises concerns that the proposed 25-metre ancient woodland buffer under Policy NE4 may unnecessarily constrain housing delivery.		
Persimmon Homes • Objects to the housing target as significantly below the standard method requirement • Advocates a more ambitious housing requirement, including a 10% buffer • Questions the robustness of the housing supply underpinning SS2, raising concerns about the deliverability of commitments, the absence of a clear housing trajectory and five-year housing land supply strategy, and the reliance on a substantial windfall allowance that is considered insufficiently evidenced • Calls for further review of site capacity and additional housing opportunities, including reassessment of rejected SHELAA sites and potential allocations	• Objection noted • The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The Council has reviewed additional site opportunities and site capacities, including all Option sites and previously rejected sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfall allowances and subsequent allocations to ensure growth needs are being met as far as possible.
Martin Grant Land • Objects to the housing target as significantly below the standard method requirement	• Objection noted • The Council has carried out a detailed site assessment to identify all deliverable or developable options	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfall allowances and subsequent

• Supports the Council's continued efforts to identify and assess additional housing sites, including proposed allocations and development options, • Highlights the need to consider unmet housing needs from neighbouring authorities, particularly Eastbourne and Tunbridge Wells, • Raises concerns regarding the robustness of the proposed 2,000-dwelling windfall allowance	• The Council carried out significant assessment work to identify land to address its housing need, including the need for extension to sustainable settlements. The process is set out in full in accompanying evidence base documents, such as the Spatial Strategy topic paper and Sustainability Appraisal, including the site-specific assessment undertaken. • The Council has reviewed additional site opportunities and site capacities, including all Option sites and previously rejected sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment.	allocations to ensure growth needs are being met as far as possible.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Inspired Villages Group • Objects to Policy SS2 for not including a specific target or strategy for specialist older persons housing • Calls for the Council to adopt an ambitious approach to planning for older persons housing, including specialist accommodation such as extra care housing and Integrated Retirement Communities (IRCs) • Encourages the allocation of suitable sites and stronger policy support for specialist older persons housing	• Objection noted • The Council recognises and is supportive of development proposals looking to provide housing units with support, housing units with care and care home bedspaces and this is addressed in Policy HO11.	No changes required.

Sussex Wildlife Trust • Concerned about cumulative impacts on the natural environment. Given that the standard method for calculating housing need does not consider an area's environmental limits in the calculation, SWT ask whether WDC is confident that the environmental evidence base supporting the local plan is sufficient to ensure the proposed level of development can be delivered sustainably.	• Concerns noted. • The proposed housing target has been reviewed and reflects the level of housing that can currently be identified through the evidence base, taking account of significant environmental, landscape, infrastructure and other planning constraints affecting the district. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment	Further work has been undertaken to consider impacts on the natural environment, including through an updated sustainability appraisal.
Trustees of the Withyam Settlement c/o CLM Ltd • No specific comments on SS2 but consider that some of the existing allocations could also be amended to provide a higher yield of development from the selected sites. • HAR1 has recently been the subject of a planning application WD/2025/2304/PIP which has confirmed it can accommodate 5 homes • HAR2 has the potential to accommodate more than 6 homes while respecting the specific landscape and heritage designations of the site and wider area. The site capacity could be extended to 'around 10 homes'	• The Council has carried out a detailed site assessment to identify all deliverable or developable options • The Council has reviewed additional site opportunities and site capacities, including all Option sites and previously rejected sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment.	No changes required

Rotherfield Protection Group • Supports the lower housing target where justified by landscape, biodiversity and flood risk constraints, particularly protection of the High Weald National Landscape. • Objects to the indicative yield for ORO2 at Highfields Farm, Rotherfield, due to landscape prominence and other site constraints.	• Support welcomed. • The proposed housing target has been reviewed and reflects the level of housing that can currently be identified through the evidence base, taking account of significant environmental, landscape, infrastructure and other planning constraints affecting the district. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment.	Site ORO2 has become a site allocation. The overall evidence base has considered sensitivity and the opportunity for development on the appropriate parts of sites.
High Weald National Landscape • Object to the scale and distribution of housing proposed under Policy SS2 within the High Weald National Landscape • Contend that several proposed allocations within the HWNL would harm landscape character and scenic beauty and should be removed, with a corresponding reduction in the housing requirement • Argue that Wealden is justified in planning for less than its full Local Housing Need due to significant environmental constraints, particularly the High Weald National Landscape	• Objection noted • The Council recognises the importance of conserving and enhancing the High Weald National Landscape and has taken this into account throughout the preparation of the Local Plan, including the development of the spatial strategy, site selection process and sustainability appraisal. • The proposed housing strategy seeks to balance the need to maximise housing delivery with the significant environmental constraints affecting the District. All proposed allocations within	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfall allowances and subsequent allocations to ensure growth needs are being met as far as possible. Further landscape work has been undertaken to support inclusion of sites, where appropriate.

• Raise concerns that several allocations in Frant Parish may constitute major development within the HWNL and therefore should only be considered in exceptional circumstances and where in the public interest, concluding that their inclusion could render the Plan unsound and that a landscape-led approach focused on smaller-scale development would be more appropriate.	the High Weald National Landscape have been subject to assessment against relevant planning and landscape considerations • The proposed housing provision has been informed by an assessment of land availability, deliverability and environmental constraints, including those arising from the High Weald National Landscape. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment.	
The Woodland Trust • Objects to allocations and option sites under Policy SS2 where ancient woodland, veteran trees or adjacent woodland habitats may be affected • Requests that site boundaries and allocations be reviewed to exclude ancient woodland from development areas, with appropriate buffers provided around ancient woodland and veteran trees in line with Policy NE4 and best practice guidance. • Advocates a precautionary minimum 50-metre buffer between development and ancient	• Objections and comments noted • Site boundaries should be distinguished from site developable areas where development should be directed to. Other policies in the plan control the impacts of proposed development on areas such as Ancient Woodland (Policy NE4). The plan should be read as a whole and proposals will be required to comply with all relevant policies in the plan.	No changes proposed.

woodland, unless clear evidence demonstrates that a smaller buffer would avoid adverse effects • Raises specific concerns regarding a number of proposed allocations and option sites (including OARL1, OBU1, OCR1, OCR2, OEH1, OFF1-3, OFF5, OFF8 and OFR1) where development could affect ancient woodland, woodland connectivity, or veteran trees.		
Conservators of Ashdown Forest • Objects to the level of development within the Ashdown Forest zone of influence, citing insufficient planned SANG capacity at Walshes Park and Owlsbury Park and the absence of an up-to-date Habitats Regulations Assessment. • Considers the current draft unsound without adequate SANG and HRA evidence.	• Objection noted. • An update Habitat Regulation Assessment has been published alongside the submission version of the Local Plan	Further work has been undertaken in respect of SANGs and HRA.
Dicker Residents Association • Objects to large-scale housing growth associated with Policy SS2, particularly at Land North West of Hempstead Lane, Hailsham (OARL1), citing significant flood risk concerns, including river, groundwater, sewer and climate change-related flooding identified in the Strategic Flood Risk Assessment. • Argues that development would exacerbate downstream flooding and drainage issues, with concerns that land raising, limited SuDS opportunities and increased runoff could adversely affect nearby communities,	• Objections noted. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfall allowances and subsequent allocations to ensure growth needs are being met as far as possible.

environmental assets and historic sites within the Cuckmere catchment. • Raises concerns regarding environmental and landscape impacts, including harm to the natural floodplain, wetland habitats, biodiversity, views from the South Downs National Park and the rural character of the area		
Community Campaigner David Barton • Provides a neutral response, indicating that support would depend on the integration of authentic traditional architecture design codes to benefit key stakeholders and existing and new communities.	• Comments noted. • Matters relating to design quality, local character and design coding are considered through relevant design policies within the Plan	No change required.
On the Go, Polegate High Street Shop • Objects to the housing target as significantly below the standard method requirement • Supports the inclusion of additional sites for consideration, together with strong infrastructure, service provision and CIL safeguards, to reduce the risk of speculative development and potential Government intervention if an up-to-date Local Plan is not adopted. • Objects to the proposed distribution of growth, arguing that a disproportionately large amount of housing is directed towards Hailsham, Polegate, Willingdon, Hellingly, Westham and	• Objections noted. • The proposed housing target has been reviewed and reflects the level of housing that can currently be identified through the evidence base, taking account of significant environmental, landscape, infrastructure and other planning constraints affecting the district. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfall allowances and subsequent allocations to ensure growth needs are being met as far as possible.

surrounding settlements, risking coalescence and the loss of green gaps between communities and Eastbourne. • Considers the housing distribution across the District to be unbalanced, highlighting that Crowborough receives a comparatively low level of housing growth despite its status as a Type 1 settlement, while some smaller settlements are proposed to accommodate higher levels of development.	district's landscape and natural environment. • The distribution of growth has been informed by the settlement hierarchy, sustainability considerations, infrastructure capacity and environmental constraints, including the High Weald National Landscape. • The Council considers that directing a significant proportion of growth to the most sustainable settlements remains an appropriate strategy. However, opportunities for proportionate growth within lower-tier settlements have also been considered through the site selection process.	
Village Concerns • Objects to the scale and distribution of growth proposed under Policy SS2, particularly the allocation of a further 650 homes in East Hoathly and the identification of a possible 4,441-home new settlement west of Halland • Raises significant infrastructure concerns, arguing that existing and planned development would worsen congestion on the A22 corridor, increase car dependency, and place unacceptable pressure on roads, public transport, education provision and community facilities • Highlights environmental constraints and impacts, including potential harm to the Park	• Objections noted. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment. • The distribution of growth has been informed by the settlement hierarchy, sustainability considerations, infrastructure capacity and environmental constraints, including the High Weald National Landscape.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfall allowances and subsequent allocations to ensure growth needs are being met as far as possible. IDP updated.

Corner Heath SSSI, flood risk, sewage discharges, wastewater treatment capacity, landscape character and biodiversity arising from further housing growth. • Requests a reassessment of housing allocations, infrastructure requirements and the suitability of the proposed Halland growth option.	• The Council considers that directing a significant proportion of growth to the most sustainable settlements remains an appropriate strategy. However, opportunities for proportionate growth within lower-tier settlements have also been considered through the site selection process. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan	
Community Project Ltd • Supports the Council's recognition of housing delivery constraints and the need to address the identified shortfall of 8,160 dwellings, but requests greater transparency where evidence base documents reach differing conclusions on potential development sites, including resolution of discrepancies between the SHELAA and Sustainability Appraisal. • Raises concerns about the concentration of housing growth along the A22 and A27 corridors, arguing that these routes already experience capacity issues and that the Plan should provide a clearer strategy for transport infrastructure improvements and mitigation • Notes that the Sustainability Appraisal identifies the need for further transport studies and mitigation measures, but considers the Plan should set out a stronger and more explicit	• Objection noted. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan. • The Council has reviewed additional site opportunities and site capacities, including all Option sites, through the Call for sites; evidence bases and Sustainability Appraisal to maximise housing delivery whilst protecting the district's landscape and natural environment. • The distribution of growth has been informed by the settlement hierarchy, sustainability considerations, infrastructure capacity and environmental constraints, including the High Weald National Landscape.	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfall allowances and subsequent allocations to ensure growth needs are being met as far as possible. IDP updated.

vision for addressing transport impacts arising from growth • Questions the limited level of development proposed in some larger villages with established services, such as Mayfield, Forest Row and Hartfield, suggesting that modest additional housing could help meet local needs, support affordability, facilitate downsizing and maintain local services such as schools. • Objects to the inclusion of Option Site OEH1 (Land at Laughton Park Farm) – would conflict with SS1, be disproportionate to nearby settlements, and should not progress without a comprehensive assessment of alternative growth options	• The Council considers that directing a significant proportion of growth to the most sustainable settlements remains an appropriate strategy. However, opportunities for proportionate growth within lower-tier settlements have also been considered through the site selection process. • Infrastructure required to meet growth is set out in policy within the Local Plan and supporting Infrastructure Delivery Plan	
RC • Objects that Policy SS2 does not address the decline in village high streets, including Wadhurst, Mayfield and Rotherfield. • Argues that high-quality housing near village centres could increase local occupancy and footfall, and raises concerns that some allocated sites may be undeliverable due to ownership or covenant issues.	• The Council notes concerns regarding the vitality of village centres and the potential role of housing in supporting local services and businesses. Policy SS2 seeks to deliver sustainable growth across the district and is supported by policies that promote the vitality and viability of town and village centres. • Site allocations have been informed by a comprehensive assessment process, including considerations of deliverability, suitability and availability. Deliverability will continue to be monitored, and all sites will be required to demonstrate that any ownership, legal or other constraints can be	No change required

	satisfactorily addressed before development can proceed.	
Eastbourne and Pevensey Pilates • Objects to Policy SS2 for the reasons set out in Pevensey Parish Council's submission, adopting concerns relating to site suitability, infrastructure and local impacts.	See response to Pevensey Parish Council.	See response to Pevensey Parish Council.

Local Residents	**WDC Response**	**Changes made to policy/chapter**
• Many residents object to the scale and distribution of housing, particularly around Uckfield, Maresfield, East Hoathly, Halland, Laughton, Horam, Frant, Hailsham/Upper Dicker, Pevensey/Westham and the A22/A27 corridors. • Common concerns include inadequate roads, congestion, car dependency, limited public transport, pressure on schools, GP services, water supply, wastewater treatment and electricity infrastructure. • Residents raise repeated objections to large strategic or option sites, especially Owlsbury Farm, Laughton Park Farm/OEH1, OARL1, Horam/HOR6, Frant sites and Peelings Lane/WES7. • Environmental concerns include loss of greenfield and agricultural land, harm to ancient woodland, SSSIs and protected species, biodiversity loss, flood risk, sewage pollution, water stress,	• The Council acknowledges the concerns raised regarding the scale and distribution of growth, infrastructure capacity, environmental impacts and the deliverability of specific site allocations. The Local Plan seeks to balance the need to meet housing and employment requirements with the protection of the district's valued environmental assets, landscape character and the quality of life of existing and future communities • The spatial strategy and site allocations have been informed by extensive evidence, including consideration of reasonable alternatives, sustainability appraisal findings, infrastructure evidence, environmental constraints and detailed site assessments. A range of sites across different settlements has been identified to	SHELAA sites reviewed as well as updates to other evidence studies including the settlement hierarchy, windfall allowances and subsequent allocations to ensure growth needs are being met as far as possible. IDP updated. Further work undertaken on landscape. Relevant policies updated to reflect latest evidence.

landscape harm and impacts on the High Weald National Landscape and South Downs National Park setting. • Several residents argue that the housing need figure is unrealistic or should be challenged, while others are concerned that the proposed target is too low and may risk plan soundness if the standard method need is not met. • Some respondents support a more dispersed approach, smaller sites, brownfield-first development, community-led housing, self-build, affordable housing, rural exception sites and stronger infrastructure-led planning.	support a balanced pattern of growth and avoid undue reliance on any single location. • Infrastructure planning has been undertaken alongside the preparation of the Local Plan through engagement with infrastructure providers and statutory consultees. The Infrastructure Delivery Plan identifies infrastructure requirements arising from growth, and development proposals will be expected to provide or contribute towards necessary infrastructure and mitigation measures, with site-specific impacts assessed through future planning applications • The Plan includes policies to protect and enhance the natural environment, manage flood risk, secure biodiversity net gain, protect water resources and conserve landscape character and designated assets. Housing provision has been informed by national policy, evidence and local constraints, whilst support for measures such as dispersed growth, smaller sites, brownfield development, affordable housing, self-build and infrastructure-led development has helped inform the Plan's overall strategy and policy framework	

Policy SS3: Gypsy, Traveller and Travelling Showpeople – Accommodation Needs

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 44	**Support:** 24	**Neutral:** 10	**Object:** 10

Policy SS3 – Gypsy, Traveller and Travelling Showpeople – Accommodation Needs		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Southern Water • Comment made on the need to consider infrastructure crossing any allocation sites.	• Comment noted. The issue must be addressed further at planning application stage, where design and layout will be considered in detail. Policy INF4 does consider utilities and will need to be complied with.	No change required.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Eastbourne Borough Council • Asked whether the Council is able to help Eastbourne Borough Council meet its identified need for 3 pitches.	• Comment noted. • Further work undertaken means the plan allocations do not exceed the identified needs and therefore we cannot assist in this instance.	No change required.
Rother District Council • Support draft policy and suggest that the Plan would benefit from a short paragraph explaining the East Sussex Gypsy and	• Support noted. • The suggestion to clarify transit need is noted, however the transit need does not result in any policy or site allocations, thus the Plan	No change required.

Traveller Accommodation Assessment findings on transit need.	does not specifically refer to it. The evidence base will remain public for further detail on GTTSP matters.	
Sevenoaks District Council • Noted the requirements set out in the policy and supporting text and advised that there is unmet need within their area.	• Comment noted. • Further work undertaken means the plan allocations do not exceed the identified needs and therefore we cannot assist in this instance.	No change required.
Tunbridge Wells Borough Council • Support the draft policy • The Gypsy and Traveller Accommodation Assessment should be reviewed to account for the revised Planning Policy for Traveller Sites definition.	• Support noted. • The Council are planning for need under the revised definition.	No change required.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council • Support draft Policy SS3.	• Support noted.	No change required.
Rotherfield Parish Council • Support draft Policy SS3.	• Support noted.	No change required.
Withyham Parish Council • Support draft Policy SS3.	• Support noted.	No change required.
East Hoathly with Halland Parish Council • Smaller Gypsy and Traveller sites should be favoured.	• Comment noted. • Site size and distribution has been considered through the allocation process and wider policy approach.	No change required.

Heathfield and Waldron Parish Council • Support the draft policy. • Requests clearer policy wording on the distribution of provision.	• Support noted. • The request for clearer distribution of provision is noted and considered in the policy drafting and supporting text.	No change required.
Polegate Town Council • Support the draft policy • Notes that where sites are allocated, the traveller community does not always use them for various reasons.	• Support noted. • The comment is noted and delivery will be monitored as part of the Local Plan.	No change required.
Westham Parish Council • The Plan should take into account the siting of temporary and permanent sites and their impact on existing communities.	• Comment noted. • Existing authorised Gypsy and Traveller sites have been assessed through the accommodation and land availability evidence to determine whether there is potential for extension or intensification, alongside sites submitted through the Call for Sites process. The suitability of both temporary and permanent sites, including their relationship with and impact on existing communities, has been considered through the site assessment and allocation process.	No change required.
Willingdon and Jevington Parish Council	• Comment noted. • The Council has carried out a detailed site assessment to identify all deliverable or	No change required.

• Objects to draft policy and states that no land is available in the parish to accommodate the identified need.	developable options. The process is set out in full in accompanying evidence base documents.	
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
None		
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
<u>Conservators of Ashdown Forest</u> • Commented that provision is likely to reduce impacts on Ashdown Forest.	• Comment noted. • The Council continue sto assess potential impacts on Ashdown Forest through the HRA and site assessment process.	No change required.
<u>Village Concerns</u> • Supports draft policy.	• Support noted.	No change required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Local residents raised the following grouped issues: • Support expressed for draft policy. • Concern that travellers who have stopped travelling may be treated differently from other groups whose ethnicity entitles them to special provision. • Preference for smaller sites for individual families rather than a single large site. • Appropriate facilities should be provided on-site. • Large developments should contribute to addressing the identified need on-site.	• Comments noted. • The Council recognises the need to provide Gypsy, Traveller and Travelling Showpeople accommodation while ensuring sites are suitable. Existing authorised sites and potential new sites have been assessed through the site selection process, taking account of planning, environmental, infrastructure, residential amenity and deliverability considerations, including site size and capacity where relevant. • The identified need is based on the Council's evidence base and will be kept under review. The Council have	Policies in the plan have been updated considering a number of points made to this policy. Further site considerations have also been evidenced to support allocations included in the Plan.

• Concern about increasing numbers of people living in camper vans in and around Ashdown Forest. • Objection to the use of greenfield land and concern that greenfield sites should be protected. • Provision should be made as part of larger housing developments. • Some respondents considered that sites should only provide temporary stops. • Concern that provision should be subject to payment of tax by occupiers. • Concern that the policy omits reference to protection of existing lawful pitches and the quality of the residential environment. • The impact on settled residents should be better considered. • Changes were requested to better reflect the needs and aspirations of Gypsy, Traveller and Travelling Showpeople communities, support social inclusion and respect cultural practices. • Concern about the ghettoisation of travellers within sites.	sought to address that specific need by assessing and allocating arrange of sites; smaller to medium sized sites, and new sites as well as the extension/intensification/permanence and retention of existing sites. Approaches have been made to strategic site allocations to contribute to provision and will be further scoped should need arise. • The Local Plan will seek to protect existing lawful sites and ensure a high-quality living environment for occupiers and neighbouring residents. • Site management, enforcement and mitigation measures will be addressed through policy requirements and planning application processes where necessary.	

Focused Local Plan Consultation

Total: 70	**Support:** 39	**Neutral:** 12	**Object:** 19

Policy Ref: SS3 – Gypsy, Traveller and Travelling Showpeople Accommodation Needs		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • No specific comments on Policy SS3. • Recommends ecological assessment and mitigation to protect habitats and species, deliver biodiversity gains and consider archaeological impacts where major development or Archaeological Notification Areas are affected.	• Comments noted. Ecological, biodiversity and heritage matters will continue to be considered through the site assessment, allocation process and planning application stage where relevant.	No change required.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tonbridge and Malling Borough Council • Notes that WDC have identified a potential supply of 27 pitches and further work is needed to identify sufficient pitches. • Notes TMBC's own 2025 assessment identifies a need for 33 additional pitches, with limited suitable site supply.	• Comments noted. • The Council recognises the current shortfall between identified need and potential supply and has continued with further work to identify suitable sites ahead of Regulation 19.	Policies in the plan have been updated. Further site considerations have also been evidenced to support allocations included in the Plan.
Tunbridge Wells Borough Council • Supports the amendment to Policy SS3 to reflect the ethnic definition of Gypsies, Travellers and Travelling Showpeople.	• Comments noted. • The Council recognises the current shortfall between identified need and potential supply and has continued	No change required

• Notes that WDC will continue further work including an updated East Sussex GTAA and further Call for Sites. • Notes WDC's request for assistance with unmet need.	with further work to identify suitable sites ahead of Regulation 19.	
Hastings Borough Council • Notes a need for 51 Gypsy and Traveller pitches and 3 Travelling Showpeople plots, with six proposed sites delivering 27 pitches, and welcomes the planned update to the accommodation assessment before submission.	• Support noted.	No change required.
Eastbourne Borough Council • Notes WDC's proposed provision for 51 pitches and 3 plots and welcomes the summary of joint working between East Sussex planning authorities.	• Support noted.	No change required.
Lewes District Council • Welcomes the comprehensive account of joint working undertaken by East Sussex planning authorities. • Notes the value of cross-boundary working and suggests future exploration of GIS to support responsive infrastructure planning.	• Support noted.	No change required.
Rother District Council • Acknowledges WDC's pitch and plot needs, notes current unmet need, and supports	• Support noted. • The Council recognises the current shortfall between identified need and potential supply and has continued	No change required.

further site assessment through the agreed county-wide methodology.	with further work to identify suitable sites ahead of Regulation 19.	
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council • Supports Policy SS3 and considers that early enactment and delivery of sites would help address unofficial and illegal sites.	• Support noted.	No change required.
Warbleton Parish Council • Supports Policy SS3.	• Support noted.	No change required.
Heathfield and Waldron Parish Council • Supports policy in principle.	• Support noted.	No change required.
Rotherfield Parish Council • Supports Policy SS3.	• Support noted.	No change required.
Uckfield Town Council • Supports the policy but asks that planning applications for such sites take account of impacts on adjacent land, including ecological and infrastructure impacts.	• Support noted. • Site-specific impacts will be considered through allocation work and planning applications.	No change required.
Wadhurst Parish Council • Supports the policy and considers that delivery of planned sites may help reduce unofficial and illegal sites and strengthen enforcement.	• Support noted.	No change required.
Chalvington with Ripe Parish Council	• Support noted.	No change required.

• Generally, supports Policy. • Notes that a defined evidence base and land availability assessment provide a plan-led approach.		
Frant Parish Council • The need identified for 51 pitches has not been sufficiently evidenced and the methodology is not transparent. • Concerns are raised that the policy is insufficiently defined and could allow a greater level of provision than is normally permitted for comparable forms of housing development.	• Comment noted. • The requirement for 51 pitches is based on the Council's Gypsy and Traveller Accommodation Assessment (GTAA), which forms part of the Local Plan evidence base and uses an established methodology to identify accommodation needs over the plan period. • The policy seeks to ensure sufficient provision is made to meet the identified need. All proposals will be assessed against the policy criteria, other relevant Local Plan policies, and national planning policy to ensure that development is appropriate.	No change to policy.
Little Horsted Parish Meeting Asks whether there will be a management policy for sites once allocated.	• Comment noted. • Site management and planning conditions can be considered through planning application controls, and other measures/legislation, where appropriate.	No change required.
Other Consultee Bodies / Organisations	**WDC Response**	**Changes made to policy/chapter**
Conservators of Ashdown Forest	• Comments noted. The Council will continue to assess potential impacts on Ashdown Forest through the HRA and site assessment process.	No change required.

• The provision of sites through allocation could reduce unauthorised overnighting on Ashdown Forest, • Advises that planning for new or expanded sites must avoid threats to Ashdown Forest and should not be considered suitable within the Zone of Influence. Welcomes reference to Habitat Regulations Assessment.		
The Woodland Trust • Object to the inclusion of sites that affect ancient woodland. • Recommends minimum 50 metre buffers to ancient woodland unless evidence demonstrates otherwise and requests surveys for ancient and veteran trees.	• Other policies in the plan control the impacts of proposed development on areas such as Ancient Woodland (Policy NE4). The plan should be read as a whole, and proposals will be required to comply with all relevant policies in the plan.	No change required.
High Cross Investments (2023) Ltd • Supports the policy. • Welcomes identification of needs through the GTAA and the commitment to meeting needs through specific pitch and plot provision.	• Support noted.	No change required.
Community Project Ltd (Laughton Lodge) • Supports the policy.	• Support noted.	No change required.
Parkwood Hall • Accepts the policy but asks for evidence showing how the need for Gypsy, Traveller and Travelling Showpeople provision has	• Comments noted. • The need figure is derived from the GTAA evidence base, and WDC is continuing cross-boundary	No change required.

been calculated, including the basis for the 51-site figure and whether neighbouring authorities have been consulted on provision.	engagement with neighbouring authorities.	
Local Residents	**WDC Response**	**Changes made to policy/chapter**
• Mixed support and objection to the policy. Some residents supported the need to provide Gypsy and Traveller accommodation, while others objected to specific sites or considered them unsuitable. • Several respondents questioned the evidence and methodology behind the identified need for 51 pitches, and whether future needs and cross-boundary options had been fully considered. • Some comments suggested that existing sites, brownfield land and previously developed land should be prioritised, and that Gypsy and Traveller developments should be assessed against the same planning considerations as other residential development. • Concerns were raised regarding site suitability, impacts on local communities and the environment, planning compliance, enforcement, anti-social behaviour, waste management and crime. • Some respondents supported planned provision in principle, particularly where sites are well located in relation to services and amenities and include appropriate facilities.	• Comments noted. • The Council recognises the need to provide Gypsy, Traveller and Travelling Showpeople accommodation while ensuring sites are suitable. • The identified need is based on the Council's evidence base and will be kept under review. This GTAA has been undertaken with other East Sussex authorities, using a consistent methodology across all. Cross boundary work continues. • Sites have been assessed through the site selection process, taking account of planning, environmental, infrastructure and deliverability considerations, noting the significant need for GTTSP provision. • Site management, enforcement and mitigation measures will be addressed through the wider planning application process and other legislation as required.	Further work has been undertaken to consider sites and policy considerations and the policies have been updated accordingly.

• A small number of comments sought greater clarity on site selection and engagement with Gypsy and Traveller communities, while others were neutral or provided no comment. • Several comments were neutral or stated no comment/lack of expertise.		

SS4: Retail Provision and Town Centres

WDC Response to the Regulation 18 Consultations

Total: 71	Support: 36	Neutral: 15	Object: 20

Policy SS4: Retail Provision and Town Centres		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Town Centre Strategy (page 78) 4.60 – amend final sentence as follows: 'An important focus for our town centres will be to <u>improve accessibility (particularly for sustainable modes of transport) and</u> deliver opportunities to improve the public realm, where we can, to create attractive spaces for our community.' • Economy, Paragraph 2.28, Town Centre Strategy, Paragraph 4.60 and Distribution of	Noted	The chapter has been reworked. The plan should be read as a whole.

employment land, Paragraph 4.62: We suggest consideration is made, in regard to high streets, to adopting a proactive approach to developing shared workspace		
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
None		
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
<u>Developers and agents</u> **Aldi Stores Limited** • Policy should make reference to allocations sites	• The Wealden local Plan is not proposing allocations for retail provision in line with the findings of the Town Centre Study (2022, 2026).	No changes required
Hertfordshire Holdings • Policy should be cross referenced with policy TC2, or the policies should be combined.	• The Plan should be read as a whole. All relevant policies will be applied upon consideration of planning applications.	No changes required
<u>Organisations with specific interest</u> **CPRE Sussex** • Policy should include: Out of town retail centres or retail development will not be supported unless exceptional circumstances can be demonstrated	• Such approach would be contrary to national policy	No changes required
Eastbourne Eco Action Network CIC • The 20-minute neighbourhood approach would reduce need for travel.	• Noted	No changes required

Uckfield Chamber of Commerce • Supportive of the policy	• Welcome support	No changes required
<u>Residents Associations</u> **The Working Group Against Over Development** • Policy should include: Out of town retail centres or retail development will not be supported unless exceptional circumstances can be demonstrated	• Such approach would be contrary to national policy	No changes required
Village Concerns • Supportive of the policy	• Welcome support	No changes required
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Arlington Parish Council • Supportive of the policy • Local retailer and other community assets should be protected	• Welcome support • There is a supportive policy INF7 regarding protecting the loss of local services and community facilities	No changes required
East Hoathly with Halland Parish Council • Local retail outlets and other community assets should be protected and safeguarded against being converted into residential properties. • The 20-minute neighbourhood approach would significantly reduce need for travel.	• The matter is addressed within other policies or the Plan. The Plan should be read as a whole.	No changes required
Heathfield & Waldron Parish Council • Supportive of the policy	• Welcome support	No changes required

Herstmonceux Parish Council • Supportive of the policy • Decision should align with policies • Concerns over conversions on purposefully neglected and left empty high street properties that have failed to be advertised as retail, or looked after properly	• Welcome support • Planning decisions are made based on the Development Plan, national policy and other material planning consideration, requiring an overall judgement weighting the benefits of a proposal against its harms.	No changes required
Horam Parish Council • Lack of definition of optimising dwell time and spend, comparison and convenience goods • The timing for the evidence base does not accord with the plan period	• Comment noted • References are contained within background evidence and supporting strategies.	No changes required
Isfield Parish Council • The plan fails to resist out of town centre retail proposals in line with national policy	• The matter is addressed under policy TC2 which cross reference national policy with regard to location of retail development	No changes required
Mayfield and Five Ashes Parish Council • Supportive of the policy	• Welcome support	No changes required
Pevensey Parish Council • Supportive of the policy	• Welcome support	No changes required
Polegate Town Council • Supportive of the policy • Businesses should be encouraged to create employment and generate local economies	• Welcome support • The Council's economic development team seeks to support new business and employment generation within the district	No changes required
Rotherfield Parish Council	• Welcome support	No changes required

• Supportive of the policy		
Uckfield Town Council • Supportive of the policy • A greater focus should be placed on sustainability • Improvements should be focused on town centres • The policy may not adequately address the need to protect Wealden's rural character and biodiversity • Mixed-use development should be promoted • The policy might overlook the potential for fostering innovation and technology-based industries	• Welcome support • The other matters are addressed in other areas of the Plan which should be read as a whole (climate change policies, economy policies	No changes required
Westham Parish Council • Distinction should be made between the provision of retail space and light industrial premises and the plan should identify suitable areas for their provision	• Retail space falls under retail provision where light industrial falls under employment provision. The plan is not proposing allocations for retail provision but is identifying land for employment provision.	No changes required
Willingdon and Jevington Parish Council • Object to the provision of employment space along the A2270.	• Comments noted, this will be responded to in the site allocations section of the Local Plan	No changes required
Withyham Parish Council • Supportive of the policy	• Welcome support	No changes required
Local Residents	**WDC Response**	**Changes made to policy/chapter**

• Maintain free short-term parking. • Improve communications infrastructure to support co-working spaces. • Concentrate retail development in Uckfield. • Recognise the relationship between parking provision/costs and town centre attractiveness. • Prioritise small, locally owned shops and restaurants. • Distribute retail and service space throughout residential areas for accessibility and convenience. • Consider the impacts of online shopping on retail demand. • Resist out-of-centre retail proposals in line with national policy. • Focus on small shops, local businesses, craftspeople and producers. • Direct retail development exclusively to town centres. • Balance employment floorspace growth with sustainability, infrastructure capacity, and protection of rural character and landscapes. • Provide additional parking if housing growth increases. • Ensure large development areas include local shopping/collection centres. • Restrict supermarkets to food sales. • Avoid substantial changes to town centres. • Provide modern, accessible retail floorspace where needed.	• These comments have all be noted • The evidence base on retail and town centre provision has identified need to direct policy decisions • Small scale retail and new starter business are encouraged in town centre areas • Planning policies will support growth in retail in the most sustainable and appropriate locations, such as town centres • Other policies within the Local Plan will assist, in relation to a number of comments • Other non-planning matters are outside the remit of the Local Plan but will be passed on to other departments within the Council	Many of these points are addressed above and relevant policies have been updated as they do not all relate to Policy SS4.

• Convert outdated retail premises to high-tech employment space. • Encourage small-scale farm shops in rural locations. • Oppose out-of-town retail parks. • Retain shops in villages. • Support small shops, arts and crafts businesses. • Provide public toilets. • Avoid car-dependent out-of-town retail development. • Increase provision of clothing stores in town centres. • Reuse existing retail space before developing new retail floorspace. • Clarify protection for smaller retail outlets. • Define terms such as “optimising dwell time and spend”, “comparison goods” and “convenience goods”. • Ensure the evidence base aligns with the plan period. • Address traffic impacts associated with retail development. • Fill vacant industrial units before allocating further employment land. • Repurpose empty shops for housing rather than developing rural sites. • Place greater emphasis on manufacturing employment. • Reduce overall provision of retail outlets.		

• Consider retail areas for housing development where they are underused. • Provide more temporary stalls and markets in town centres. • Focus retail strategy on town centres. • Address the growth of charity shops and whether they reflect genuine retail need. • Question the need for additional retail floorspace given growth in online retail. • Support the 20-minute neighbourhood concept. • Direct expansion to town locations rather than out-of-town areas. • Protect the importance of greenfield sites. • Monitor and actively bring vacant premises back into use. • Oppose retail development away from town centres.		

Focused Local Plan Consultation

Total: 103	**Support:** 33	**Neutral:** 34	**Object:** 28

Policy SS4: Retail Provision and Town Centres		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
No Responses		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
Tunbridge Wells Borough Council Noted the increased retail capacity identified by the 2026 Town Centre Study, supported Wealden meeting its own retail need, and made no further comment.	Support is noted. The policy seeks to meet identified retail needs within Wealden's centre hierarchy.	No change required.
Eastbourne Borough Council Requested greater recognition of Eastbourne's role across the wider market area and assessment of the effects of south Wealden and Hailsham retail proposals on Eastbourne town and district centres.	The cross-boundary concern is noted. Appropriate proposals would be considered through the sequential and impact tests, including relevant effects on nearby centres.	This point will be covered in the general review and streamlining of the policy.
Town/Parish Councils	**WDC Response**	**Proposed Changes to Policy**
Fletching Parish Council Supported restricting retail to town centres; cited congestion, emissions and harm to Uckfield from Maresfield out-of-town development; considered vacancy an incomplete health indicator; and sought clarity over Oakwood Park frontage.	Support for the town-centre-first approach is noted. Centre health would be assessed using a range of indicators, with out-of-centre proposals subject to sequential and impact assessment. Town Centre and retail evidence has been updated and is published alongside the Local Plan,	No change required.

Mayfield and Five Ashes Parish Council Supported the policy and its application to smaller settlements, but raised concern about conversion of a Mayfield High Street retail unit to housing.	Support is noted. Decisions on individual premises would continue to be made against the development plan and relevant permitted development provisions.	No change required.
Warbleton Parish Council Sought pay-on-use parking at new retail schemes or free town-centre parking to avoid disadvantaging high-street businesses.	The relationship between parking provision and town-centre vitality is noted. Parking arrangements are addressed through transport and site-specific considerations.	No change required to SS4.
Heathfield and Waldron Parish Council Supported the policy in principle.	Support is noted.	No change required.
Arlington Parish Council Supported the emphasis on thriving communities and retail involvement.	Support is noted.	No change required.
Rotherfield Parish Council Supported the policy.	Support is noted.	No change required.
Pevensey Parish Council Objected to Policy CC9 and Figure 13 by reference to its separate Question 15 submission; no substantive SS4 comment was provided.	The representation related to another policy and would be considered under that consultation question.	No change required to Policy SS4.
Little Horsted Parish Meeting Supported restricting retail to town centres; repeated concerns about Maresfield's effects, vacancy and retail mix indicators, Oakwood Park frontage, and safeguarding Uckfield High Street.	The concerns are noted and aligned with the town-centre-first approach. Centre health would be considered using quantitative and qualitative evidence, supported by the Town Centre and retail evidence base.	No change required.

Uckfield Town Council Objected to the increased floorspace target and feared displacement to out-of-town sites, harm to Uckfield High Street and parking risks. Requested clearer longer-term vision and clarity over Seghers Place, Holy Cross School and related infrastructure opportunities.	The concerns are noted. SS4 directed growth to the town centre hierarchy, while specific sites and infrastructure proposals would be addressed through relevant allocation, transport and infrastructure policies. Retail need is addressed through evidence in the Retail and Town Centre study.	No change required.
Wadhurst Parish Council Supported the policy and its extension to smaller settlements, and requested an Article 4 direction to protect rural retail and commercial premises from residential conversion.	Support and the safeguarding concern are noted. Article 4 directions are separate regulatory measures requiring local evidence and justification.	No change required to Policy SS4.
Horam Parish Council Noted that retail growth would depend on housing growth and requested adequate parking, public transport and highway capacity wherever new floorspace was delivered.	The need to align retail development with transport capacity and accessibility was noted. A transport Assessment has been undertaken to support the development of the Local Plan.	No change required.
Chalvington with Ripe Parish Council Generally supported SS4 and considered its town-centre focus consistent with national policy.	Support is noted.	No change required.
Isfield Parish Council Sought restriction of retail to town centres and cited congestion, emissions and harm to Uckfield from Maresfield development.	The concerns support the town-centre-first approach and were noted.	No change required.
Site Promoters	**WDC Response**	**Proposed Changes to Policy**

Marks & Spencer PLC Supported the identified retail capacity but considered vacant units alone unlikely to meet need. Argued that sequentially preferable, sustainable sites associated with housing growth could meet quantitative and qualitative needs where centres lacked suitable sites.	The evidence recognises that capacity did not itself justify development and that proposals must satisfy the sequential and impact tests. Existing centres remained the priority, with other sustainable opportunities assessed on their merits.	No change required.
High Cross Investments (2023) Ltd Supported SS4 and considered the proposed High Cross Farm neighbourhood centre consistent with the policy because it would meet day-to-day needs, reduce short car trips and complement Uckfield town centre.	Support is noted. Any local centre proposal would be assessed against scale, accessibility, sequential and impact requirements.	No change required.
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Crowborough and District Chamber of Commerce Supported the policy.	Support is noted.	No change required.
Dicker Residents Association Supported the proposed policy.	Support is noted.	No change required.
Conservators of Ashdown Forest Expressed no position on SS4 in relation to Ashdown Forest.	The neutral response is noted.	No change required.
Community Project Ltd (Laughton Lodge) Supported measures to improve retail and town-centre health, particularly public-realm	Support is noted. Detailed centre-specific opportunities would be addressed through relevant town centre policies and delivery work, including Neighbourhood Plans.	No change required.

improvements, but requested clearer identification of centres to be improved.		
Peacock & Smith Did not object but requested recognition that existing-centre units may not meet larger national retailers' format requirements and that new provision could improve choice and reduce expenditure leakage.	The distinction between quantitative capacity, qualitative need and suitable unit formats is noted. Proposals would remain subject to the town centre hierarchy and relevant tests.	No change required.
Martin Grant Land Considered housing growth near Uckfield would support town-centre spending, retain economically active residents and reduce travel.	The relationship between well-located housing growth and town-centre vitality is noted.	No change required.
Turley Considered housing growth, including Hempstead Lane, would support Uckfield's existing retail facilities and economically active population.	The relationship between well-located housing growth and town-centre vitality is noted.	No change required.

Local Residents	WDC Response	Proposed Changes to Policy
Local Residents • Mixed support for the town-centre-first approach, with repeated calls to reuse vacant premises, regenerate high streets and support independent businesses. • Concerns that fixed floorspace targets did not reflect online shopping, changing demand, vacancies or environmental limits.	The range of support and objections is noted. Policy SS4 seeks to direct proportionate retail growth to existing centres, protect vitality and viability, and respond to identified capacity. Delivery would work alongside transport, climate, infrastructure and environmental policies. Quantitative capacity would not itself justify development, and proposals would remain	General amendments and streamlining of the policy have been undertaken No further changes are required to the policy or supporting text.

• Strong opposition to out-of-town and edge-of-centre retail because of congestion, emissions, car dependency and harm to existing centres. • Frequent requests for adequate free parking, reliable public transport, walking and cycling access, and sufficient highway capacity. • Requests for clearer links to housing growth, climate, flood risk, water and wastewater capacity, biodiversity, local employment and community infrastructure. • Place-specific concerns included Polegate's status and outdated evidence, Uckfield and Maresfield impacts, Hailsham vacancies, and the need for clearer centre-specific delivery. • Suggestions included flexible mixed-use premises, homes above retail, improved public realm, farmers' markets and stronger protection for village shops. • Some responses supported the policy without qualification or made no substantive comment.	subject to the appropriate sequential and impact assessment.	

Policy SS5: Provision of Employment Space

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 422	**Support:** 26	**Neutral:** 36	**Object:** 360

Policy SS5 – Provision of Employment Space		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
National Highways • Support draft Policy SS5. • Employment floorspace should be allocated in sustainable locations. • National Highways should be consulted on employment site allocations before Regulation 19. • The cumulative impact on the strategic road network, including neighbouring authority impacts, should be considered.	• Comments noted. Transport evidence is updated alongside the regulation 19 plan and developed in consultation with National Highways.	Policy approach updated in line with evidence.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Eastbourne Borough Council • Notes the employment land shortfall. • Supports the additional call for sites. • Acknowledges the Council's commitment to help meet Eastbourne's need, subject to suitable land being identified.	• Comments noted. The Council has considered whether suitable employment land can be identified and will assess transport implications through the evidence base and duty to cooperate discussions.	No change proposed at this stage. Further work will inform the Regulation 19 position.

• Transport impacts in the south of the district require strong consideration.		
Rother District Council • Supports the additional call for sites and further investigation of internal opportunities for employment land.	• Comments noted. The additional call for sites and ongoing evidence work will inform whether further suitable employment land can be identified.	No change proposed.
Sevenoaks District Council • Notes the identified shortfall and additional call for sites. • Indicates Sevenoaks is likely to allocate employment floorspace above its own need but not further retail floorspace.	• Comments noted. Cross-boundary employment and retail matters continue to be considered through duty to cooperate engagement.	No change proposed.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Arlington Parish Council • Supports Policy SS5. • Requests public EV charging points, particularly in rural areas.	• Comments noted. EV charging provision is addressed through wider transport, infrastructure and development management policy considerations.	No change proposed.
Crowborough Town Council • Objects to Policy SS5. • Larger facilities are needed to allow businesses to grow. • Further employment infrastructure is required in Crowborough.	• Comments noted. The distribution and scale of employment provision has been reviewed through the site selection and employment evidence process.	No change proposed.
Frant Parish Council • Objects to Policy SS5.	• Comments noted. The Council considers the balance between employment need, spatial strategy, rural character and transport accessibility.	No change proposed.

• Considers the policy does not adequately reflect the rural and spatial character of the district. • Raises concerns about excessive employment land provision. • Requests further employment space in the south of the district.		
Heathfield & Waldron Parish Council • Objects to Policy SS5. • Highlights vacant office space and the effect of working from home on employment space needs.	• Comments noted. Employment need evidence reviewed to ensure changing work patterns are properly considered.	No change proposed.
Herstmonceux Parish Council • Supports Policy SS5.	• Support noted.	No change proposed.
Horam Parish Council • Objects to Policy SS5. • Considers the evidence base does not relate clearly to the policy.	• Comments noted. The Council has reviewed how the evidence base supports the policy wording and explanation.	Changes have been made to SS5.
Isfield Parish Council • Objects to Policy SS5. • Questions use of the Past Take Up method to calculate need. • Requests that the evidence be reconsidered.	• Comments noted. The Council has reviewed how the evidence base supports the policy wording and explanation.	Changes have been made to SS5.
Maresfield Parish Council • Objects to Policy SS5.	• Comments noted. The Council has updated the supporting evidence and supporting text of the policy.	Changes have been made to SS5 and supporting text.

• Considers reliance on the Past Take Up model is flawed and does not account for the district's rural and spatial character.		
Mayfield and Five Ashes Parish Council • Supports Policy SS5.	• Support noted.	No change proposed.
Pevensey Parish Council • Objects to Policy SS5. • Considers paragraph f is too broad and could harm the viability and vitality of local centres. • Requests caveating to retain ground floor uses.	• Comments noted.	Changes have been made to SS5 and supporting text.
Polegate Town Council • Objects to Policy SS5. • Employment space should be encouraged and made easier for companies to establish across the district.	• Comments noted. The policy seeks to support appropriate employment provision across the district subject to evidence and site suitability.	No change proposed.
Rotherfield Parish Council • Supports Policy SS5.	• Support noted.	No change proposed.
Uckfield Town Council • Objects to Policy SS5. • Does not support paragraph a. • Considers employment allocations should be considered in all developments over 300 homes.	• Comments noted. The Council has considered whether the policy threshold and relationship with strategic housing growth remains appropriate.	No change proposed.
Westham Parish Council	• Comments noted. The Council has considered whether the policy and	No change proposed.

• The Plan should distinguish between areas suitable for retail/service space and industrial/office space.	supporting text provide sufficient clarity on employment and retail/service uses.	
Withyham Parish Council • Supports Policy SS5.	• Support noted.	No change proposed.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
AM Work Space Limited • Objects to Policy SS5. • Considers there is a significant undersupply of employment floorspace against identified need. • Considers the policy is contrary to the NPPF. • States the Council should help meet Eastbourne Borough Council's employment shortfall.	• Comments noted. The Council has assessed the employment land requirement, potential supply and cross-boundary needs through the evidence base and duty to cooperate.	Policy SS5 and site allocations have been reviewed and updated.
Bryan Thomas Limited • The Plan should reinforce the A22 economic corridor.	• Comments noted. The role of key corridors has been considered through the spatial strategy and employment site assessment process.	No change proposed.
CPRE Sussex • Objects to Policy SS5. • Questions use of the Past Take Up method. • Requests that the evidence be reconsidered.	• Comments noted. The Council has reviewed the employment need evidence and justification for the preferred method.	Policy SS5 and site allocations have been reviewed and updated.
Crowborough and District Chamber of Commerce • Objects to Policy SS5.	• Comments noted. The Council has undertaken further work on employment provision.	Policy SS5 and site allocations have been reviewed and updated.

• States that additional space must be identified to meet identified need.		
Dicker Residents Association • Supports Policy SS5.	• Support noted.	No change proposed.
Forest Row Local CBS Limited • Objects to Policy SS5. • Considers the Past Take Up method does not account for countryside and environmental limits. • Considers the Plan fails to balance need against social and environmental effects. • Highlights that the Labour Supply method shows a significantly reduced need. • Considers there is overprovision of employment land.	• Comments noted. The Council has reviewed evidence to appropriately balance employment need, environmental constraints and social impacts.	Policy SS5 and site allocations have been reviewed and updated.
Formula Land (Polegate Limited) • Considers it is unclear how the Council concluded employment need could not be met. • Considers the approach is contrary to the NPPF.	• Comments noted. The Council will ensure the evidence clearly explains the supply position and any unmet need.	Policy SS5 and site allocations have been reviewed and updated.
Grosvenor Property UK Limited • Supports Policy SS5.	• Support noted.	No change proposed.
Hertfordshire Holdings • Planned provision should fully meet assessed need, including unmet need from adjoining authorities.	• Comments noted. Employment need and cross-boundary matters have been considered alongside infrastructure planning and the Infrastructure Delivery Plan.	Policy SS5 and site allocations have been reviewed and updated.

• Infrastructure improvements needed to implement strategic allocations should be set out in policy.		
Hop Farm Real Estate Limited • Supports Policy SS5. • Employment floorspace strategy should align with the housing delivery spatial strategy.	• Comments noted. The relationship between employment provision and housing growth has been considered through the spatial strategy and its supporting evidence.	A number of policies have been updated in light of updated evidence.
Nevill Estate Company • Supports Policy SS5. • Employment floorspace strategy should align with the housing delivery spatial strategy.	• Comments noted. The relationship between employment provision and housing growth has been considered through the spatial strategy and its supporting evidence.	A number of policies have been updated in light of updated evidence.
SE Marts Ltd • Objects to Policy SS5. • The cattle market should be recognised as an important resource supporting a specialist employment sector. • Requests appropriate allocation and supportive policies.	• Comments noted. The role of specialist employment sectors and existing employment assets is considered through the evidence base and site assessment work.	No change proposed.
South West Strategic Development • Objects to Policy SS5. • Considers the Plan fails to identify sufficient land to meet identified need. • States that need from neighbouring authorities should be considered.	• Comments noted. The Council continues to assess supply against need and engage with neighbouring authorities on cross-boundary matters.	No change proposed.
The Working Group Against Over Development	• Comments noted. The Council has reviewed the employment need	No change proposed.

• Objects to Policy SS5. • Questions use of the Past Take Up method. • Requests that the evidence be reconsidered.	evidence and the justification for the selected method.	
Trafalgar Group Limited • Supports Policy SS5. • Considers the employment allocation is insufficient to meet need.	• Comments noted. The Council has considered further suitable employment land.	No change proposed.
Village Concerns • Objects to Policy SS5. • Housing development in rural areas should include mixed-use development.	• Comments noted. The relationship between employment provision, mixed-use development and rural sustainability has been considered through the wider spatial strategy.	No change proposed.
Westcott Leach Limited • Objects to Policy SS5. • Considers there is a significant undersupply of employment floorspace against need. • Considers the policy is contrary to the NPPF. • States the Council should help meet Eastbourne Borough Council's employment shortfall.	• Comments noted. The Council has further assessed the employment land requirement, potential supply and cross-boundary needs through the evidence base and duty to cooperate.	Policy SS5 and site allocations have been reviewed and updated.
Willingdon Residents Association • Does not support further allocations in Willingdon.	• Comments noted. Any further employment allocations will be assessed through the site selection process, including local constraints and impacts.	No change proposed.

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents • Residents both supported and objected to Policy SS5. • Support comments included prioritising high-tech employment space, upgrading ageing floorspace, focusing provision near road networks and population centres, supporting local shops through office provision, encouraging distinctive design, and aligning employment floorspace with housing delivery. • Objections commonly questioned the Past Take Up method and argued that the Labour Supply method would show a lower need. • Concerns were raised that the policy could overprovide employment land, fail to reflect Wealden's rural character, and place insufficient weight on environmental limits, countryside impacts, local population needs and social wellbeing. • Several comments raised concerns about poor transport links, increased commuting, road network impacts and wider infrastructure pressure. • Some residents argued that employment floorspace should be focused close to existing settlements, built-up areas or population centres, with reuse of existing buildings and efficient use of existing space prioritised. • Comments also sought more mixed-use development, better links between employment	• Comments noted. The Council will review the employment evidence base, including the method used to calculate need, and will consider the balance between economic need, environmental limits, rural character, transport accessibility and infrastructure capacity. Site selection and policy development will continue to consider whether employment provision is located in sustainable and suitable locations and whether existing space can be used effectively.	A number of policies have been updated in light of updated evidence. .

opportunities and local people, and active travel alternatives to private car use. • Other comments raised concerns about loss of greenfield land, lack of local need, insufficient consideration of farming, agricultural and forestry workers, and the location of strategic allocations.		

Focused Local Plan Consultation

Total: 100	**Support:** 32	**Neutral:** 19	**Object:** 49

Policy SS5: Provision of Employment Floorspace		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • No specific comments were made on Policy SS5 (Provision of Employment Floorspace). • All development proposals should be supported by an Ecological Impact Assessment (EcIA) and an Ecological Constraints and Opportunities Plan (ECOP). • Development should ensure appropriate mitigation for priority habitats and protected species, embedding biodiversity considerations from the outset rather than adding them later.	• Comments noted. Although no specific representations had been made on Policy SS5, the Council had addressed the wider ecological matters raised through the Natural Environment and Climate Change Policies within the plan.	No change to Policy SS5.

• Proposals should follow the mitigation hierarchy required by the NPPF and seek biodiversity enhancement opportunities informed by the Local Nature Recovery Strategy (LNRS).		
National Highways • The Council's currently identified employment land supply (159,530 sqm) falls short of the assessed need (194,400 sqm), and there is uncertainty over the delivery and capacity of existing commitments and allocated sites. Further assessment of employment sites will therefore be undertaken before Regulation 19. • Policy SS5 identifies the main planning mechanisms for delivering employment development, but neither SS5 nor SS6 currently explicitly commits to directing employment floorspace to sustainable locations. • It is recommended that SS5 be amended to require employment floorspace to be located in demonstrably sustainable locations, or locations capable of being made sustainable, to align with Circular 01/2022 and National Highways' expectations. • Development proposals with the potential to affect the Strategic Road Network should be supported by appropriate transport	• Comments noted. The identified shortfall and uncertainties regarding committed and allocated employment sites were recognised, and further site assessment had been undertaken before Regulation 19. Further transport work has been undertaken in consultation with National Highways.	A number of policies have been updated in light of updated evidence.

evidence, with a requirement for Transport Assessments clearly reflected in the employment policies.		
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
<u>Brighton and Hove City Council</u> • Supports the overall approach of Policies SS5 and SS6 in seeking to meet Wealden's future employment land needs. • Notes that the updated Employment Land Study identifies a requirement for 194,400 sqm of employment floorspace to 2042. • Recognises that the draft allocations and existing commitments within Policies SS5 and SS6 would deliver 159,530 sqm of employment floorspace. • Supports the Council's commitment to continue reviewing employment sites and potential allocations before the next Local Plan stage to address the remaining employment land requirement.	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.
<u>Tonbridge and Malling Borough Council</u> • Policy SS5 does not currently meet Wealden's identified employment land requirement to 2042, leaving a shortfall of 7,760 sqm compared with the objectively assessed need set out in Table 10. • Additional potential employment sites identified in Table 11 could provide up to 101,600 sqm of employment floorspace,	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

which could address the shortfall if shown to be deliverable. • Further evidence is still being prepared to assess the deliverability of these sites, so Wealden cannot yet confirm that its full employment need can be met. • Wealden has approached neighbouring authorities, including Tonbridge and Malling Borough Council, regarding potential unmet needs, but evidence on Functional Economic Market Area relationships does not clearly demonstrate a strong economic link between Tonbridge and Malling and Wealden.		
Tunbridge Wells Borough Council • TWBC notes that Wealden's updated Employment and Economic Study (2026) identifies a need for 194,400 sqm of employment floorspace to 2042, but Policy SS5 currently plans for only 159,530 sqm. • TWBC considers that Wealden should plan to meet its full identified employment land requirement rather than relying on a reduced provision level. • TWBC acknowledges that further work on employment sites and draft allocations is ongoing and will provide further comments at Regulation 19 stage. • TWBC notes that Wealden has requested assistance in accommodating any unmet	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

employment floorspace need, with a response from TWBC still being prepared.		
Eastbourne Borough Council • Notes a total employment land requirement of 16,100 sqm of office space and 178,300 sqm of industrial space. • Highlights that proposed employment allocations would provide an additional 101,600 sqm of employment floorspace, including a major allocation at Polegate (EMP1) delivering 66,730 sqm net at the A22/A27 junction. • Raises concerns about transport impacts, particularly increased commuting from Eastbourne by private car, and stresses the need for strong public transport and sustainable travel connections. • States that Eastbourne Borough Council can meet its own employment land requirements and is unlikely to require Wealden to accommodate any unmet employment land needs.	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated. Transport evidence has also been updated.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Fletching Parish Council • Objects to Policy SS5, arguing that the proposed 159,530 sqm of employment floorspace is excessive, based on an unrealistic assumption that the full housing	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

target will be delivered, and overstates future employment needs. • Challenges the 2026 Employment and Economic Study, claiming methodological flaws inflate employment land requirements through unrealistic growth assumptions, inappropriate adjustments, double-counting, and reliance on anecdotal market evidence rather than demonstrated demand. • Contends that the planned employment land supply (70.48 ha) significantly exceeds evidenced need, citing an alternative calculation suggesting a requirement of only 19.8 ha, with insufficient justification for strategic allocations including Ashdown Business Park. • Raises concerns regarding deliverability, transport impacts, infrastructure constraints, environmental effects and lack of proven market demand, concluding that Policy SS5 is not justified, effective or consistent with the NPPF and is therefore unsound.		
Little Horsted Parish Meeting • Objects to Policy SS5 on the basis that the proposed employment floorspace requirement is excessive, unjustified and based on flawed assumptions, arguing that housing delivery, forecast job growth and	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

market demand do not support the scale of provision proposed. • Challenges the evidence base underpinning the Employment and Economic Study, citing methodological flaws that it considers significantly overstate employment land needs and result in over-allocation of employment land. • Argues that evidence of demand for large strategic employment sites, including the expansion of Ashdown Business Park, is not robustly justified and lacks sufficient market, infrastructure, transport and environmental evidence. • Considers Policy SS5 unsound because it is not evidence-based or deliverable, and opposes any provision for unmet employment needs from neighbouring authorities, citing concerns about impacts on rural areas, infrastructure capacity, landscape character and parish identity.		
Isfield Parish Council • Objects to Policy SS5, arguing that the proposed 159,530 sqm of employment floorspace is excessive and not justified by expected housing delivery or forecast employment growth. • Questions the evidence of employment demand, citing uncertainty in the evidence base and the closure of the John Lewis	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

distribution hub at Ashdown Business Park as evidence of locational constraints. • Challenges claims of demand from high-tech and science-based businesses, stating that these are not supported by sufficient evidence. • Opposes the proposed expansion of Ashdown Business Park, citing a lack of demonstrated need, transport justification and environmental safeguards.		
Uckfield Town Council • Supports the principle of providing additional employment space to enable more people to work locally, but questions how employment growth will be balanced with housing delivery, environmental constraints and the overall spatial strategy. • Seeks greater clarity on the location and justification for the proposed employment floorspace, including the substantial increase in provision and how local jobs will be secured. • Raises concerns that Ashdown Business Park is not a sustainable location for further expansion due to poor public transport connectivity, limited accessibility and potential environmental constraints, including PFAS-related issues. • Highlights the need for better integration of employment sites with nearby communities	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

through sustainable transport links, and expresses concern that employment development concentrated along the A22 and A27 corridors could increase car dependency and congestion.		
Heathfield and Waldron Parish Council • Supported Policy SS5 in principle but requested that the policy reflect the increasing trend towards homeworking.	• Support noted. Homeworking and flexible working trends are relevant to the type and location of employment floorspace required.	No change required.
Mayfield and Five Ashes Parish Council • Supported Policy SS5 and considered that sufficient employment space is important to avoid becoming a dormitory/commuting area and to maximise local employment opportunities across the district.	• Support noted. The policy seeks to support a balanced distribution of employment opportunities across the district.	No change required.
Arlington Parish Council • Highlighted teleworking and freelance work, particularly among younger people, and requested suitable workspaces in residential areas.	• Comments noted. The Council recognises the importance of flexible, small-scale and locally accessible workspace.	No change required.
Rotherfield Parish Council • Supported Policy SS5 and agreed with the proposed policy approach.	• Support noted.	No change required.
Wadhurst Parish Council • Supported Policy SS5, stating that sufficient employment space is important to avoid Wealden becoming more of a	• Support noted. The Council recognises the importance of planning positively for local employment opportunities alongside housing growth.	No change required.

dormitory/commuting area and to maximise employment opportunities across the district.		
Warbleton Parish Council • Supported Policy SS5 and agreed with the proposed approach.	• Support noted.	No change required.
Horam Parish Council • Noted that the scale of employment growth depends partly on housing growth. • Notes that the location of floorspace will affect vehicle movements. • Requested adequate parking, public transport links and highway capacity.	• Comments noted. Some of these matters are relevant to site allocations and planning applications. Plan should be read as a whole.	No change required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Grassroots Planning Ltd • Supports the increased employment provision compared with the 2024 draft plan and agrees that the updated Employment and Economic Study provides a stronger evidence base demonstrating a need for significant employment growth. • Considers Policy SS5 still under-provides employment floorspace, arguing it should meet the full identified need of 194,400 sqm rather than the proposed 159,530 sqm. • Emphasises that employment provision should reflect the geography of demand, particularly the need for additional	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

employment land in the north of Wealden around Uckfield, Crowborough and the A22 corridor. • Supports the inclusion of larger mixed-use strategic developments, particularly consideration of the option site Oakleigh Garden Community (OGC), as a means of delivering employment land, homes, infrastructure and local jobs in an integrated and sustainable manner.		
Dowsett Mayhew Planning Partnership / AM Work Space Limited • Supports the increase in employment provision compared with the 2024 draft plan but argues Policy SS5 still significantly under-provides against the identified need of 194,400 sqm and should be amended to meet the full requirement. • States that failing to allocate sufficient employment land is inconsistent with the evidence base and national planning policy, and could constrain economic growth, business expansion and efforts to reduce out-commuting. • Emphasises that employment growth should be distributed to reflect market demand, highlighting evidence of a particular need for additional employment land in north Wealden around Uckfield, Crowborough and the A22 corridor.	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

• Supports the expansion of existing strategic employment sites, particularly Ashdown Business Park, and requests that Policy SS5 provide stronger support for additional employment allocations and extensions to existing employment areas.		
BL Trading Limited • The representation argued that Policy SS5 under-provided employment floorspace, as the proposed minimum of 159,530 sqm fell below the Council's identified residual employment need of 167,290 sqm and did not fully reflect delivery uncertainties. • It was suggested that SS5 should increase its minimum employment provision to at least meet, and preferably exceed, the residual need in order to be positively prepared, sound and provide flexibility in the market. • The respondent emphasised the importance of maintaining a range of employment sites and building types to provide businesses with choice and accommodate different operational requirements, including future growth and churn within the market. • Additional employment allocations, including sites such as Swallows North, were promoted as suitable and available opportunities to help meet employment needs in full and provide contingency	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

should committed schemes not come forward as expected.		
Framptons / Formula Land (Polegate) Limited • The representation noted that the Employment and Economic Study (2026) identified a total employment floorspace requirement of 194,400 sqm to 2042, comprising 16,100 sqm of office space and 178,900 sqm of industrial/warehouse space. • It argued that Policy SS5's target of at least 159,530 sqm fell below the evidence-based requirement and therefore did not fully meet identified employment needs. • Support was expressed for the Council's acknowledgement that additional employment sites and allocations would be considered before Regulation 19 to better address employment requirements. • The representation emphasised that meeting the full recommended employment floorspace requirement was necessary to support business investment, economic growth and productivity, in line with paragraph 85 of the NPPF.	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.
Stantec UK Limited / Cochrane Strategic Development Limited • The respondent supported Policy SS5 and the allocation of employment floorspace, including the strategic employment	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

allocation at Knights Farm West, Hailsham, for 40,000 sqm of employment floorspace. • It was considered that the employment allocation at Knights Farm, alongside the proposed North West Hailsham development, would create a sustainable mixed-use community by linking new homes, employment opportunities and leisure facilities. • The representation highlighted that North West Hailsham would improve connectivity through new walking and cycling routes along the A22 and potential new public transport links to employment areas. • No amendments to Policies SS5 were sought, as the respondent considered the proposed approach to employment provision and allocations to be appropriate.		
High Cross Investments (2023) Ltd • Supported the aims of Policy SS5 and agreed that delivering sufficient employment floorspace was essential to a balanced and sustainable Local Plan, with no objection to the overall employment floorspace requirement or delivery mechanisms proposed. • Noted that while Land at High Cross Farm did not provide traditional strategic employment floorspace, it would generate significant and long-term employment opportunities in the Uckfield area.	• Support noted. The Council welcomes support for the objectives of Policy SS5 and acknowledged the contribution that employment-generating uses within the High Cross Farm proposal could have made towards local economic activity. The potential role of health, childcare, care and local retail uses in supporting sustainable communities and providing local employment opportunities had been considered through the site assessment and spatial strategy process. The contribution of mixed-use development to the delivery of employment opportunities had informed the	No direct change to SS5.

• Highlighted that the proposed GP surgery, childcare facility, retirement village and neighbourhood centre would create permanent jobs across healthcare, childcare, care, hospitality, retail and service sectors. • Considered that the employment-generating uses at Land at High Cross Farm aligned with the objectives of Policy SS5, supported the wider economic strategy, and should be given appropriate weight when assessing the site's suitability for allocation.	overall approach to employment provision within the Plan.	
The Nevill Estate • Supported the overall approach of Policy SS5, including the planned provision of employment floorspace, protection of existing employment sites, and support for economic development across both urban and rural areas. • Emphasised that economic growth should be distributed across the whole district, including designated landscapes, to provide local employment opportunities and reduce the need to travel. • Argued that employment growth and housing growth should be planned together through an integrated district-wide growth strategy, ensuring new communities have access to jobs, services and facilities. • Considered that employment growth was currently too concentrated in the south of	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

the district and identified opportunities for proportionate expansion at rural employment centres, such as Sham Farm and Estate Yard in Eridge, to support the rural economy in line with national policy.		
KLW • Supported the overall approach to delivering employment floorspace and economic growth through a mix of strategic employment sites, protection of existing employment areas, and support for smaller-scale rural employment opportunities. • Emphasised the need for employment growth across the whole district, including within designated landscapes, to provide local jobs and reduce the need for travel. • Argued that the employment strategy should be closely aligned with housing growth, with an integrated approach to ensure new and growing communities have access to employment, services and facilities. • Considered that employment growth was overly concentrated in the south of the district and supported proportionate expansion of rural employment sites, including those in Eridge, to strengthen the rural economy in accordance with national policy.	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.
Stratton Estates	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations	Policy SS5 and site allocations have been reviewed and updated.

• Supported the overall approach to delivering employment floorspace through a combination of strategic employment sites, protection of existing businesses, and support for smaller-scale rural employment development. • Considered that employment growth should be distributed across the whole district, including designated landscapes where appropriate, to provide local jobs and reduce travel demand. • Argued that employment and housing growth should be planned in an integrated manner to ensure new and expanding communities have access to jobs, services and facilities. • Raised concern that employment growth was overly focused in the south of the district and supported proportionate expansion of rural employment sites, particularly around Eridge, to strengthen the rural economy in line with national policy.	has been undertaken before Regulation 19 to meet employment needs.	
Community Project Ltd • Supported the approach to calculating need and focusing quality employment units along growth corridors, but considered the policy too high level and insufficiently linked to cultural industries and Creative Wealden objectives.	• Comments noted. The Council considers that the policy approach is sufficiently flexible to ensure appropriate cultural proposals can come forward. The plan should be read as a whole.	No specific changes to Policy SS5 required.

Hailsham Roadway Construction Co Ltd • Supported the policy in general terms but stated that provision should be higher, at or close to the identified need of 194,400 sqm.	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.
Peacock & Smith • No specific comments on identified need, but considered that the clear shortfall means the Council should review site allocations.	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.
Martin Grant Land • Noted that SS5 sets out a provisional employment floorspace figure • Supported continued exploration of all options to meet identified employment need before Regulation 19.	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.
Turley • Noted that SS5 sets out a provisional employment floorspace figure • Supported continued exploration of all options to meet identified employment need before Regulation 19.	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.
Knight Frank • Supported the objective of Policy SS5 to deliver at least 159,530 sqm of employment floorspace and recognised the substantial	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

residual employment need identified within the district. • Argued that Policy SS5 did not fully capitalise on opportunities in northern Wealden, particularly land adjacent to Royal Tunbridge Wells, which has strong economic and functional links with the area. • Considered that mixed-use, residential-led developments could incorporate flexible workspace, SME units and small-scale employment land, helping to reduce out-commuting, support business growth and promote sustainable communities. • Requested that Policy SS5 adopt a more flexible and place-based approach by explicitly recognising employment floorspace delivered as part of larger masterplanned developments, including land promoted by the Estate, to support economic growth and improve policy effectiveness.		
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
<u>Crowborough and District Chamber of Commerce</u> • Objected to Policy SS5 on the basis that it underprovides employment floorspace, identifying a shortfall of approximately 34,870 sqm compared to the employment need set out in Table 9.	• Support noted. The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs.	Policy SS5 and site allocations have been reviewed and updated.

• Noted that the proposed provision of at least 159,530 sqm was below the identified employment requirement of 194,400 sqm for the plan period. • Raised concerns regarding the uncertainty of delivery from existing employment commitments and proposed allocations referenced in Policy SS6. • Sought an increase in employment land provision, including additional deliverable site allocations, to meet the full identified employment need and provide flexibility should existing commitments or allocations fail to come forward.		
Conservators of Ashdown Forest • Stated that they have no position on Policy SS5 in relation to Ashdown Forest.	• Noted.	No change required.
Clarity Ecoworks • Suggested that strategic employment development should incorporate flexible floorspace capable of adapting between office, storage and accommodation uses over time. • Considered adaptable building design important to future-proof employment allocations and respond to changing market requirements. • Supported mixed-use and flexible development formats, including the	Noted. The Council considers that the approach is flexible. The Plan should be read as a whole.	No change required.

potential for upper-floor space to accommodate a range of uses as needs evolve.		
Dicker Residents Association • Supported Policy SS5 and agreed with the suggested policy approach.	Support noted.	No change required.
CPRE Sussex • Raised wider concerns about environmental constraints, sensitive landscapes and ecological impacts associated with development and related allocations.	• Comments noted. Environmental constraints and landscape impacts have been assessed through the site selection process, allocation policies and planning applications.	No direct change to SS5. Plan should be read as a whole.

Local Residents	WDC Response	Changes made to policy/chapter
Local residents - grouped summary • Mixed views were expressed, with some residents supporting additional employment floorspace in principle because it could provide local jobs and reduce commuting. • Several residents objected that the proposed 159,530 sqm of employment floorspace is excessive, not aligned with realistic housing delivery, or not supported by robust evidence. • Concerns were raised that employment growth may be concentrated in unsustainable locations, particularly rural	• The resulting shortfall has been recognised, and further assessment of potential employment sites and allocations has been undertaken before Regulation 19 to meet employment needs. The IDP has been updated. Further evidence has been undertaken in terms of environmental considerations. The SA/SEA has been updated as well as the HRA.	Policy SS5 and site allocations have been reviewed and updated.

or greenfield sites, Ashdown Business Park, Laughton Park Farm and sites along the A22/A27 corridors. • Residents raised highway concerns, including congestion, HGV movements, inadequate rural roads, lack of public transport, poor bus services and insufficient parking. • Environmental concerns included loss of greenfield land, biodiversity impacts, ancient woodland, landscape harm, flood risk, water and wastewater constraints, climate change emissions and impacts on Ashdown Forest and the High Weald National Landscape. • Some residents wanted a stronger brownfield-first or regeneration-first approach, with redevelopment of vacant premises, town centres and existing employment sites prioritised before new greenfield employment land. • Several comments requested better integration between housing and employment locations so that new residents can access local jobs, services and facilities without creating additional car dependency. • Some residents considered the policy should support small business space, flexible workspace, creative industries, artisan uses, homeworking and local rural		

employment rather than large industrial or warehouse sites. • Others queried whether new employment floorspace would provide jobs suitable for Wealden residents, whether jobs could be guaranteed, and whether wages would align with local housing affordability. • A small number of respondents made no comment, stated that the policy was not relevant to them, or did not feel able to comment due to lack of expertise or time.		

Policy SS6: Strategic Employment Allocations

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 431	**Support:** 27	**Neutral:** 62	**Object:** 342

Policy Ref: SS6 – Strategic Employment Allocations		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Ashdown Business Park extension would require junction improvements at Michael Way roundabout and approach lanes from the A22.	• Comments noted. Transport impacts and access requirements have been through the site assessment, infrastructure planning and through further transport evidence developed in partnership with ESCC.	Policy SS6, site allocations and relevant infrastructure policies have been reviewed and updated.

• Access to land adjacent to the A22 would need modelling and safety consideration due to proximity to Batts Bridge roundabout. • Other matters include A22 junction form and non-motorised user access across the A22/A272.		
National Highways • Plan should provide employment floorspace in sustainable locations and consider cumulative impacts with neighbouring authorities. • National Highways should be consulted on employment allocations before future consultation to assess potential Strategic Road Network impacts.	• Comments noted. Ongoing engagement with National Highways informs the assessment of strategic transport impacts and any necessary mitigation.	Policy SS6, site allocations and relevant infrastructure policies have been reviewed and updated.
Natural England • Supports draft Policy SS6. • Concerned HA16 contains nationally important priority habitat and requires clarity on avoidance and mitigation. • Impacts on adjacent ancient woodland must be avoided. • HEL4 borders priority habitat and impacts must be avoided and fully mitigated.	• Support noted. Habitat, ancient woodland and ecological constraints have been considered through site assessment and reflected in policy updates. Plan is read as a whole.	No specific change to this policy identified.
South Downs National Park Authority • Supports draft Policy SS6. • For the non-proposed allocation south of Hailsham, careful consideration should be	• Support noted. Design, landscape and lighting matters will be considered through site-specific assessment. Also noted that the plan should be read as a whole.	No specific change to this policy identified.

given to massing, roof design and lighting to minimise impacts.		
Southern Water • Southern Water infrastructure crosses HEL4 and may require a 6 metre or wider easement depending on pipe size and depth. • Easement should be clear of buildings and substantial tree planting, or diversion may be required. • Suggested wording requires layout to ensure future access to sewerage infrastructure for maintenance and upsizing. • HA16 and HEL4 may require local network reinforcement, with occupation phased to align with delivery.	• Comments noted.	No specific change to this policy identified.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
No comments received.	n/a	n/a
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Arlington Parish Council • Supports Policy SS6 and the overall amount of proposed floorspace. • Concerned about increased heavy traffic through the parish and requests mitigation.	• Support noted and traffic concerns noted. Plan is read as a whole.	No specific change to this policy identified.
Chiddingly Parish Council • Supports Policy SS6.	• Comments noted. Plan should be read as a whole.	No specific change to this policy identified. .

• Major development should be co-located with population centres. • Concerned about impacts on the road network and surrounding villages. • No A22 development should take place without improvements.		
East Hoathly with Halland Parish Council • Supports Policy SS6. • Further business-space development should be explored along the A22 corridor north of Boship Roundabout, subject to highway improvements.	• Support noted. Additional opportunities and highway constraints have neem considered through the wider site selection and evidence process.	No specific change to this policy identified.
Frant Parish Council • Objects to Policy SS6. • Existing land allocations are sufficient. • East-west routes should be considered alongside the A26/A22/A27 corridor. • Northern Wealden is ill-equipped for more employment land without harm to key characteristics. • Additional employment would be better in the south, closer to the Strategic Road Network and urban amenities.	• Objection noted. The distribution and scale of employment allocations have been reviewed against the employment evidence, infrastructure capacity, environmental constraints and sustainability objectives.	No specific change to this policy identified. .
Heathfield & Waldron Parish Council • Supports Policy SS6. • Employment opportunities for industry and warehouses are important. • Policies should resist retail and other town-centre uses in such locations.	• Support noted. The policy approach distinguishes employment uses from town-centre uses where necessary.	No specific change to this policy identified.

Hellingly Parish Council • Considers the policy fails to include land at Cophall Roundabout. • Concerned about the impact of Knights Farm allocation on the road network.	• Comments noted. Site inclusion and road impacts are considered through site selection, transport evidence and deliverability assessment.	No specific change to this policy identified.
Herstmonceux Parish Council • Concerned that traffic generated by employment space will further impact the road network.	• Traffic concerns noted. Transport impacts are considered through updated transport modelling supporting the Regulation 19 version of the Plan.	No specific change to this policy identified.
Horam Parish Council • Objects to Policy SS6. • Questions allocations along the A22. • If employment is directed to the A22, major development should also be directed there to minimise commuting and support 20-minute neighbourhood principles.	• Objection noted. The spatial relationship between homes, jobs and services are considered through the overall strategy and sustainability appraisal.	A number of evidence based documents have been updated and relevant policy updates have been made.
Isfield Parish Council • Objects to Policy SS6. • Policy should be kept under review to determine the type of need. • Past Take Up model may not reflect future trends. • Office and retail space should be in town centres, with industrial space close to the Strategic Road Network. • Additional substantial employment should be directed to the north.	• Objection noted. Employment need, methodology, distribution and use-type locational requirements have been reviewed through the evidence base and policy refinement.	A number of evidence based documents have been updated and relevant policy updates have been made.

• Concerned about traffic and villages.		
Maresfield Parish Council • Objects to Policy SS6. • Existing allocations are sufficient and the north is ill-equipped for further employment land. • Concerned about road network, environment and unsustainable locations. • Contests the Labour Supply model and considers further employment would be better in the south.	• Objection noted. Employment need, methodology, distribution and use-type locational requirements have been reviewed through the evidence base and policy refinement.	A number of evidence based documents have been updated and relevant policy updates have been made.
Mayfield and Five Ashes Parish Council • Sufficient employment space must be provided. • Each area of the district should maximise employment opportunities.	• Objection noted. Employment need, methodology, distribution and use-type locational requirements have been reviewed through the evidence base and policy refinement.	A number of evidence based documents have been updated and relevant policy updates have been made.
Polegate Town Council • Broadly supports Policy SS6. • Allocation alone does not guarantee delivery and support for companies should be considered. • Sufficient employee parking is needed. • Concerned about A22 road impacts and congestion.	• Support and concerns noted. Delivery, parking and transport impacts will be considered through other policy requirements elsewhere in the Plan. The Plan should be considered as a whole.	No specific changes required.
Rotherfield Parish Council • Supports Policy SS6.	• Support noted.	No change required.
Withyham Parish Council	• Support noted.	No change required.

• Supports Policy SS6.		
Uckfield Town Council • Objects to Policy SS6. • Considers allocations are limited and lack provision in the northern part of the district where accessibility and connectivity are better.	• Objection noted. The distribution of employment land has been reviewed against connectivity, accessibility and employment land evidence.	A number of evidence based documents have been updated and relevant policy updates have been made.
Westham Parish Council • Distinction should be made between retail space and light industrial premises. • Concerned about overprovision of tourism.	• Comments noted. Employment use distinctions and wider land-use implications are considered through relevant policy wording and supporting text. The Plan should be read as a whole.	No change required.

Other Consultee Bodies	WDC Response	Changes made to policy/chapter
AM Work Space Limited • Objects to Policy SS6. • Further allocations should be included to meet district need and unmet need from Eastbourne Borough. • Additional allocation should be considered south and east of Ashdown Business Park.	• Objection noted. Employment land supply, unmet need and spatial distribution have been reviewed through the evidence base.	A number of evidence based documents have been updated and relevant policy updates have been made.
Westcott Leach Limited • Objects to Policy SS6.	• Objection noted. Employment land supply, unmet need and spatial distribution have been reviewed through the evidence base.	A number of evidence based documents have been updated

• Further allocations should be included to meet district need and unmet need from Eastbourne Borough. • Additional allocation should be considered south and east of Ashdown Business Park.		and relevant policy updates have been made.
Bryan Thomas Limited • Objects to Policy SS6. • A22 corridor should be reinforced, including land at Nash Street and the A22. • Raises shortfall, reliance on a single operator and need to address Eastbourne unmet need.	• Objection noted. Employment land supply, unmet need and spatial distribution have been reviewed through the evidence base.	A number of evidence based documents have been updated and relevant policy updates have been made.
Conservators of Ashdown Forest • Concerned about impact of proposed employment allocation west of Uckfield on Ashdown Forest.	• Comments noted. Potential impacts on Ashdown Forest are considered through ecological, transport and environmental assessment.	A number of evidence based documents have been updated and relevant policy updates have been made.
CPRE Sussex • Objects to Policy SS6. • Further allocations should be withheld until existing Core Strategy allocation and recent commitments are delivered. • Future need should be considered at the next plan review.	• Objection noted. The Council have reviewed delivery evidence, commitments and future need as part of the Local Plan evidence base. The need identified has been proactively provided for through relevant allocations.	A number of evidence based documents have been updated and relevant policy updates have been made.
The Working Group Against Over Development • Objects to Policy SS6.	• Objection noted. The Council have reviewed delivery evidence, commitments and future need as part of the Local Plan evidence base. The need identified has	A number of evidence based documents have been updated

• Further allocations should be withheld until existing Core Strategy allocation and recent commitments are delivered. • Future need should be considered at the next plan review.	been proactively provided for through relevant allocations.	and relevant policy updates have been made.
Crowborough and District Chamber of Commerce • Objects to Policy SS6. • Considers insufficient land has been allocated to meet need. • Seeks additional strategic allocations.	• Objection noted. Employment land supply, unmet need and spatial distribution have been reviewed through the evidence base.	A number of evidence based documents have been updated and relevant policy updates have been made.
Dicker Residents Association • Supports Policy SS6.	• Support noted.	No change required.
Grosvenor Property UK Limited • Supports Policy SS6.	• Support noted.	No change required.
Forest Row Local CBS Limited • Considers sufficient business land is provided and additional land is not needed. • Space should be maximised through smarter building design. • Locations near good roads are essential. • Development should be directed to large towns around Wealden.	• Comments noted. The Council has considered efficient land use, location, accessibility and regional context through the employment strategy.	No specific change made in response to this comment.
Formula Land (Polegate Limited) • Objects to Policy SS6.	• Objection noted. Employment land supply, unmet need and spatial distribution have been reviewed through the evidence base.	A number of evidence based documents have been updated

• Further allocations are needed to address the identified shortfall. • Opportunities exist to meet Wealden and neighbouring authority need. • A large allocation in the south would be appropriate.		and relevant policy updates have been made.
Grassroots Planning • Policy should refer to employment floorspace delivery as part of Oakleigh Garden Community.	• Comment noted. Employment land allocations have been reviewed and updated.	No specific change made in response to this comment.
Hertfordshire Holdings • Supports strategic allocations but says need, including neighbouring authority unmet need, should be met in full. • Infrastructure prerequisites should be clear, including timing and implementation implications. • Seeks more detail on accessibility by different travel modes at Knights Farm West.	• Support and concerns noted. Need, infrastructure delivery and accessibility have been reviewed through evidence and site-specific requirements.	A number of evidence based documents have been updated and relevant policy updates have been made.
Hop Farm Real Estate Limited • Objects to Policy SS6. • Higher dwelling need requires a corresponding uplift in employment floorspace at strategic sites.	• Objection noted. Housing growth and employment floorspace requirements have been considered together through updated evidence.	A number of evidence based documents have been updated and relevant policy updates have been made.
Nevill Estate Company • Objects to Policy SS6.	• Comment noted. Employment land allocations have been reviewed and updated.	No specific change made in response to this comment.

• Concerned about lack of strategic employment allocation in the north. • Strategy is skewed towards the south and may increase out-commuting. • Northern locations benefit from better transport connections.		
SE Marts Ltd • Objects to Policy SS6. • The cattle market should be recognised as an important resource supporting specialist employment and should be supported by allocations and policy.	• Objection noted. Wider employment uses are supported through employment and rural economy policies.	No specific change made in response to this comment.
Trafalgar Group Limited • Objects to Policy SS6. • Further allocation is required to meet current and future need. • Policy lacks incentives to upgrade or regenerate unsuitable employment space. • Old Swan Lane site should be allocated.	• Objection noted. Employment land allocations have been reviewed and updated.	No specific change made in response to this comment. Sites have been assessed as set out in the evidence base.
Uckfield Chamber of Commerce • Supports Policy SS6 and further floorspace for B2 and B8 uses. • Objects to further housing west of Uckfield, but considers land could accommodate industrial space. • Need to reflect changes in working practices.	• Objection noted. Employment land supply, unmet need and spatial distribution have been reviewed through the evidence base.	A number of evidence based documents have been updated and relevant policy updates have been made.

Village Concerns • Concerned about A22 impacts, congestion, traffic diversion through neighbouring villages and road network capacity. • Policy should not be implemented until infrastructure is delivered.	• Comments noted. Infrastructure capacity, phasing and mitigation is considered through transport evidence and policy implementation.	A number of evidence based documents have been updated and relevant policy updates have been made.
Wealden Food Partnership • Objects to Policy SS6. • Concerned about loss of agricultural land. • Soil grading should be considered with greater nuance.	• Objection noted. Agricultural land, soil quality and site selection implications have been considered through the evidence base.	A number of evidence based documents have been updated and relevant policy updates have been made. .
Willingdon Residents' Association • Considers no employment space should be provided along the A2270. • Concerned about traffic impacts.	• Comments noted. Traffic impacts and site suitability have considered through transport evidence and site assessment.	No specific change made in response to this comment.

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents • Many residents object to Policy SS6, with concerns that sufficient employment land is already provided and further allocations are unnecessary. • Repeated concerns about A22, A27 and A272 capacity, traffic congestion, village rat-	• Comments noted. The Council has considered the scale and distribution of employment land through the employment evidence, site selection process, transport evidence, environmental assessment and sustainability appraisal. Site-specific matters including highways, ecology, landscape, agricultural land, flood risk,	A number of evidence based documents have been updated and relevant policy updates have been made.

running, road safety and the need for infrastructure before development. • Frequent concerns about locating employment growth in rural parts of Wealden, particularly Uckfield, Maresfield and the northern district, due to landscape, biodiversity, Ashdown Forest, agricultural land and rural character impacts. • Several comments argue that employment should be directed towards larger towns, the coast or southern parts of the district with better transport links, services and access to the Strategic Road Network. • Some residents support Policy SS6, including further employment allocations, but request careful review, highway improvements, public transport, active travel, green infrastructure, renewable energy and flood-risk sensitive design. • Other points include maximising existing space through smarter or denser design, recognising changes in working practices, providing office hubs, supporting mixed use development, and protecting farmland and greenfield sites.	public transport, active travel and design have been considered through allocation wording and planning application requirements where relevant.	

Focused Local Plan Consultation

Total: 252	**Support:** 22	**Neutral:** 48	**Object:** 182

Question 6a: Policy SS6 – Strategic Employment Allocations		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
National Highways • Noted that planned employment provision and commitments (159,530 sqm) fell below the identified employment need (194,400 sqm), with continuing assessment of additional employment sites and allocations required. • Raised concern that Policy SS6 did not explicitly require employment allocations to be located in sustainable locations, or locations capable of being made sustainable, in line with National Highways Circular 01/2022. • Recommended that Policy SS6 include a clear commitment to directing employment development to sustainable locations to support sustainable travel patterns. • Sought a policy requirement for Transport Assessments on employment sites likely to impact the Strategic Road Network, ensuring that the scale and distribution of	• Comments noted. Other SS policies set out that development should be located in sustainable locations and does not need to be repeated here as the plan should be read as a whole. • Further transport work has been undertaken in consultation with NH on potential impacts on the Strategic Road Network to support he regulation 19 Plan. The requirement for appropriate transport assessment and mitigation had also been reflected through the allocation framework and supporting evidence to ensure that transport impacts had been properly understood and addressed.	A number of evidence based documents have been updated and relevant policy updates have been made.

growth is supported by appropriate transport evidence.		
Environment Agency • Raised concerns that several strategic employment allocations (EMP1-EMP4) and some housing allocations may be affected by historic land contamination, and recommended that site-specific policies reference the need for land quality assessments and, where necessary, remediation. • Suggested that supporting text should clarify that future employment sites with potential contamination risks, including possible PFAS residues, would require early and proportionate land quality investigations if promoted through future plan-making. • Emphasised the need for remediation strategies where contamination is identified to protect human health, controlled waters and sensitive environments, particularly within hydrological catchments such as the Pevensey Levels SAC/Ramsar. • Encouraged early pre-application engagement with the Council and Environment Agency to ensure contamination and land quality issues are addressed consistently and effectively across employment and housing allocations.	• Comments noted. The Council recognises the need for proportionate investigation where risks had been potentially identified. These matters had informed the development of site-specific requirements and supporting text for strategic employment allocations.	Site specific wording updated as necessary.

Neighbouring/Other Local Authorities	WDC Response	Changes made to policy/chapter
Tunbridge Wells Borough Council • Acknowledged that Wealden will continue to consider employment sites and draft allocations before the Regulation 19 Local Plan and will comment further at that stage.	• Comments noted.	No specific policy change.
Mid Sussex District Council • Noted that there remained a residual employment floorspace requirement of 167,290 sqm, comprising 16,100 sqm of office space and 151,190 sqm of industrial and warehouse space. • Acknowledged the Council's recognition of the outstanding employment need and the need to plan for additional employment provision. • Welcomed the Council's commitment to continue refining employment need figures as new evidence and information becomes available.	• Comments noted. Employment requirements, site capacity and deliverability has been further assessed and the outcomes of that work have informed the scale and distribution of strategic employment allocations and the overall employment land strategy within Policy SS6.	A number of evidence based documents have been updated and relevant policy updates have been made.
Rother District Council • Noted that Wealden had identified a shortfall of approximately 34,870 sqm of employment floorspace and was exploring whether neighbouring authorities could assist in accommodating unmet employment needs.	• Comments noted.	No specific policy change.

• Explained that Rother District Council's evidence identified a requirement for 74,189 sqm of employment floorspace and that the emerging Rother Local Plan sought to accommodate this need in full. • Stated that Rother District Council could not currently confirm whether it would have any surplus employment land capacity available to assist Wealden, as its employment needs evidence was due to be updated. • Highlighted that any future surplus employment capacity in Rother would first need to be considered against unmet employment needs within the Hastings and Rother Functional Economic Market Area before supporting unmet need from Wealden, with ongoing engagement between the authorities proposed.		
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Fletching Parish Council • Objected to Policy SS6 on the basis that it relied on the employment floorspace requirement set out in Policy SS5, which was considered unjustified and therefore unsound. • Argued that the stated need for 194,400 sqm of employment floorspace (16,100 sqm offices and 178,300 sqm industrial/warehouse) was not adequately evidenced and should be reconsidered.	• Objections noted. The Council has updated its employment floorspace requirement evidence underpinning Policy SS5 and SS6. The employment evidence base, including the scale of identified need, the relationship between office and industrial floorspace requirements, and the role of strategic allocations, have been reviewed and tested through the plan-making process and Sustainability Appraisal. The implications of alternative spatial options and the appropriate distribution of employment uses	A number of evidence based documents have been updated and relevant policy updates have been made.

• Highlighted Sustainability Appraisal findings that Spatial Options 3 and 4 would substantially exceed identified employment needs, by 135% and 163% respectively. • Contended that strategic employment allocations should primarily address industrial and warehouse needs, as office development was expected to be accommodated within town centres rather than out-of-centre strategic employment sites.	have also been considered. These assessments have informed the scale, location and justification of the proposed strategic employment allocations.	
Mayfield and Five Ashes Parish Council • Supported Policy SS6 and emphasised the importance of providing sufficient employment space so that the district does not become more reliant on commuting.	• Support noted. The Local Plan will continue to seek an appropriate balance between employment provision, sustainability and infrastructure capacity.	No action required.
Warbleton Parish Council • Supported Policy SS6.	• Support noted.	No action required.
Heathfield and Waldron Parish Council • Supported Policy SS6 in principle, subject to strategic allocations being delivered with the necessary associated infrastructure at the time of construction.	• Support and infrastructure concerns noted. Infrastructure requirements are considered through site-specific policies and the Infrastructure Delivery Plan.	A number of evidence based documents have been updated and relevant policy updates have been made.
Rotherfield Parish Council • Supported Policy SS6.	• Support noted.	No action required.
Little Horsted Parish Meeting	• Objections noted. The Council has updated its employment floorspace requirement	A number of evidence based documents have been updated and

• Considered Policy SS6 to be unsound because it relied on an inflated employment land requirement derived from Policy SS5, resulting in an excessive allocation of employment land and floorspace beyond evidenced need. • Objected to the proposed expansion of Ashdown Business Park (OEMP4), arguing that there was no robust evidence of demand, that growth forecasts were uncertain, and that market justification for large-scale employment development in this location was lacking. • Raised concerns that Ashdown Business Park was an unsustainable location due to poor connectivity to the Strategic Road Network, limited public transport access, congestion on local roads, and weak links to labour markets and economic clusters. • Considered OEMP4 to pose significant environmental and deliverability risks, including potential impacts on the High Weald National Landscape and Ashdown Forest, alongside concerns regarding commercial viability, infrastructure constraints, PFAS contamination, and the risk of over-allocation leading to inappropriate future uses.	evidence underpinning Policy SS5 and SS6. The employment evidence base, including the scale of identified need, the relationship between office and industrial floorspace requirements, and the role of strategic allocations, have been reviewed and tested through the plan-making process and Sustainability Appraisal. The implications of alternative spatial options and the appropriate distribution of employment uses have also been considered. These assessments have informed the scale, location and justification of the proposed strategic employment allocations.	relevant policy updates have been made.
<u>Wadhurst Parish Council</u> • Supported Policy SS6 and stated that sufficient employment space is important	• Support noted. The Local Plan will continue to seek employment provision that supports local economic needs and sustainable travel patterns.	No action required.

to reduce dormitory/commuting patterns and maximise employment opportunities across the district.		
Horam Parish Council • Supported the strategic employment allocations in Hailsham, Uckfield and on the edge of Eastbourne, considering them consistent with the overall spatial strategy. • Objected to the potential allocation of Site OEMP2 (Land at Laughton Park Farm, East Hoathly), arguing that its proposed scale of around 30,000sqm would be poorly related to the spatial strategy and would direct significant employment development into the countryside. • Raised concerns that OEMP2 would contribute to the erosion of the rural character of the Low Weald and undermine the distinction between rural areas and the district's main towns. • Considered that, when combined with other proposed large-scale development sites in the Low Weald, the allocation would have cumulative impacts that would substantially detract from and potentially overwhelm the area's rural character.	• Comments noted. The Council has updated its employment floorspace requirement evidence underpinning Policy SS5 and SS6. The employment evidence base, including the scale of identified need, the relationship between office and industrial floorspace requirements, and the role of strategic allocations, have been reviewed and tested through the plan-making process and Sustainability Appraisal. Landscape evidence has also been updated to support the allocations set out in the Regulation 19 Plan.	A number of evidence based documents have been updated and relevant policy updates have been made.
Isfield Parish Council • Objected to Policy SS6 on the basis that it relied on an inflated employment land requirement from Policy SS5, leading to an	• Comments noted. The justification for strategic employment allocations, including Ashdown Business Park, have been assessed through the employment evidence base and site-selection process, having regard to	A number of evidence based documents have been updated and relevant policy updates have been made.

excessive allocation of employment land and floorspace beyond evidenced need. • Supported strategic employment allocations in the south of the district near the A27 and Eastbourne, but opposed any further strategic allocation at Maresfield, particularly the expansion of Ashdown Business Park. • Argued that the proposed expansion of Ashdown Business Park was not supported by robust evidence of need and would result in environmental harm due to its proximity to the High Weald National Landscape. • Considered the Maresfield allocation to be unjustified and inconsistent with a sustainable and evidence-led employment strategy.	deliverability, transport impacts and environmental constraints. The relationship between employment growth, housing delivery and local economic conditions had also been considered. These assessments inform the scale, distribution and location of employment allocations within Policy SS6.	
Uckfield Town Council • Objected to the potential sites and considered the scale of development too large, stating that it does not balance with the environmental needs of the town area.	• Comments noted. The environmental, infrastructure and town-wide impacts of potential employment allocations have been assessed further.	A number of evidence based documents have been updated and relevant policy updates have been made.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Cochrane Strategic Development Limited • Supported Policy SS6, including the allocation of Knights Farm West, Hailsham, for 40,000 sqm of employment floorspace, and considered no changes to the policy necessary.	• Comments noted. The relationship between employment growth, housing delivery and local economic conditions had also been considered. These assessments inform the scale, distribution and location of employment allocations within Policy SS6.	A number of evidence based documents have been updated and relevant policy updates have been made.

• Considered the Knights Farm employment allocation and proposed North West Hailsham development to provide a sustainable 20-minute neighbourhood, integrating homes, employment opportunities and community infrastructure. • Highlighted that new housing at North West Hailsham would support the proposed employment hub at Knights Farm, existing employment at Diplocks Way, and the approved sports hub at Knights Farm East. • Supported proposals to improve connectivity through new walking and cycling routes along the A22 and potential enhanced bus services linking new development with employment areas.		
High Cross Investments (2023) Ltd • Supported Policy SS6 and considered the allocation of strategic employment sites to be an appropriate response to the district's identified employment land needs. • Considered the policy to be consistent with national planning policy and based on a sound approach to economic development. • Welcomed the Council's commitment to protecting and enhancing existing strategic employment sites alongside the provision of new employment land.	• Support noted.	No action required.

AM Work Space Limited • Argued that Policy SS6 failed to allocate sufficient employment land to meet the district's identified employment needs, particularly in north Wealden, where evidence identified a specific requirement for additional employment provision around Uckfield and Crowborough. • Supported the allocation of a circa 60,000sqm extension to Ashdown Business Park (OEMP4), contending that it was better located to meet northern market demand and performed more favourably in the Sustainability Appraisal than the allocated Land North of Polegate site. • Maintained that the omission of Ashdown Business Park was based primarily on unresolved PFAS contamination concerns, but argued that available technical evidence indicated any risk was low, manageable and not a barrier to delivery. • Considered that failing to allocate Ashdown Business Park would leave an employment land shortfall, undermine the plan's ability to meet identified economic needs, and result in Policy SS6 being unsound because it was not positively prepared, justified, or consistent with national planning policy.	• Comments noted. The justification for strategic employment allocations, including Ashdown Business Park, have been assessed through the employment evidence base and site-selection process, having regard to deliverability, transport impacts and environmental constraints. The relationship between employment growth, housing delivery and local economic conditions had also been considered. These assessments inform the scale, distribution and location of employment allocations within Policy SS6.	A number of evidence based documents have been updated and relevant policy updates have been made.
Jessops Construction and Zunikh	• Comments noted. The justification for strategic employment allocations, including Ashdown Business Park, have been assessed	A number of evidence based documents have been updated and

• Identifies mapping and referencing errors with OEMP4. • Supports further employment development in the Oakwood Park/Ashdown Business Park area and seeks inclusion as an employment allocation. • Challenges the Council's assessment of landscape, transport, biodiversity, flood risk and contamination constraints affecting both sites. • Accepts that PFAS contamination requires investigation but considers risks can be appropriately assessed/mitigated. • Contends that the Council has underestimated the site's potential contribution to meeting employment land needs.	through the employment evidence base and site-selection process, having regard to deliverability, transport impacts and environmental constraints. These assessments inform the scale, distribution and location of employment allocations within Policy SS6. • Further consideration has been given to Oakwood Park but not included within the Regulation 19 Plan.	relevant policy updates have been made.
BL Trading Limited • Overall employment land provision in the Plan is inadequate. • Additional employment sites are needed and promotes Swallows North as a suitable, deliverable employment allocation.	• Objection noted. The Council has updated its employment floorspace requirement evidence underpinning Policy SS5 and SS6. All SHELAA sites have been reviewed and updated. Although the Swallows North site is not considered appropraite to include within the Regualtion 19 Plan.	No changes required.

Formula Land (Polegate) Limited • Employment provision falls short of identified need and should be increased. • Strongly supports allocation EMP1 Land at North Polegate A22. The site is strategically located on the A22/A27 corridor with good transport connectivity. • The site can deliver over 63,000 sqm of employment floorspace. • Cites the live planning application and lack of objections from the Local Highway Authority and National Highways as evidence of deliverability.	• Support noted. The Council has updated its employment floorspace requirement evidence underpinning Policy SS5 and SS6. The employment evidence base, including the scale of identified need, the relationship between office and industrial floorspace requirements, and the role of strategic allocations, have been reviewed and tested through the plan-making process and Sustainability Appraisal.	A number of evidence based documents have been updated and relevant policy updates have been made.
The Montacute Estate • Supported the principle of Policy SS6 and the need to allocate strategic employment land to help meet the district's identified employment floorspace requirement. • Considered Policy SS6 to be ineffective in its current form because it planned for less employment land than the identified need and focused too heavily on the A22 corridor. • Argued that the policy failed to recognise the strong economic relationship between northern Wealden and Royal Tunbridge Wells, which forms part of a wider functional economic market area. • Requested that SS6 be broadened to allow additional employment land allocations in the north of the district, including as part of	• Comments noted. The justification for strategic employment allocations, including Ashdown Business Park, have been assessed through the employment evidence base and site-selection process, having regard to deliverability, transport impacts and environmental constraints. The relationship between employment growth, housing delivery and local economic conditions had also been considered. These assessments inform the scale, distribution and location of employment allocations within Policy SS6.	A number of evidence based documents have been updated and relevant policy updates have been made.

a wider mixed-use masterplan, to support sustainable growth, reduce commuting and better reflect economic geography.		
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Newick Village Society • Objects to OEMP4 as unsustainable and unjustified employment allocation. Should be removed from the Plan. • Concerns over cumulative traffic impacts, with local roads (A22, A26 and A272) already congested. • The development would contribute to coalescence between Uckfield, Maresfield and nearby villages. • Considers the site car-dependent and inconsistent with climate change objectives. • Raises concerns regarding water supply, drainage, flooding and infrastructure capacity. • Highlights potential impacts on agricultural land, Ashdown Forest, ancient woodland and landscape character. • Identifies potential PFAS contamination as a significant environmental and viability risk.	• Comments noted. The justification for strategic employment allocations, including Ashdown Business Park, have been assessed through the employment evidence base and site-selection process, having regard to deliverability, transport impacts and environmental constraints. The relationship between employment growth, housing delivery and local economic conditions had also been considered. These assessments inform the scale, distribution and location of employment allocations within Policy SS6.	A number of evidence based documents have been updated and relevant policy updates have been made.
Piltdown Golf Club Ltd • Objection raised.	• Comments noted. The justification for strategic employment allocations, including Ashdown Business Park, have been assessed through the employment evidence base and site-selection process, having regard to	A number of evidence based documents have been updated and relevant policy updates have been made.

• Previous planning application refused on policy and sustainability concerns. Site should be removed from the Plan. • Has a number of constraints including lanndscape sensitivity, proximity to ancient woodland and priority habitats, impact on Pevensey Levels SAC/Ramsar site, flood risk and water-quality concerns, potential PFAS contamination. • The site is car dependent, will result in transport impacts on the SRN, highway capacity and safety concerns.	deliverability, transport impacts and environmental constraints. The relationship between employment growth, housing delivery and local economic conditions had also been considered. These assessments inform the scale, distribution and location of employment allocations within Policy SS6.	
Community Project Ltd / Laughton Lodge • Raised concern that the strategic sites provide little detail on the type of employment expected and requested a more balanced approach including live-work provision and flexible spaces to support local entrepreneurship.	• Comments noted. The policy now clarifies strategic allocations and the need for flexible employment space where appropriate.	A number of evidence based documents have been updated and relevant policy updates have been made.
Crowborough and District Chamber of Commerce • Supported Policy SS6 but considered that further site allocations are required to meet total employment need.	• Support and concern noted. The extent of residual need and potential further allocations have been made.	A number of evidence based documents have been updated and relevant policy updates have been made.
Clarity Ecoworks • Objects to Policy SS6 as concerned about need for road infrastructure improvements needed to be in place first.	• Objection noted. The IDP has been updated and relevant policy changes have been made, where necessary. Site are expected to provide infrastructure needed to support that development.	No immediate policy change.

The Woodland Trust • Objected to strategic employment allocations that include ancient woodland, stating that these irreplaceable habitats should be excluded from development sites in accordance with national policy and existing Council policy protections. • Requested that allocated sites be reviewed to remove ancient woodland areas and provide appropriate buffers to protect ancient woodland and maintain ecological connectivity. • Raised concerns about the impacts of development on ancient woodland, including pollution, encroachment, habitat fragmentation and disturbance during construction and operation. • Recommended a minimum 50-metre buffer to ancient woodland, specialist surveys for ancient and veteran trees, and the implementation of root protection measures where such trees are present.	• Comments noted. The site assessment process had considered the presence of irreplaceable habitats and the need to avoid or minimise adverse impacts in accordance with national policy. Potential effects on biodiversity, ecological networks and the wider natural environment had been assessed through the evidence base and Sustainability Appraisal. These considerations had informed the selection, refinement and development of strategic employment allocations and any associated mitigation requirements.	Relevant policy wording amendments made. Should be noted that the plan should be read as a whole.
Sussex Wildlife Trust • Raises previous concerns scale of impact of a development of this scale on the district's natural capital. • Any development needs robust safeguards to protect and enhance surrounding watercourses within the Western Ouse	• Comments noted. The site assessment process had considered the presence of irreplaceable habitats and the need to avoid or minimise adverse impacts in accordance with national policy. Potential effects on biodiversity, ecological networks and the wider natural environment had been assessed through the evidence base and Sustainability Appraisal. These	A number of evidence based documents have been updated and relevant policy updates have been made.

Streams and Ashdown Forest Biodiversity Opportunity Area. • Impacts on the Ashdown Forest SPA and SAC to be fully addressed. • The site should be included in the Plan.	considerations had informed the selection, refinement and development of strategic employment allocations and any associated mitigation requirements.	

Local Residents	WDC Response	Changes made to policy/chapter
Local residents raised the following main issues: • Many residents objected to Policy SS6 and the potential employment allocations, particularly OEMP4 Ashdown Business Park, OEMP1/OEMP2 at Laughton Park Farm, and employment growth around Uckfield, Hailsham, Polegate and rural Low Weald locations. • Concerns were raised that the scale of proposed employment floorspace is excessive, not justified by robust evidence, and relies too heavily on historic take-up or inflated employment need figures. • Residents considered several allocations to be poorly located, car-dependent and inconsistent with sustainable transport objectives, with limited public transport, walking and cycling options. • Significant concerns were raised about highway capacity, including pressure on the A22, A26, A27, A272, Boship Roundabout,	• Comments noted. The strategic employment allocations and potential sites have been assessed through the Local Plan evidence base, including employment need, site selection, transport, infrastructure, landscape, biodiversity, flood risk, contamination and deliverability evidence. The Local Plan should ensure that employment growth is located in sustainable places, supported by appropriate infrastructure and subject to robust site-specific mitigation where required.	Relevant policy wording amendments made. Should be noted that the plan should be read as a whole.

rural lanes, village roads and junction safety. • Residents objected to the loss of greenfield land, productive farmland, open countryside and rural character, with concerns about settlement coalescence and erosion of gaps between towns and villages. • Environmental concerns included impacts on Ashdown Forest, the High Weald National Landscape, South Downs views, Low Weald landscape character, ancient woodland, biodiversity, wildlife habitats and SSSI/European site sensitivities. • Flood risk, water supply, wastewater capacity, surface water runoff, drainage and sewage infrastructure were recurring concerns. • Several representations referred to possible PFAS or contamination risks, particularly around Ashdown Business Park and nearby fire training uses. • Some residents supported the principle of employment provision where it creates local jobs, reduces out-commuting and is located in sustainable places with sufficient infrastructure. • Residents also suggested that brownfield land, existing vacant premises, town centres, smaller flexible workspaces, live-work units and support for local businesses		

should be prioritised before new large-scale rural employment allocations.		

Policy SS7: Ensuring Comprehensive Development and Housing Delivery

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 151	**Support:** 56	**Neutral:** 27	**Object:** 68

Policy SS7 – Ensuring Comprehensive Development and Housing Delivery		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Network Rail • Supported Policy SS7. • Requested reference to assessing surface-water drainage impacts on nearby rail infrastructure.	Support was noted. Surface-water drainage impacts on railway infrastructure would be considered through site-specific evidence and the development management process, with consultation undertaken where relevant.	No change proposed. The matter was addressed through site-specific assessment and existing drainage and infrastructure requirements.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
Tunbridge Wells Borough Council • Supported Policy SS7.	Support was noted. The grammatical correction was noted. Early engagement with relevant stakeholders is supported and would assist comprehensive delivery.	The policy and supporting text have been generally revised and streamlined.

• Requested correction of "applicant" to "applicants" in criterion b). • Requested reference to early engagement with relevant stakeholders.		
Town/Parish Councils	**WDC Response**	**Proposed Changes to Policy**
Arlington Parish Council Supported Policy SS7.	Support noted.	No change proposed.
Frant Parish Council Supported Policy SS7.	Support noted.	No change proposed.
Isfield Parish Council Supported Policy SS7.	Support noted.	No change proposed.
Mayfield and Five Ashes Parish Council Supported Policy SS7.	Support noted.	No change proposed.
Maresfield Parish Council Supported Policy SS7.	Support noted.	No change proposed.
Rotherfield Parish Council Supported Policy SS7.	Support noted.	No change proposed.
Withyham Parish Council Supported Policy SS7.	Support noted.	No change proposed.
East Hoathly with Halland Parish Council • Requested a definition of affordable housing.	The request for clarity was noted. Affordable housing is defined through national policy and the Plan's affordable housing policies. Implementation,	No change proposed.

• Raised concerns about implementation, sustainability, community integration and the natural environment.	integration, sustainability and environmental effects would also be addressed through relevant strategic, site and development management policies.	
Heathfield & Waldron Parish Council • Supported Policy SS7. • Requested viability or other testing under criterion 1(c). • Requested clarification that shorter commencement periods under 1(d) should be justified by viability and marketing evidence.	Support noted. Any shorter commencement period would need to be reasonable, necessary and justified having regard to scheme scale, delivery evidence and viability. Criterion 1(c) would not displace proportionate viability assessment where relevant.	Clarify that shorter commencement periods would be applied case by case and supported by proportionate delivery, viability and marketing evidence where relevant. Revised criterion 2 of the policy now reflects this.
Horam Parish Council • Supported Policy SS7. • Requested criterion d) be amended to confirm that the Council would impose conditions requiring an earlier start.	Support noted. The policy already enables the Council to impose an earlier commencement period where justified; the wording would be reviewed to remove ambiguity.	Revised criterion 2 of the policy as identified above.
Ninfield Parish Council • Supported Policy SS7. • Requested greater policy specificity.	Support noted. The policy provides a strategic framework and would be applied alongside site-specific policies, masterplans and planning conditions.	No change proposed.
Polegate Town Council • Supported Policy SS7. • Requested genuinely affordable housing within masterplans.	Support noted. Affordable housing amount, tenure and mix would be secured through the Plan's housing policies, viability evidence and legal agreements.	No change proposed.

Uckfield Town Council • Supported Policy SS7. • Raised concern that criterion 1(c) could reduce affordable housing provision. • Requested conditions to retain the approved affordable housing ratio and mix.	Support and the concern were noted. Criterion 1(c) was not intended to permit unjustified erosion of affordable housing. Any change would require robust evidence and consideration against affordable housing policy and viability requirements.	No change proposed.
Westham Parish Council Raised concern about changes to proposals after planning permission.	Post-permission changes would be assessed through the planning process and would need to remain acceptable against the development plan and any secured obligations.	No change proposed.
Willingdon and Jevington Parish Council Raised concerns about land banking.	The concern is noted. Shorter commencement periods and delivery mechanisms were intended to support timely implementation, while decisions would remain subject to statutory tests and site circumstances.	No change proposed.
Site Promoters	**WDC Response**	**Proposed Changes to Policy**
Bellway Strategic • Argued that delays may arise from processes outside applicants' control. • Warned that rigid conditions could fail to reflect unforeseen circumstances and viability impacts. • Requested deletion or modification of the policy.	The concerns were noted. The policy will be applied proportionately and case by case. Commencement periods and delivery measures would reflect scheme scale, complexity, viability and matters demonstrably outside the applicant's control, while supporting timely delivery.	The policy and supporting text have been generally revised and streamlined. No other specific changes required.

Earlswood Homes Holdings Limited Raised the same concerns about matters outside applicants' control, viability and the need to delete or modify the policy.	The concerns were noted. The policy will be applied proportionately and case by case, reflecting scheme complexity, viability and matters demonstrably outside the applicant's control.	The policy and supporting text have been generally revised and streamlined.
Fernham Homes (Sussex) Limited Raised the same concerns about matters outside applicants' control, viability and the need to delete or modify the policy.	The concerns were noted. The policy will be applied proportionately and case by case, reflecting scheme complexity, viability and matters demonstrably outside the applicant's control.	The policy and supporting text have been generally revised and streamlined.
Fernham Homes Limited Raised the same concerns about matters outside applicants' control, viability and the need to delete or modify the policy.	The concerns were noted. The policy will be applied proportionately and case by case, reflecting scheme complexity, viability and matters demonstrably outside the applicant's control.	The policy and supporting text have been generally revised and streamlined.
Hempstead Farm Limited Raised the same concerns about matters outside applicants' control, viability and the need to delete or modify the policy.	The concerns were noted. The policy will be applied proportionately and case by case, reflecting scheme complexity, viability and matters demonstrably outside the applicant's control.	The policy and supporting text have been generally revised and streamlined.
James Fermor Raised the same concerns about matters outside applicants' control, viability and the need to delete or modify the policy.	The concerns were noted. The policy will be applied proportionately and case by case, reflecting scheme complexity, viability and matters demonstrably outside the applicant's control.	The policy and supporting text have been generally revised and streamlined.
Obsidian Strategic Asset Management Limited Raised the same concerns about matters outside applicants' control, viability and the need to delete or modify the policy.	The concerns were noted. The policy will be applied proportionately and case by case, reflecting scheme complexity, viability and matters demonstrably outside the applicant's control.	The policy and supporting text have been generally revised and streamlined.

Stonebond Properties (Sevenoaks) Limited & Akehurst Homes Limited Raised the same concerns about matters outside applicants' control, viability and the need to delete or modify the policy.	The concerns were noted. The policy will be applied proportionately and case by case, reflecting scheme complexity, viability and matters demonstrably outside the applicant's control.	The policy and supporting text have been generally revised and streamlined.
Tarn (Mornings Mill) Limited Raised the same concerns about matters outside applicants' control, viability and the need to delete or modify the policy.	The concerns were noted. The policy will be applied proportionately and case by case, reflecting scheme complexity, viability and matters demonstrably outside the applicant's control.	The policy and supporting text have been generally revised and streamlined.
B Yond Objected to Policy SS7, particularly criterion d).	The objection is noted. Criterion d) was intended to support timely delivery but required general revision as part of overall amendments and streamlining of the policy.	Revised criterion 2 of the policy as identified above.
Hop Farm Real Estate Limited Objected to Policy SS7, particularly criterion d).	The objection is noted. Criterion d) was intended to support timely delivery but required general revision as part of overall amendments and streamlining of the policy.	Revised criterion 2 of the policy as identified above.
Nevill Estates Company Objected to Policy SS7, particularly criterion d).	The objection is noted. Criterion d) was intended to support timely delivery but required general revision as part of overall amendments and streamlining of the policy.	Revised criterion 2 of the policy as identified above.
Reinar Properties Limited Objected to Policy SS7, particularly criterion d).	The objection is noted. Criterion d) was intended to support timely delivery but required general revision as part of overall amendments and streamlining of the policy.	Revised criterion 2 of the policy as identified above.

Vistry Group Objected to Policy SS7, particularly criterion d).	The objection is noted. Criterion d) was intended to support timely delivery but required general revision as part of overall amendments and streamlining of the policy.	Revised criterion 2 of the policy as identified above.	
Trafalgar Group Limited Objected to Policy SS7, particularly criterion d).	The objection is noted. Criterion d) was intended to support timely delivery but required general revision as part of overall amendments and streamlining of the policy.	Revised criterion 2 of the policy as identified above.	
Boakes Land Projects • Supported Policy SS7. • Requested clarity on criterion d) for outline permissions and a minimum two-year commencement period.	Support is noted. For outline permissions and larger schemes, commencement requirements would need to recognise reserved matters and phased delivery. A fixed minimum period was not appropriate in every case, but clearer guidance was required.	Revised criterion 2 of the policy as identified above.	Revised criterion 2 of the policy as identified above.
Catesby Strategic Land • Considered criterion d) unrealistic. • Requested clarity on the application types to which it would apply.	The concern is noted. Criterion d) required clearer scope and would be applied proportionately, especially for outline, phased and large-scale schemes.	Revised criterion 2 of the policy as identified above.	
Siefelle Limited • Considered criterion d) unrealistic. • Requested clarity on the application types to which it would apply.	The concern isnoted. Criterion d) required clearer scope and would be applied proportionately, especially for outline, phased and large-scale schemes.	Revised criterion 2 of the policy as identified above.	
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**	

CPRE Sussex Supported Policy SS7.	Support was noted.	No change proposed.
The Working Group Against Over Development Supported Policy SS7.	Support was noted.	No change proposed.
Dicker Residents Association • Supported Policy SS7. • Requested comprehensive development alongside goods and services provision rather than relying on developer withdrawal.	Support was noted. Comprehensive development required coordinated housing, infrastructure, facilities and services, secured through masterplanning, conditions and legal agreements where necessary.	No change proposed.
Forest Row Local CBS Limited Raised concern about the scale of proposed development affecting Forest Row.	The concern relates primarily to the scale and distribution of development rather than the detailed operation of Policy SS7. Site impacts would be considered through the spatial strategy, site policies and supporting evidence.	No change proposed.
Grosvenor Property UK Limited • Supported Policy SS7. • Considered criterion d) potentially impractical on larger sites.	Support noted. Criterion d) would be applied proportionately, with larger and phased schemes requiring commencement and delivery arrangements tailored to their scale and complexity.	Revised criterion 2 of the policy as identified above.
Hertfordshire Holdings Considered the policy to read as a statement of intent or guidance.	The concern is noted. The policy was intended to provide a clear development management basis for coordinated delivery, rather than operate only as guidance.	The policy and supporting text have been generally revised and streamlined.

Real Select Ltd • Supported Policy SS7. • Considered criterion d) likely to encourage technical starts rather than delivery.	Support noted. The concern about technical starts is recognised. The policy sought substantive delivery rather than token implementation and should distinguish commencement from meaningful progress.	The policy and supporting text have been generally revised and streamlined.
Village Concerns • Objected to Policy SS7. • Raised inconsistent community advice and site assessments. • Requested access to comprehensive, permanently funded bus and rail services as a critical assessment factor for major growth.	The objections are noted. Community engagement and consistent evidence are important to comprehensive development. Sustainable transport and public transport accessibility would be assessed through transport evidence, site selection and infrastructure planning, but permanent service funding could not be guaranteed solely through this policy.	No substantive change proposed. The policy and supporting text have been generally revised and streamlined.
Wates Development • Attributed delays in implementing permissions to the planning system and councils rather than developers. • Considered the policy unreasonable and unfair.	The concern is noted. Delays could arise from several parties and external processes. The policy was not intended to attribute all delay to developers and would be applied only where justified, reasonable and proportionate.	No substantive change proposed. The policy and supporting text have been generally revised and streamlined.
Willingdon Residents' Association Raised concerns about land banking and the release of further greenfield land.	The concern is noted. The policy sought timely delivery and effective use of existing permissions. Greenfield release was determined through the wider spatial strategy and evidence, not Policy SS7 alone.	No change proposed.

Local Residents	WDC Response	Proposed Changes to Policy
Local Residents • Support was expressed for Policy SS7, with calls for clearer design codes, early community engagement, stronger accountability and enforcement. • Concerns centred on land banking, technical starts, post-permission changes and whether shortened commencement periods were clear, proportionate or suitable for outline and large-scale schemes. • Respondents sought genuinely affordable housing, protection of the approved housing mix, smaller homes, and prioritisation of housing delivery according to need. • Infrastructure capacity, sustainable transport, access to bus and rail services, and timely supporting infrastructure were recurring concerns. • Environmental issues included greenfield loss, biodiversity, nature conservation, open-space delivery, landscape and ecological management, and impacts on the built and natural environment. • Some respondents considered that sustainability, community integration,	Support and objections are noted. The policy seeks coordinated and timely delivery through masterplanning, infrastructure provision and proportionate commencement requirements. Affordable housing, housing mix, environmental protection, sustainable transport and infrastructure capacity would be addressed through the wider policy framework, site-specific evidence, conditions and legal agreements. Concerns about technical starts, land banking and matters outside applicants' control justified clearer wording and case-by-case application.	No further changes are required to the policy or supporting text.

evidence quality and site-selection consistency required stronger safeguards. • Objections also sought stronger phasing, focus on existing housing stock and previously permitted development, and avoidance of development where infrastructure or environmental capacity was inadequate.		

Policy SS8: Responding to Climate Change

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 147	**Support:** 102	**Neutral:** 20	**Object:** 24

Policy SS8 – Responding to Climate Change		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Requested additional supporting text on the health impacts of climate change, including direct impacts from heat and extreme weather, indirect impacts through ecosystems and socioeconomic systems, and disproportionate effects on vulnerable groups. Suggested policy justification should explain how development addresses climate change effects on population health and reduces inequalities.	• Comments noted. The climate change chapter already seeks to address mitigation and adaptation.	No further action required.
National Highways • Welcomed the encouragement for broadband provision to enable home working and reduce travel demand. Also noted support for EV charging facilities in line with Circular 01/2022.	• Support noted.	No further action required.

Natural England • Supported the policy's inclusion of nature-based solutions, landscape-scale connectivity, habitat resilience, soil health and green infrastructure. Encouraged retrofit opportunities in existing settlements as well as new allocations.	• Support noted. The policy aligns with the Local Plan's wider approach to green infrastructure, biodiversity and climate resilience.	No further action required.
Network Rail • Requested reference to promoting first and last mile sustainable travel connections to public transport hubs, expanding on criterion 2(k).	• Comment noted.	Policy revised and updated in line with a number of points made across this topic.
Pevensey and Cuckmere Water Level Management Board • Considered that the policy covers expected climate adaptation issues. Suggested replacing "species migration" in relation to SuDS with "water quality", as this is more directly achievable through wetland SuDS.	• Comment noted. SuDS can deliver multiple benefits including flood storage, water quality, habitat and biodiversity outcomes.	Policy revised and updated in line with a number of points made across this topic
Southern Water • Supported the policy direction but recommended strengthening wording on flood risk, preserved drainage features, SuDS source control, rainwater reuse, green roofs, rain gardens, permeable paving and multi-functional SuDS to reduce surface water run-off and improve climate resilience.	• Comments noted. The policy already supports SuDS and there is a specific additional policy in relation to that in the Climate Change Chapter of the Local Pan	Policy revised and updated in line with a number of points made across this topic

Southern Water • Southern Water's infrastructure crosses the site. An easement width of 6 metres or more, depending on pipe size and depth, would be required.	• This issue has been considered in site assessment. The issue must be addressed further at planning application stage.	No further action required – allocation/yield takes account of this constraint
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tunbridge Wells Borough Council • Agreed with the policy.	• Support noted.	No further action required.
Eastbourne Borough Council • Supported the policy's focus on reducing vehicle use, avoiding car-dependent behaviours, improving walking, wheeling and cycling routes, and improving access to public transport and transport sharing schemes.	• Support noted. These matters are consistent with the policy's approach to climate mitigation and sustainable transport.	No further action required.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Withyham Parish Council and Isfield Parish Council • Agreed with the policy.	• Support noted.	No further action required.
Mayfield and Five Ashes Parish Council • Agreed in principle but requested sensible application so requirements do not detract from business development. Suggested annual targets for greenhouse gas reductions and EV charging increases.	• Comments noted. Monitoring indicators are considered through the monitoring framework.	Considered through monitoring framework rather than policy wording.
Heathfield and Waldron Parish Council	• Comments noted. The policy and climate change chapter address low carbon design, resource	No further action required

• Agreed with the policy but sought clearer criteria for achieving net zero, explicit reference to avoiding fossil fuels, reducing waste, and investigating new walking and cycling routes.	consumption and sustainable transport.	
Rotherfield Parish Council • The reference to EVs in Part 2(n) should be deleted and replaced by the words "sustainable or low carbon vehicles"; evidence is mounting that the overall energy component to manufacture and use EVs is not sustainable and that neither hybrid nor EVs meet the ranges quoted by manufactures	• Comments noted	Policy updated.
Laughton Parish Council • Rewording of the Policy required in part 2 to remove consideration and ensure that developers commit to the climate change adaptations	• Comments noted	Policy revised and updated in line with a number of points made across this topic
Polegate Town Council • Build the new reservoir before occupation to encourage developers to lobby SE Water and WDC. • The policy is aspirational, and WDC's power to require statutory authorities to deliver infrastructure before occupation should be considered. • In Polegate, developments are occupied before road improvements are delivered. The Environment Agency also does not always	• Comments noted. A number of the points raised are outside of the scope of what the Local Plan can achieve. The Policy approach safeguards land for the resevoir, and considered the required infrastructure needed to support developments in s a timely way.	No further action required

maintain flood-risk infrastructure due to funding constraints. • EVs remain unaffordable for many residents, while loss of local green space increases car trips to nature areas. Polegate and Willingdon have green space deficits, and developer contributions are often inadequate. • Many Polegate residents drive to Arlington Reservoir, Butts Lane, Eastbourne seafront and Abbotts Wood. The 20-minute neighbourhood aspiration is not being achieved in practice. • EV sales are declining, vehicles remain unaffordable for many residents, and charging infrastructure is insufficient		
Uckfield Town Council • Some policies appear to contradict climate change aims, particularly where allocated sites extend beyond existing development boundaries, increasing vehicle use. • Support the inclusion of measures in planning applications and reference to the Weald to Waves Nature Recovery Corridor in Policy SS8 2h). • Question whether 'nationally binding targets' are sufficiently robust if weakened in future. • Policy SS8 should reference Wealden's Climate Change Strategy and Action Plan, strengthen biodiversity measures, and reinforce 20-minute neighbourhoods that reduce unnecessary car journeys	• Comments noted. The Plan acknowledges that identified needs cannot be met in existing development boundaries so therefore amendments have been made to accommodate growth in a sustainable way across the district.	No further action required.

Horam Parish Council • Policy SS8 section 2g) should include not building on regenerating land where carbon is already sequestered	• Comments noted.	No further action required
Hailsham Town Council • Notes and supports the policy. • Supports the development of Design code district wide	• Comments noted, design elements are covered by the design policies in other sections of the Local Plan.	No further action required.
Ninfield Parish Council • Principle of policy accepted but implementation is questioned.	• Comments noted	No further action required.
Willingdon and Jevington Parish Council • Solar panels and electric car points should be provided with all the new affordable homes. This will help with climate change and costs	• Comments noted but practicality and viability considerations must also be considered.	No further action required.
Wartling Parish Council • General support for the policy	• Comments noted	No further action required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Hertfordshire Holdings, Tor & Co • Supported the intent to mitigate climate change but considered policies SS8, CC1 and CC3 too wordy, onerous, inflexible and inconsistent with national Building Regulation standards. Requested a simpler and more practical policy approach.	• Comments noted. The policy has been considered alongside national policy, Building Regulations and viability evidence.	Evidence updated and the policy revised and updated in line with a number of points made across this topic

Grosvenor Property UK Limited • Broadly supported the policy and stated that North West Hailsham could deliver net zero carbon development, high fabric standards, renewable energy, circular economy principles and sustainable travel.	• Support noted.	No further action required.
Esquire Developments on behalf of Tunbridge Wells Rugby Football Club • Objected that the policy is too complex, lengthy, onerous, unclear and potentially harmful to viability. Argued many requirements may not apply to all types or scales of development and should instead sit in supporting text.	• Comments noted. .	Evidence updated and the policy revised and updated in line with a number of points made across this topic
Boakes Land Projects • The directive to make WDC a net zero district "as soon as possible" is too absolute and the implications are not clear	• Comments noted	No further action required.
Gladman Developments Ltd • Questions need or policy, considering overlap with Climate change chapter and supporting policies. • Should recognise the importance of balancing requirements with boosting housing delivery.	• Comments noted. The Council consider that they are in conformity with national policy and are justified, in line with support from statutory stakeholders.	No further action required.
Taylor Wimpey	• Comments noted. The Council consider that they are in conformity with national policy and are justified,	No further action required.

• Considered that elements of the policy are not justified or consistent with national policy	in line with support from statutory stakeholders.	
Terra Strategic • Considered to be unnecessary duplication of policy	• Comments noted	No further action required.
Stratkrauft UK Ltd • Endorses general approach	• Support noted.	No further action required.
Eastbourne Eco Action Network CIC • Good intentions with the policy but difficult to deliver	• Comments noted	No further action required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Sussex Wildlife Trust • Strongly supported the policy but requested references to blue infrastructure and clearer encouragement for nature-based solutions to climate change.	• Support noted. Blue infrastructure and nature-based solutions can strengthen the policy's climate resilience and biodiversity outcomes.	Policy has been updated and refers to both GI and nature recovery.
Village Concerns • Requested stronger consideration of development location to reduce vehicle use, including delivery vehicle impacts. Raised concern that policy requirements may be ignored in decision-making if inconvenient.	• Comments noted. The Plan should be read as a whole where wider policies consider these matters.	No specific policy change identified.
Local Residents	**WDC Response**	**Changes made to policy/chapter**

Grouped local residents summary • Support for policy without further comment, alongside wider supportive, general and negative comments. • Support for ambitious climate adaptation and mitigation, including net zero, high insulation standards, solar PV, home batteries, renewable energy, heat pumps and EV charging. • Requests for stronger, more enforceable and measurable policy requirements, including clear targets, monitoring, accountability and whole-life carbon assessment. • Concerns that housing growth, greenfield development and car-dependent locations conflict with the aims of the climate policy and increase emissions. • Calls for stronger flood risk, water management and drainage measures, including grey water use, water butts, reservoirs, SuDS, attenuation and greater powers for water/environmental bodies. • Requests for greater emphasis on biodiversity, native planting, green corridors, soil carbon, farmland protection, regenerative agriculture and retention of mature trees and hedgerows. • Objections and sceptical responses questioned the need, cost and effectiveness of net zero policies, EV policy, climate emergency claims and the compatibility of growth with climate objectives.	• Comments noted. Policy SS8 seeks to provide an overarching approach to climate mitigation and adaptation, supported by more detailed climate change, design, transport, green infrastructure, biodiversity, flood risk and infrastructure policies across the Local Plan.	Evidence updated and the policy revised and updated in line with a number of points made across this topic

Policy SS9: Health, Well-being and Quality of Life

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 130	**Support:** 112	**Neutral:** 18	**Object:** 8

Policy SS9: Health, Wellbeing and Quality of Life		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Natural England • Supported Policy SS9 and its recognition of green infrastructure and access to nature. • Requested a local accessible greenspace target linked to the Green Infrastructure Framework and Standards.	Support noted. The role of accessible green infrastructure in improving health and reducing inequalities is recognised. Green Infrastructure is dealt with under Policy SS10 of the spatial strategy.	No further action required.
East Sussex County Council • Supported Policy SS9 but requested clearer criteria and a standalone restrictive policy for hot food takeaways, betting shops and similar uses. • Requested stronger supporting evidence and definitions covering the wider determinants of health.	The detailed comments have been noted. The Council have considered its evidence base, including that provided by East Sussex County Council and consider that a standalone restrictive policy for hot food takeaways is not required.	An overall review and streamlining of the policy have been undertaken, but no specific further changes have been made.

• Suggested references to relevant health legislation, national policy and strategies, and sustainable transport accessibility.		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
No comments received.	No response required.	No action required.
Town/Parish Councils	**WDC Response**	**Proposed Changes to Policy**
Rotherfield Parish Council • Supported the policy and HIA thresholds. • Considered a pre-application HIA requirement potentially onerous and capable of delaying housing schemes.	Support was noted. HIA requirements will remain proportionate and should not create unnecessary delay with determining a planning application.	No action required.
Heathfield and Waldron Parish Council • Supported Policy SS9 but requested lower HIA thresholds of 20 homes for screening and 75 homes for a full HIA. • Requested stronger emphasis on public spaces, locally distinctive beautiful design and cycling provision.	The requested lower thresholds and policy strengthening were noted, but on balance the proposed thresholds are considered relevant and evidence based. Further emphasis on public spaces, design etc, is achieved through the linkages to other policy areas within the Local Plan	No action required.
Mayfield and Five Ashes Parish Council • Supported the policy. • Requested measurable annual monitoring targets rather than general increase or decrease indicators.	Support and the monitoring recommendation were noted.	No action required to the policy or supporting text. Review monitoring indicators and consider specific measurable targets.
Uckfield Town Council	The delivery, infrastructure and accessibility concerns were noted and will be addressed	No action required.

• Questioned implementation, enforcement and delivery of community infrastructure, allotments and orchards. • Raised concerns about active travel, community integration, congestion, air and water quality, and suitable housing for older and disabled residents.	through policy implementation and other related policies.	
Laughton Parish Council • Supported the policy but considered the thresholds would overlook cumulative impacts from small and windfall schemes in villages.	The concern about cumulative impacts and smaller schemes was noted. The HIA thresholds are starting points for consideration and cumulative impacts can be taken into account when determining if an application enquires a HRA.	No action required.
Arlington Parish Council • Supported the policy but considered the proposed sports centre car-dependent and inconsistent with 20-minute neighbourhood principles. • Requested frequent electric buses and safe walking and cycling routes.	The accessibility concerns were noted.	An overall review and streamlining of the policy have been undertaken, but no specific further changes have been made
Hailsham Town Council • Requested clearer HIA criteria and decision-making guidance for hot food takeaways and betting shops. • Suggested criteria covering clustering, proximity to schools, noise, odour and parking.	The need for clear and usable development management criteria was noted.	An overall review and streamlining of the policy have been undertaken, but no specific further changes have been made

Polegate Town Council • Supported HIAs but requested clarity on enforcement and consequences where criteria were not met. • Raised concerns about loss of recreation space and contaminated land testing.	The implementation and environmental health concerns were noted.	No action required.
Horam Parish Council • Requested priority for local food production, transparent HIA scoping and a 10-home threshold for major development.	Comments were noted. The thresholds have been reviewed and are considered relevant based on the evidence base.	No further action required.
Isfield Parish Council and Withyham Parish Council • Supported Policy SS9 and requested no changes.	Support was noted.	No action required.
East Hoathly with Halland Parish Council • Requested a 10-home HIA threshold and assessment of integration with the wider area. • Raised concerns about the sports centre location and requested electric buses and safe active travel routes.	The threshold and accessibility concerns were noted. The thresholds have been reviewed and are considered relevant based on the evidence base.	No further action required.
Westham Parish Council • Requested stronger controls to prevent reductions in affordable and smaller homes and measures to discourage land banking.	The concerns were noted. Planning obligations and delivery mechanisms are addressed through relevant legislation and policies.	No further action required.

Ninfield Parish Council • Supported the policy but requested scrutiny of the HIA approach and flexibility for rural areas where active travel infrastructure may be impractical or urbanising.	The need for a proportionate rural approach was noted. Implementation will respond to local rural context.	No further action required.
Willingdon and Jevington Parish Council • Requested a new medical centre for Willingdon and Polegate before further housing was built.	The need for timely healthcare infrastructure was noted. This is being reflected in the Infrastructure Delivery Plan (IDP).	Consider comments through the IDP. No further changes required.
Wartling Parish Council • Questioned reliance on developer contributions and requested identification of suitable land for medical facilities with health partners.	The funding and healthcare delivery concerns are noted. These issues will be reflected through the IPD.	Consider comments through the IDP. No further changes required.
Hellingly Parish Council • Requested new cycling, walking, wheeling and bus routes rather than reliance on existing routes such as the Cuckoo Trail.	The need for wider sustainable transport connections was noted. These issues will be reflected through the IPD.	Consider comments through the IDP. No further changes required.
Site Promoters	**WDC Response**	**Proposed Changes to Policy**
Persimmon Homes South East • Objected to application-level HIAs where development complied with a plan informed by a whole-plan HIA. • Suggested HIAs only for large unallocated sites.	The concern about duplication is noted. Site-level assessments may still be justified where material health effects require detailed consideration.	No action required.

Wates Development • Considered application-level HIAs unnecessary and onerous. • Suggested a threshold above 500 homes or alignment with Environmental Impact Assessment requirements.	The proportionality and duplication concerns were noted. The HIA threshold and evidence requirements were reviewed for proportionality and are considered appropriate.	No action required.
Hertfordshire Holdings (Tor and Co) • Considered the policy too wordy and requested shorter, simpler wording. • Suggested proportionate HIA guidance through validation checklists.	The clarity and proportionality comments were noted.	An overall review and streamlining of the policy have been undertaken, but no specific further changes have been made
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Village Concerns • Supported the policy and HIA thresholds. • Requested recognition of rural isolation and loneliness.	Support was noted. Rural isolation is a relevant health determinant, but no further reviews are considered necessary.	No action required.
Dicker Residents' Association • Supported the policy and requested greater use of existing or redundant community spaces for wellbeing activities.	The efficient use of accessible community facilities was noted.	No action required.
CIHT • Supported the policy but requested a proportionate HIA requirement for schemes of three or more homes.	The lower threshold request was noted. The thresholds have been reviewed and are considered relevant based on the evidence base	No action required.

Clarity Ecoworks • Objected to the 150-home HIA threshold and requested a 50-home threshold. • Requested explicit consideration of cumulative effects.	The threshold and cumulative impact concerns were noted. The thresholds have been reviewed and are considered relevant based on the evidence base	No action required.
Eastbourne Eco Action Network • Supported the policy and requested active travel routes to reduce car use and pollution.	Support for active travel was noted.	No action required.
Willingdon Residents' Association • Requested a new medical centre before further housing and raised concerns about recreation space capacity.	The timely delivery of healthcare and open space infrastructure was noted. This will be dealt with through infrastructure policies and the supporting IDP.	No action required.
The Working Group Against Over Development, CPRE Sussex, BP and South West Strategic Developments • Supported Policy SS9 and requested no changes.	Support was noted.	No action required.
Conservators of Ashdown Forest • Supported the policy and requested improved public transport access to Ashdown Forest.	The sustainable access request was noted. This issue is not specific to the planning policy, and will be addressed in other areas of the Local Plan.	No action required.
Wealden Food Partnership • Requested access to healthy local food, stronger links between local production and	The relationship between food access and health was noted.	No action required.

communities, and consideration of procurement and food partnerships.		
Uckfield Chamber of Commerce • Supported the policy and HIAs but requested sufficient medical infrastructure to serve growth.	Support and the infrastructure concerns were noted. This will be dealt with through infrastructure policies and the supporting IDP.	No further action required.
Transport Futures East Sussex • Supported the policy and requested stronger attention to mental health, access to nature, cumulative impacts and reduced vehicle permeability.	The recommendations for healthy transport and nature access were noted.	An overall review and streamlining of the policy have been undertaken, but no specific further changes have been made
Friends of the South Downs • Highlighted the health value of the South Downs and requested improved links from Polegate, Wannock and Willingdon.	The health benefits and access concerns were noted.	No action required.
Uckfield Community Technology College • Requested improved walking, cycling, public rights of way, sports access and connected green exercise routes. • Requested review of Sustrans evidence and stronger joint working with the county council.	The active travel, recreation and partnership-working recommendations were noted. The issues raised will be reflected through the IDP.	No further action required to the policy or supporting text.
Hyde Housing Association • Supported the policy and thresholds.	Support and the housing mix concern were noted. The issue will be consider through Policy HO1 and supporting housing evidence.	No further action required to the policy or supporting text.

• Requested a better mix of one- and two-bedroom affordable rented homes to avoid concentrations of vulnerable single-person households.		
Sport England • Supported the policy and requested reference and a link to the updated Active Design guidance and checklist.	The recommendation was noted and would support healthy design implementation. Design issues will be covered by supporting design policy in the Local Plan.	No further action required to the policy or supporting text.
NHS Property Services • Supported the policy, full HIA threshold and screening approach. • Requested criteria on climate resilience, local context and heritage, and housing mix and affordability.	There are strong linkages to other policies in the Local Plan which need to be considered together in determining planning applications	No further action required.

Local Residents	WDC Response	Proposed Changes to Policy
Local residents, grouped response • Many residents supported Policy SS9, its health objectives and some or all HIA requirements. • Views on HIA thresholds varied widely, from all schemes or 3, 4, 9, 10, 20, 50 or 75 homes to higher thresholds, tiered screening or plan-level assessment only.	The broad support and differing views on thresholds were noted. The policy will remain proportionate, evidence-led and capable of addressing cumulative effects and local circumstances. Infrastructure, pollution, green space, accessibility and housing matters are be considered through related policies and delivery mechanisms.	No further action required to the policy further to the issues raised above.

• Residents requested cumulative and context-sensitive assessment, public transparency, enforceability and consideration of rural deprivation and smaller settlements. • Main concerns included healthcare and school capacity, congestion, air, noise and water pollution, sewage and flood risk, loss of green space and biodiversity, and overdevelopment. • Suggestions included active travel, public transport, safer roads, car-free design, accessible recreation, local food growing, community facilities, climate resilience and a broader mix of accessible housing.		

Policy SS10: Green Infrastructure

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 139	**Support:** 88	**Neutral:** 29	**Object:** 19

Policy SS10: Green Infrastructure		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Suggests the policy should refer to blue infrastructure and amend wording to "walking, wheeling and cycling".	• Comments noted. References to blue infrastructure and inclusive active travel terminology will improve consistency with the wider vision and accessibility objectives.	Policy references updated as relevant.
Natural England • Supports the policy but seeks stronger wording requiring all development to protect, improve and enhance GI; recommends inclusion of Accessible Greenspace Standards and alignment with Natural England's GI Framework.	• Comments noted.	Policy updated as relevant.
Southern Water • Supports the sustainable drainage, flood risk and urban cooling elements of the policy and highlights the importance of separating surface water from	• Support noted. The policy already recognises the role of GI in sustainable drainage, flood risk management and climate change adaptation.	No substantive change required.

wastewater to reduce pressure on sewerage infrastructure.		
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tunbridge Wells Borough Council • Requests recognition that GI crosses administrative boundaries and should connect with provision in neighbouring districts, including Royal Tunbridge Wells.	• Comment noted.	No action required.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Uckfield Town Council • Seeks greater emphasis on green and blue infrastructure, national character areas, woodland, LNRS/NRN, restoration, recovery and links between Ashdown Forest, SDNP and Pevensey.	• Comments noted but policy also needs to be pragmatic in terms of what can be realistically achieved. It is considered the revised policy strikes this balance.	Policy wording has been updated
Rotherfield, Laughton, Isfield, Withyham, Mayfield and Five Ashes, and Maresfield Parish Councils • Support the policy.	• Support noted.	No action required.
Heathfield and Waldron Parish Council • Suggests recognising links between GI and farming/agriculture and giving firmer support to infrastructure development itself.	• Comment noted. GI can overlap with agricultural diversification and BNG delivery.	No action required. Support through other policies in the Local Plan.
Arlington Parish Council	• Comment noted. Tree protection and long-term maintenance are relevant to GI delivery and planning conditions/obligations.	No action required. Support through other policies in the Local Plan.

• Requests stronger protection for mature trees and improved monitoring of planting required through planning consent.		
Hailsham Town Council • Raises concern that new development cannot be relied upon to address wider GI deficiencies and calls for an updated detailed GI strategy including retrofitting green spaces and pocket parks.	• Comment noted. The Local Plan can only deliver what is with its remit.	No change required.
Horam Parish Council • Requests deleting "Where relevant" and requiring GI deficiencies in the wider area to be listed/defined by WDC before applications.	• Comment noted.	The Policy has been updated and generally addresses this point.
Pevensey Parish Council • Requests inclusion of blue infrastructure, particularly given the coastline and water environments.	• Comment noted. The policy applies to both blue and green infrastructure.	No action required.
Frant Parish Council • Broadly supports the policy and considers it may help address land banking issues.	• Support noted.	No action required.
Westham Parish Council • Raises concern that sites WE5 and WE6 would lead to significant loss of GI, including wildlife corridors and links to the 1066 walk, Pevensey Levels and Cuckoo Trail.	• Comment noted. Site-specific GI impacts are considered through the site assessment process and allocation policies where relevant.	See updates to relevant site policies ad supporting evidence.

Ninfield Parish Council • Generally agrees but requests deletion of "Where relevant" to make the policy more robust.	• Comment noted.	The Policy has been updated and generally addresses this point.
Willingdon and Jevington Parish Council • Raises concern about recreational space deficiencies, accessibility to the South Downs, floodplain constraints and the need for a Willingdon Park and accessible footpaths.	• Comment noted.	No direct policy wording change.

Site Promoters	WDC Response	Changes made to policy/chapter
KLW Planning Development Consultants • Objects that the GI mapping dataset is not robust, includes features such as young trees/nursery land, and that the policy is overly protectionist and internally inconsistent with supporting text on business attractiveness and BNG.	• Comments noted. The evidence base provides a robust basis for the policy and there is a clear relationship between GI and BNG which is appreciated and referenced in the policy and supporting text.	No action required.
Hertfordshire Holdings / Tor and Co • Considers the long policy should be replaced with succinct text and updated when the GI Strategy is prepared; promotes Hailsham landholding as an opportunity for multifunctional greenspace in the Cuckmere corridor.	• Comments noted. Site-specific matters are considered through allocations work.	No specific policy change.

Grassroots Planning • Supports the criteria for high-quality, accessible and biodiverse open spaces and considers a garden community could meet the policy requirements.	• Support noted.	No action required.
Neville Estate Company • Raises similar objections to KLW regarding robustness of GI mapping, inclusion of young trees/nursery land, and policy consistency with GI and BNG supporting text.	• Comments noted. The evidence base provides a robust basis for the policy and there is a clear relationship between GI and BNG which is appreciated and referenced in the policy and supporting text.	No action required.
Turley / Martin Grant Homes & Harcourt Developments Ltd • Highlights proposals for significant GI at the BIEN site, improved connectivity through Uckfield, wider SANG/GI opportunities and requests engagement with WDC and Uckfield Town Council.	• Comments noted. Site-specific GI opportunities are considered through the site assessment/allocation process.	No direct change to Policy SS10.
Terra Strategic • Supports meaningful GI in new schemes but seeks a viability caveat, particularly for redevelopment and brownfield sites where green roofs may not be achievable.	• Comment noted. Policy implementation is proportionate and take account of site circumstances and viability where appropriate.	No action required.
Wates Development • Supports GI enhancement in principle but objects that protecting all existing GI is unrealistic; seeks wording allowing some	• Comment noted. Policy wording is clear and realistic while maintaining strong protection and enhancement objectives. T	No action required

loss where compensated so there is no overall net loss.		
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Clarity Ecoworks, CPRE Sussex, Construction Industry, Sport England and the Working Group Against Overdevelopment • Generally agree with the policy.	• Support noted.	No action required.
Sussex Wildlife Trust • Strongly supports the policy but is disappointed the GI evidence has not been updated for consultation.	• Support and comments noted.	No immediate policy change. GI Study is used as evidence base for the policy.
Village Concerns • Concerned that infill development up to woodland edges removes woodland setting and landscape/amenity value; seeks protection for open countryside around village woodlands.	• Comment noted. Woodland setting, buffers and landscape value are relevant to GI and design considerations and are covered generally under the policy and supporting text.	No action required.
Chartered Institute of Highways and Transport • Seeks commitment to promoting and providing safe walking and cycling routes and encouraging voluntary groups supporting group activities.	• Comment noted. Active travel is an important GI function and aligns with accessibility objectives.	No action required.
Hyde Housing Association • Supports flexibility where 20% BNG may make brownfield housing schemes unviable,	• Comment noted. Flexibility may be required where wider planning benefits and viability considerations justify it.	No direct change to SS10 .This is related specifically to the BNG policy.

particularly where overgrown brownfield sites score highly for biodiversity.		
Uckfield Community Technology College • Raises extensive concerns about sewerage, CSOs, river habitats, buffers, wet habitats, nature recovery, water quality, Pevensey/Ashdown impacts, Weald to Waves and stronger protection for corridors and water environments.	• Comments noted. The policy recognises green and blue infrastructure, water environments, ecological corridors and nature recovery, while infrastructure/sewerage matters are also addressed through relevant infrastructure policies.	No action required.
Eastbourne Eco Action Network CIC • Calls for greater active travel focus and delivery of routes, including links to the Cuckoo Trail and LTN 1/20 compliant tracks.	• Comment noted. Active travel delivery is relevant to GI accessibility and sustainable movement.	No action required.
Dicker Residents Association • Seeks more emphasis on protecting public and private green open space for visual wellbeing, exercise and countryside access, and prioritising brownfield sites.	• Comment noted. Protection and accessibility of green open space are central to the policy.	No direct change required
Conservators of Ashdown Forest • Suggests investment in habitat bridges, underpasses and other GI to reduce impacts of hard infrastructure on Ashdown Forest wildlife movement and road safety.	• Comment noted. Strategic GI can support ecological connectivity and reduce severance effects.	No direct change required
Friends of Park Wood Hellingly • Raises concern about loss of green spaces, pressure on beauty spots/South Downs and	• Comment noted. GI and open space design should support safe, accessible and high-quality spaces.	No direct change required.

poor siting of children's play areas near busy roads.		
Friends of South Downs • Supports access objectives but seeks substantial improvements to links from Polegate/Willingdon to the South Downs and greater coordination between authorities.	• Comment noted. Cross-boundary access and coordination are relevant to strategic GI planning.	No direct change required
Wealden Food Partnership • Seeks recognition of farmland and food production as part of local food security, wildlife-supportive farming and wider GI considerations.	• Comment noted. Agricultural land can contribute to multifunctional landscapes but the policy should remain focused on GI functions.	No direct change required
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Grouped local resident comments • 21 residents supported the draft policy without further comment. • Supportive comments sought explicit mapping and safeguarding of GI corridors, Weald to Waves and nature recovery networks, protection of ancient woodland/green spaces, and inclusion of farming/food production benefits. • Objections argued the policy is not strong enough, does not adequately protect existing green space/wildlife habitat, should delete "Where relevant", and should better address enforcement and GI deficiencies. • Residents asked for more brownfield-first development, stronger protection for	• Comments noted. The policy has been strengthened where appropriate to better reference green and blue infrastructure. Site-specific concerns are addressed through site assessments and allocation policies.	The Policy has been updated and generally addresses a number of these points.

hedgerows, wetlands, mature trees, Pevensey Levels, Bewl Water and green corridors, plus better public access and active travel connections. • Several comments criticised past planning decisions, loss of greenfield land and lack of replacement accessible green space, particularly around Polegate, Willingdon, Hailsham, Westham/Peelings Lane and East Hoathly. • Some residents sought a more flexible approach for smaller schemes and redevelopment, noting that GI requirements should be proportionate, practical and viable.		

Climate Change

Policy CC1: Net Zero Development

WDC Response to the Regulation 18 Consultations

Total: 150	Support: 99	Neutral: 9	Object: 42

Policy CC1 Net Zero Development		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
National Highways • Support Policy CC1. • Recommends inclusion of commitments to net zero maintenance and construction emissions by 2040 and net zero road-user emissions by 2050.	• Support welcomed. • The comments reinforce the importance of transport decarbonisation in achieving net zero outcomes. • The Local Plan addresses transport emissions through a range of transport policies.	No change proposed to policy but consider general amendment and streamlining of supporting text.
NHS Property Services • Support Policy CC1. • Suggests carbon offset funds could support decarbonisation of NHS facilities.	• Comment noted.	No change required

Brighton & Hove Buses • Considers greater emphasis should be placed on sustainable transport, bus infrastructure, bus priority and public transport provision to reduce transport emissions.	• Comment noted. • Sustainable transport is an important component of emissions reduction. • These matters are principally addressed through transport-related policies elsewhere in the Plan.	No change required
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tunbridge Wells BC • Supportive of the policy. • Suggest prioritising local carbon insetting over offsetting.	• Support welcomed.	The policy has been restructured and reviewed generally.
Eastbourne BC • Supportive of the policy. • Suggest stronger consideration of solar PV.	• Support welcomed. • The role of solar PV in reducing operational carbon emissions is recognised.	No change required
Rother DC • Support continued joint working and evidence sharing between authorities.	• Comment welcomed. Cross-boundary working will continue through plan preparation.	No change required.
Lewes DC • Supportive of the policy. • Suggest stronger consideration of solar PV.	• Support welcomed. • The role of solar PV in reducing operational carbon emissions is recognised.	No change required
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Home Builders Federation	• The Council notes the concerns.	No change required.

• Strongly object. • Considers operational energy and embodied carbon standards inconsistent with the Written Ministerial Statement and national policy. • Challenges viability evidence, embodied carbon targets, monitoring requirements and soundness of the policy. • Requests significant amendment or deletion	• Since the Reg 18(1) consultation, the Council has produced and published its climate change evidence and viability testing which demonstrate the policy is justified, achievable and effective. • The evidence base supports the Council's commitment to ambitious carbon reduction standards. • The policy is not inconsistent with national policy.	
Care UK • Support sustainability objectives but seek flexibility for specialist uses such as care homes due to their higher operational energy demands and bespoke design requirements	• Comment noted. • The Council acknowledges that some specialist building typologies may have unique operational requirements. • The policy already provide for a flexibility approach.	No change required.

Taylor Wimpey UK Ltd • Object to the policy. • States no robust evidence currently exists to support the proposed standards. • Notes the Viability Assessment acknowledges uncertainty regarding net zero carbon costs. • Considers the policy unjustified, ineffective and unsound. • Raises concerns regarding operational energy, embodied carbon requirements, carbon offsetting and consistency with national policy.	• The Council notes concerns regarding the evidence base and viability implications of the policy. • Since the Reg 18(1) consultation, the Council has produced and published its climate change evidence and viability testing which demonstrate the policy is justified and effective. • The evidence base supports the Council's commitment to ambitious carbon reduction standards. • The policy is not inconsistent with national policy.	Policy has generally been updated to reflect latest background evidence.
Persimmon Homes South East • Supportive of net zero objectives but consider there is no need for local standards beyond national requirements. • Policy is overly complex, may impact viability and delivery, and should align with Building Regulations and the Future Homes Standard.	• The Council notes the preference for reliance upon national standards. However, since the Reg 18(1) consultation, the Council has produced and published its climate change evidence and viability testing which demonstrate the policy is justified and effective. • The evidence base supports the Council's commitment to ambitious carbon reduction standards. • The policy is not inconsistent with national policy.	Policy has generally been updated to reflect latest background evidence.
Bellway Strategic (and associated land interests) • Support the principle of reducing emissions but considers standards above Building	• The Council acknowledges concerns, however, since the Reg 18(1) consultation, the Council has	Policy has generally been updated to reflect latest background evidence.

Regulations must be fully justified and viability tested. • Raises concerns regarding evidence gaps, including the absence of a published Climate Change Strategy.	produced and published its climate change evidence and viability testing which demonstrate the policy is justified and effective. • The evidence base supports the Council's commitment to ambitious carbon reduction standards. • The Council also has a published Climate Change Strategy which the Policy will support delivery of.	
Vistry Group • Support the objectives of the policy but argue development standards should remain flexible and align with evolving legislation and building regulations. • States overly restrictive standards could inhibit development delivery.	• The Council agrees policy should incorporate sufficient flexibility to respond to future legislative changes whilst still delivering meaningful carbon reduction • Since the Reg 18(1) consultation, the Council has produced and published its climate change evidence and viability testing which demonstrate the policy is justified, achievable and effective. • The evidence base supports the Council's commitment to ambitious carbon reduction standards.	Policy has generally been updated to reflect latest background evidence.

Wates Development • Object to the policy as drafted. • Considers Government policy supports nationally consistent standards. • There is insufficient justification to exceed emerging Future Homes Standard requirements	• The Council notes the comments • Since the Reg 18(1) consultation, the Council has produced and published its climate change evidence and viability testing which demonstrate the policy is justified, achievable and effective. • The evidence base supports the Council's commitment to ambitious carbon reduction standards. • The policy is not inconsistent with national policy.	Policy has generally been updated to reflect latest background evidence.
Gladman Developments Ltd • Question whether the Policy is necessary, given the Future Homes Standard and national approach to achieving net zero development.	• The Council notes the comments. Whilst national standards are evolving, local policy can contribute to achieving climate objectives where supported by evidence • Since the Reg 18(1) consultation, the Council has produced and published its climate change evidence and viability testing which demonstrate the policy is justified, achievable and effective. • The evidence base supports the Council's commitment to ambitious carbon reduction standards. • The policy is not inconsistent with national policy.	Policy has generally been updated to reflect latest background evidence.

Grosvenor Property UK Ltd • Object on the basis that the policy standards exceed Building Regulations and are not expressed as a percentage uplift to Target Emissions Rates as referenced by the WMS. • Welcomes flexibility provisions	• The Council notes the comments. Whilst national standards are evolving, local policy can contribute to achieving climate objectives where supported by evidence • Since the Reg 18(1) consultation, the Council has produced and published its climate change evidence and viability testing which demonstrate the policy is justified, achievable and effective. • The evidence base supports the Council's commitment to ambitious carbon reduction standards. • The policy is not inconsistent with national policy. • The standards as expressed in the policy are a much more effective means of achieving net zero in development and are advocated for in the industry by LETI, the UK Green Building Council and others.	Policy has generally been updated to reflect latest background evidence.
Sigma Strategic Land • Consider the policy to be overly prescriptive and inconsistent with national policy. • Support carbon reduction but seek alignment with the WMS and Future Homes Standard.	• Comments noted. • Policy can be streamlined to provide clarity and consistency whilst maintaining ambitious climate objectives. • LPAs are permitted to push for more ambitious standards / targets where there is robust evidence to support and justify that stance.	Policy has generally been updated to reflect latest background evidence.

	• Since the Reg 18(1) consultation, the Council has produced and published its climate change evidence and viability testing which demonstrate the policy is justified, achievable and effective.	
Other Developers, Landowners and Site Promoters • Generally, support reducing emissions and delivering sustainable development, but consider that the policy is insufficiently evidenced, overly complex, inflexible and potentially harmful to viability and housing delivery. • Concerns focus on embodied carbon requirements, operational energy targets, viability exemptions, national policy consistency and Future Homes Standard alignment. • Some support simplified drafting and greater policy flexibility	• The Council notes the broadly consistent concerns raised regarding deliverability, viability and implementation. • Since the Reg 18(1) consultation, the Council has produced and published its climate change evidence and viability testing which demonstrate the policy is justified, achievable and effective. • Embodied carbon is a large contributor to emissions in development and is not widely addressed in terms of targets in national policy and so it is appropriate to address it through local policy.	Policy has generally been updated to reflect latest background evidence.
CPRE Sussex / Working Group Against Over Development • Strongly support the policy and ambitions for net zero development.	• Support welcomed.	No change required.

Village Concerns • Support the policy but consider terms such as "consider opportunities" and viability exemptions weaken delivery. • Requests stronger monitoring arrangements	• Comment noted. • The Council agrees monitoring arrangements should be strengthened and clarified.	Policy has generally been updated to reflect latest background evidence. Monitoring requirements reviewed.
Clarity Ecoworks • Seeks mandatory air source and ground source heat pumps	• The Council notes support for stronger renewable technology requirements but considers technology-neutral wording remains appropriate to allow for technological advancements or different approaches which are still effective.	No change required.
Green Transition Crowborough • Support ambitious standards but seeks clarification on "net zero carbon ready" wording.	• Comment noted.	Policy has generally been updated to reflect latest background evidence.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield & Five Ashes PC • Supportive of policy but oppose viability exemptions and suggest phased embodied carbon targets rather than a cliff-edge in 2030.	• Comment noted.	No change required.

Uckfield Town Council • Supportive of policy but seek flexibility for future technological change and stronger monitoring.	• Comment noted. The policy is adaptable to future innovation.	No change required.
East Hoathly & Halland PC • Seek mandatory solar PV, battery storage and air-source heat pumps. • Oppose policy flexibility	• The Council notes the desire for stronger requirements but considers some flexibility necessary to address site-specific circumstances.	No change required
Chiddingly PC • Supportive of policy and seek mandatory solar PV on all new buildings.	• Comment noted. • The role of solar PV in achieving operational carbon reductions is recognised within the policy.	No change required
Local Residents	**WDC Response**	**Changes made to policy/chapter**
• Strong support for ambitious net zero standards and higher performance than Building Regulations	• Support welcomed. • The Council remains committed to reducing operational and embodied carbon emissions through development.	No change required

• Calls for mandatory solar PV, battery storage, heat pumps and Passivhaus standards	• Comments noted. • The Policy requires applicants to follow the energy hierarchy in their scheme design including installation of solar PV and battery storage and heat pumps. • Policy needs to retain some flexibility to accommodate occasions where these may not be achievable but development can still reach net zero.	No change required
• Concerns that viability exemptions undermine the policy	• The Council recognises the need to balance ambition with deliverability. • Part 3 of the Policy clearly sets out that applicants must provide robust evidence / justification where requirements cannot be met in full and this is considered sufficient.	No change required
• Requests for stronger monitoring, enforcement and post-construction verification	• Agreed. • Monitoring and verification is important to demonstrate policy effectiveness.	Monitoring framework reviewed.

• Mixed views regarding carbon offsetting. Some support local insetting while others oppose offsetting entirely.	• Comments noted. • The Council will review the role of offsetting and insetting within the policy framework	Policy and supporting text has removed reference to carbon offsetting instead relying on the requirement for proposals to follow and implement the energy hierarchy.

Policy CC2: Reducing Energy Consumption in Existing Buildings

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 106	**Support:** 88	**Neutral:** 3	**Object:** 15

Policy CC2: Reducing Energy Consumption in Existing Buildings		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
NHS Property Services • Supports Policy CC2 and notes that NHS property could benefit from any future carbon offset fund, supporting the NHS aim to become the world's first net zero healthcare provider.	• Support noted. The Council recognises the role that existing public-sector buildings can play in reducing energy consumption and carbon emissions.	No action required.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Eastbourne Borough Council	• Support noted.	No action required.

• Supports Policy CC2, including the inclusion of circular economy principles.		
Rother District Council • Neutral. Supports continued collaboration and shared evidence to help secure consistent policies across administrative boundaries.	• Comments noted. The Council will continue to work constructively with neighbouring authorities on relevant cross boundary matters.	No action required.
Lewes District Council • Supports Policy CC2, including the proposed fabric requirements for new developments and conversions and the inclusion of circular economy principles.	• Support noted.	No action required.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Polegate Town Council • Supports Policy CC2. Suggests better insulation and more efficient boilers and notes that new buildings should achieve high energy efficiency standards, while recognising the cost challenges of upgrading older buildings, particularly commercial premises.	• Support noted. The policy seeks to encourage improved energy performance while recognising that viability and the characteristics of existing buildings may affect deliverability.	No action required.
Heathfield & Waldron Parish Council • Supports Policy CC2 but suggests amending CC2, paragraph 2 to refer to opportunities "to consider and to adopt". Also seeks a clearer definition of economic viability.	• Comments noted.	The policy has been reviewed and restructured in general.
Laughton Parish Council	• Comments noted. The scope of the policy and strength of wording	The amended wording 'strongly encouraged' is considered suitable in regard to retrofit.

• Supports Policy CC2 but asks whether requirements apply to all proposals involving existing buildings or only schemes requiring a Sustainability Statement. Also considers that retrofit standards should be required rather than encouraged.	around retrofit standards has been reviewed.	
Uckfield Town Council • Supports Policy CC2 and highlights a funding gap for substantial energy efficiency improvements to homes, schools and community buildings. Suggests S106 or CIL funding could help refurbish community infrastructure and support renewable energy improvements.	• Comments noted. Funding mechanisms sit partly outside the scope of the policy.	No direct policy change required.
Arlington Parish Council • Neutral. Suggests an energy source hierarchy for existing buildings and highlights the benefits of ground source heating, solar panels, green roofs, living walls and green facades.	• Comments noted. The policy encourages measures to reduce energy consumption, and detailed design solutions will be considered through individual proposals.	No action required.
Mayfield and Five Ashes Parish Council • Supports Policy CC2 but considers that monitoring indicators should be more clearly quantified. Suggests targets for annual reductions to 2040 and a comparable indicator to Policy CC1 based on EPC rating achievement or improvement for existing buildings.	• Comments noted. Monitoring indicators and targets have been reviewed as part of the monitoring framework.	Amended monitoring framework.

Rotherfield Parish Council • Supports Policy CC2 and provided no detailed comments.	• Support noted.	No action required.
Horam Parish Council • Supports Policy CC2 and provided no detailed comments.	• Support noted.	No action required.
Withyham Parish Council • Supports Policy CC2 and provided no detailed comments.	• Support noted.	No action required.
Hailsham Town Council • Supports Policy CC2 and provided no detailed comments.	• Support noted.	No action required.
Chiddingly Parish Council • Supports Policy CC2 but considers that solar PV should be required on all new residential and industrial buildings to reduce pressure for solar farms on greenfield land.	• Comments noted. Requirements for new development are principally addressed through policies relating to new buildings, but the wider role of renewable energy has been considered.	No direct amendment to Policy CC2 required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Hop Farm Real Estate Limited and Nevill Estate Company	• Comments noted. The Council recognises that viability and deliverability must be considered, but the policy objective of improving	The policy has been reviewed and restructured in general.

• Object to Policy CC2, considering it unrealistic and undeliverable without significant support, grants or tax incentives.	energy performance in existing buildings remains important.	
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Village Concerns • Supports Policy CC2 and provided no detailed comments.	• Support noted.	No action required.
Dicker Residents Association • Supports Policy CC2 and considers that a long-term national policy with enforceable standards and penalties would be beneficial.	• Support noted. National regulatory standards sit outside the scope of the Local Plan, but the comment is acknowledged.	No action required.
Clarity Ecoworks • Supports Policy CC2 and provided no detailed comments.	• Support noted.	No action required.
The Working Group Against Over Development and CPRE Sussex • Support Policy CC2 and request that any viability evidence used to justify a BREEAM standard lower than excellent is made publicly available.	• Support noted. The Council will consider how viability evidence should be handled in accordance with relevant planning guidance and transparency requirements.	No action required.
Uckfield Community Technology College	• Comments noted. Consultation responses reviewed and used to	No action required.

• Supports Policy CC2 and requests that community feedback from the consultation is reviewed and necessary changes made.	inform any necessary policy changes.	
Eastbourne Eco Action Network C.I.C. • Supports Policy CC2 and suggests community heating, solar PV and insulation for blocks of flats.	• Support noted. These measures are consistent with the aims of improving energy efficiency in existing buildings and may be considered through relevant proposals.	No action required.
Sussex Wildlife Trust • Supports Policy CC2 and provided no detailed comments.	• Support noted.	No action required.

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents • 59 residents support Policy CC2 without detailed comments. • 8 residents support Policy CC2 and raise points including inadequate EPC measures, flexibility for retrofitting older and listed buildings, the need for grants/loans, public education, trustworthy advice and concern about viability impacts on extensions and improvements. • Neutral comments support the aim of reducing energy consumption but seek clearer targets,	• Comments noted. The policy seeks to support energy reduction in existing buildings while recognising that feasibility, viability, building characteristics and national regulatory frameworks may affect implementation. Suggestions on clearer targets, advice, funding mechanisms and support have been considered where relevant to the Local Plan.	The policy has been reviewed and restructured in general. No further action required on matters outside the Local Plan's remit.

wider building coverage, deep retrofit programmes, renewable energy incentives, green finance, community energy projects, mandatory energy audits, stronger guidance, support for low-income households, lifecycle carbon consideration and integration with wider sustainability objectives. • 12 residents/objectors oppose Policy CC2 or elements of it, raising concerns that climate change policy should not be imposed, that the policy is unrealistic without support or incentives, that older buildings are difficult to retrofit, that replacement may sometimes be more efficient than reuse, that PAS 2035 guidance is changing, and that Building Control rather than the Local Plan should address some matters.		

Policy CC3: Sustainable Design and Construction

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 119	**Support:** 101	**Neutral:** 6	**Object:** 12

Policy CC3: Sustainable Design and Construction		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Supports conservation of natural resources and the requirement for development to contribute to green and blue infrastructure within CC3 1(d) and 1(f).	• Support noted.	No action required.
National Highways • Supports CC3 and recommends the Local Plan includes firm commitments to net zero maintenance and construction emissions by 2040 and net zero road user emissions by 2050.	• Comments noted. The Local Plan seeks to support sustainable design and construction, although detailed transport emissions commitments are addressed through wider national and transport policy.	No direct change to CC3 required.
NHS Property Services • Supports Policy CC3.	• Support noted.	No action required.
Environment Agency • Neutral. Requests reference to flood resilient/resistant construction within CC3 and stronger links to CC7.	• Comments noted. Amended text will be considered to help strengthen the relationship between sustainable	Part 1 and 2 of the policy have been restructured and streamlined. General amendments and streamlining

Suggests sustainable design/construction should demonstrate how flood risk issues will be addressed and that CC3 1(d) could refer to conserving and enhancing natural resources.	construction, flood resilience and Policy CC7.	have been undertaken on the policy.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
No comments identified.	n/a	n/a
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Heathfield & Waldron Parish Council • Supports CC3 but seeks clearer definition of "high environmental performance", stronger wording on artificial grass, removal/tightening of "where possible" for low carbon heating, inclusion of double roof systems, and reference to longevity in supporting text.	• Comments noted. Detailed technical standards must remain proportionate and consistent with national policy.	General amendments and streamlining have been undertaken on the policy.
Laughton Parish Council • Supports CC3 but suggests stronger wording on high embodied carbon materials, low carbon heating, mandatory overheating assessment, and applying sustainability statements to all proposals rather than only larger schemes.	• Comments noted. The policy will set clear expectations while remaining proportionate to the scale and type of development.	General amendments and streamlining have been undertaken on the policy.
Rotherfield Parish Council • Supports CC3 but considers expert advice is needed for scheme evaluation before applications are determined.	• Support noted. Implementation will be considered through development management processes and technical consultation where required.	No policy change required.
Mayfield and Five Ashes Parish Council	• Comments noted. The wording of paragraph 2 and monitoring framework	Monitoring indicators have been reviewed.

• Strongly supports CC3. Requests deletion of "Where possible" from paragraph 2, low carbon heating exemptions only for technical constraints or other policy requirements, and quantified monitoring baselines and targets up to 2040.	can be reviewed to ensure clarity and effectiveness.	General amendments and streamlining have been undertaken on the policy.
Polegate Town Council • Broadly supports CC3. Notes that new architecture and modern design can fit some surroundings, but local context should always be considered.	• Support noted. Local context is addressed through wider design policies.	No action required.
• Withyham **Parish Council** Supports CC3.	• Support noted.	No action required.
Horam Parish Council • Supports CC3.	• Support noted.	No action required.
Hailsham Town Council • Supports CC3.	• Support noted.	No action required.
East Hoathly with Halland Parish Council • Neutral. Emphasises energy efficiency, less car-dependent development, remote working supported by faster broadband, greener transport and compliance with sustainable design principles.	• Comments noted. The policy supports sustainable design, with transport and digital connectivity matters addressed elsewhere in the Plan.	No direct change to CC3 required.
Westham Parish Council • Neutral. Raises concerns about enforcement powers and suggests a charge should be included to offset inspection costs when planning permission is granted.	• Comments noted. Enforcement and monitoring mechanisms will need to be proportionate and legally robust.	General amendments and streamlining have been undertaken on the policy.

Hellingly Parish Council • Neutral. Suggests testing a number of homes per development using thermography readings to verify performance.	• Comments noted. These matters will be secured by planning conditions as necessary.	No direct change to CC3 required
Chiddingly Parish Council • Supports CC3 but seeks solar PV installations as a standard requirement on all new residential and industrial buildings to reduce pressure for solar farms on greenfield land.	• Comments noted. It is not conisdered appropraite to determine that all new development should incorporate PVs. The policy is designed to not be as prescriptive as that.	General amendments and streamlining have been undertaken on the policy.
Uckfield Town Council • Supports embedding sustainability into new developments, noting this is cheaper and easier than retrofitting. Policies should set minimum expectations and encourage best practice.	• Support noted.	No action required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Trafalgar Group Limited • Objects. Considers requirement for Homes Quality Mark or agreed alternative unsound due to overlap with national requirements. Requests clarification on viability impacts.	• Comments noted. Requirements for accreditation and any implications for viability have been reviewed.	General amendments and streamlining have been undertaken on the policy.
Grosvenor Property UK Limited • Supports CC3 but requests flexibility in meeting BREEAM 'Excellent' and 4 Star Home Quality Mark	• Support and request for flexibility noted.	Flexibility is allowed in the policy wording'.

requirements in exceptional circumstances such as viability.		
Hertfordshire Holdings • Objects. Considers SS8, CC1 and CC3 wordy, onerous, inflexible and inconsistent with national standards delivered through Building Regulations. Requests a simpler approach aligned with the Ministerial Statement on Planning.	• Comments noted. Policy wording has been reviewedy.	General amendments and streamlining have been undertaken on the policy.
Persimmon Homes South East • Objects. Raises concerns that CIBSE overheating and HQM requirements differ from national guidance, and that standards above Building Regulations should be expressed as a percentage of target emission rate and assessed using SAP.	• Comments noted. The relationship between local standards, Building Regulations and national guidance have been reviewed.	General amendments and streamlining have been undertaken on the policy.
Terra Strategic • Objects. Considers the policy onerous and unsound. Suggests requiring final certificates as a planning obligation is excessive and that compliance should instead be through a sustainability statement.	• Comments noted. The mechanism for demonstrating compliance has been checked for proportionality and enforceability.	General amendments and streamlining have been undertaken on the policy..
Real Select Ltd • Objects. Considers control over local materials unachievable, immeasurable and unenforceable. Suggests mechanical ventilation with heat recovery should sit above passive ventilation.	• Comments noted. Wording on local materials and ventilation has been reviewed to ensure it is practicable and enforceable.	General amendments and streamlining have been undertaken on the policy.

Gladman Developments Limited • Supports sustainable design principles but objects to costly accreditation schemes being required to demonstrate policy compliance.	• Comments noted.	General amendments and streamlining have been undertaken on the policy.
Taylor Wimpey UK Ltd • Objects. Considers there is no supporting evidence, duplication with other policies and Building Regulations, conflict with CC1 and costly design requirements not considered in the viability assessment. Requests removal of CC3.	• Comments noted. Evidence, viability and consistency with national policy have been reviewed. Reviewed evidence base, viability evidence and relationship with CC1/Building Regulations.	General amendments and streamlining have been undertaken on the policy.
Home Builders Federation • Objects to paragraph 5.54 requiring HQM or alternative certification. Recommends paragraphs 5.53, 5.54 and 5.55 are deleted and that developers submit a sustainability statement instead.	• Comments noted. Certification requirements and supporting text have been reviewed to ensure they are justified and proportionate.	Supporting text to the policy has been reviewed and streamlined where relevant.
Hyde Housing Association • Objects. Considers sustainable design requirements should be robust without costly and not widely recognised HQM accreditation.	• Comments noted. The approach to accreditation has been reviewed.	General amendments and streamlining have been undertaken on the policy.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Dicker Residents Association • Supports CC3 but considers stronger enforcement is needed because homes may be poorly designed,	• Support noted. Implementation and enforcement concerns are acknowledged.	General amendments and streamlining have been undertaken on the policy and the supporting text.

constructed and finished despite appearing compliant on paper.		
Conservators of Ashdown Forest • Neutral. Seeks clearer definitions and mapping of wildlife corridors and stepping stones, with exclusion and impact zones around designated sites such as SPAs, SACs and Ramsar sites.	• Comments noted. .	General amendments and streamlining have been undertaken on the policy and the supporting text
Clarity Ecoworks • Supports CC3.	• Support noted.	No action required.
The Working Group Against Over Development and CPRE Sussex • Supports reuse but not at the expense of redeveloping town centres with higher-density homes, recognising the tension between embodied carbon, operational carbon and avoiding greenfield development.	• Comments noted. The policy seeks to encourage sustainable design while balancing wider spatial strategy considerations.	No direct change to CC3 required.
Sussex Wildlife Trust • Supports CC3, particularly parts 1(d), 1(e), 1(f) and 1(g).	• Support noted.	No action required.
Village Concerns • Supports CC3 but requests grey water recycling is separated from general water recycling. Raises concern that policy requirements have not been implemented in practice, citing demolition of reusable buildings.	• Comments noted.	General amendments and streamlining have been undertaken on the policy and the supporting text

Eastbourne Eco Action Network C.I.C. • Supports CC3 but considers clear pre-application advice should specify what is required, rather than simply encouraging developers.	• Support noted. Clear guidance could assist implementation.	General amendments and streamlining have been undertaken on the policy and the supporting text

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents Local residents raised a range of grouped comments on Policy CC3, including: • Support for stronger controls and enforcement to ensure developers deliver sustainable design and construction in practice. • Support for prioritising reuse of existing buildings, brownfield land and non-viable buildings before greenfield development. • Calls for all new homes to be zero or negative carbon, with developers responsible for retrofitting costs where standards are not met. • Requests for whole-life carbon assessments for significant development, addressing construction, operation and demolition. • Support for stronger biodiversity net gain, green/blue infrastructure, climate adaptation, overheating prevention, flood risk management, SuDS and water efficiency requirements.	• Comments noted. The responses show broad support for sustainable design and construction, alongside concerns about implementation, enforcement, viability and the need for clear, measurable requirements. Matters such as biodiversity net gain, flood risk, renewable energy, water efficiency, carbon reduction and climate adaptation are relevant to Policy CC3 and wider Local Plan policies. Any changes to CC3 should be proportionate, evidence-based and consistent with national policy.	General amendments and streamlining have been undertaken on the policy and the supporting text. No further specific changes are required to the policy or supporting text

• Support for on-site renewable energy such as solar panels, heat pumps, heat storage tanks and innovative low-carbon technologies. • Concerns about the enforceability of sustainable design requirements, including how breaches will be monitored and addressed. • Comments that sustainability statements should apply to all new homes, not just developments of five or more dwellings. • Suggestions to use local materials and local craftspeople, retain topsoil, protect and replace trees, consider odour impacts and improve accountability for water supply resilience. • Some objection comments, including that reuse of existing buildings may be overemphasised, EV charging should be provided for all homes, and district heating should be considered.		

Policy CC4: Carbon Sequestration

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 102	**Support:** 82	**Neutral:** 6	**Object:** 14

Policy CC4: Carbon Sequestration		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Supports Policy CC4 and its nature-based approach to carbon sequestration.	• Support noted.	No change required.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tunbridge Wells Borough Council • Supports Policy CC4, but asks that carbon storage measures align with and respect the existing natural environment.	• Comments noted. The policy will operate alongside biodiversity, landscape and natural environment policies to avoid adverse effects on existing environmental assets.	General amendments and streamlining of the policy and supporting text have been undertaken. The supporting text acknowledges the relationship with the natural environment.
Eastbourne Borough Council • Supports Policy CC4 and nature-based carbon sequestration, while noting that emissions reduction should be prioritised over offsetting.	• Support noted. The Plan prioritises reducing emissions and Policy CC4 provides an additional mechanism for enhancing carbon sequestration.	No change required.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**

Mayfield and Five Ashes Parish Council • Supports Policy CC4 but considers "seek to" weakens the policy. • Requests clearer quantified measures for soil health, biodiversity net gain and carbon storage.	• Comments noted. The wording and monitoring approach has been reviewed alongside evidence from the Climate Change Mitigation and Adaptation Study.	General amendments and streamlining of the policy and supporting text have been undertaken.
Heathfield & Waldron Parish Council • Supports Policy CC4 but considers "significant" too vague. • Seeks further detail following the Climate Change Mitigation and Adaptation Study. • Requests protection against unnecessary pre-development tree felling.	• Comments noted. The Council have considered whether clearer thresholds and additional supporting text are justified by the evidence base.	General amendments and streamlining of the policy and supporting text have been undertaken
East Hoathly with Halland Parish Council • Neutral response referring to green roofs, living walls, urban forestry, soil management and preserving natural landscapes.	• Comments noted. These measures are broadly consistent with the policy's objectives and are be considered alongside wider design, green infrastructure and biodiversity policies.	General amendments and streamlining of the policy and supporting text have been undertaken.
Rotherfield Parish Council • Supports Policy CC4 and provided no detailed commentary.	• Support noted.	No change required.
Polegate Town Council • Supports Policy CC4 and provided no detailed commentary.	• Support noted.	No change required.

Laughton Parish Council • Supports Policy CC4 and provided no detailed commentary.	• Support noted.	No change required.
Horam Parish Council • Supports Policy CC4 and provided no detailed commentary.	• Support noted.	No change required.
Withyham Parish Council • Supports Policy CC4 and provided no detailed commentary.	• Support noted.	No change required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Grosvenor Property UK Limited • Objects that "carbon store" is undefined, making the policy ambiguous. • Queries whether Policy CC4 duplicates biodiversity policies and should be combined with them.	• Comments noted. Further clarity on the relationship with biodiversity policy has been considered.	General amendments and streamlining of the policy and supporting text have been undertaken.
Hertfordshire Holdings • Objects that Policy CC4 is too complex, rigid and unlikely to be practical or effective.	• Comments noted. The policy has been reviewed to ensure it is clear, proportionate and capable of effective implementation.	Policy wording and supporting text has been reviewed for clarity and proportionality.
Persimmon Homes South East • Objects that Policy CC4 lacks an evidence base and is still in its infancy. • Requests reference to biodiversity net gain and its role in carbon sequestration.	• Comments noted. The policy has been informed by the Climate Change Mitigation and Adaptation	General amendments and streamlining of the policy and supporting text have been undertaken.

	Study and the relationship with BNG should be made clearer.	
Home Builders Federation • Objects that CC4 does not explain how carbon stores will be identified or whether further developer assessments are required. • Requests clarification of the link with BNG.	• Comments noted. The policy provides sufficient clarity for applicants and decision-makers on identification of carbon stores and how BNG contributes.	General amendments and streamlining of the policy and supporting text have been undertaken.
Nevill Estate Company and Hop Farm Real Estate Limited (• Object due to the lack of a statutory metric for calculating carbon gain/loss for habitats beyond recognised woodland and peatland codes.	• Comments noted. The availability and robustness of measurement tools have been considered through the supporting evidence base.	General amendments and streamlining of the policy and supporting text have been undertaken. This includes matters of implementation
Taylor Wimpey UK Ltd • Objects that Policy CC4 is unsupported by evidence and may undermine delivery and housing objectives. • Questions how carbon stores and net gains would be identified and measured. • Considers the policy is not justified, effective or consistent with national policy and should be removed.	• Comments noted. The Council has reviewed the policy against the evidence base, delivery implications and soundness tests.	General amendments and streamlining of the policy and supporting text have been undertaken. This includes matters of implementation.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Village Concerns • Supports Policy CC4 but seeks stronger guidance on off-site mitigation, distance from	• Comments noted. The practical delivery, monitoring and enforceability of mitigation measures	General amendments and streamlining of the policy and supporting text have been undertaken. This includes matters of implementation.

development, long-term viability, funding and monitoring. • Requests 5-yearly audits for 30 years and consideration of lost carbon capture from agricultural land converted to housing.	has been reviewed through the policy and supporting text.	
Clarity Ecoworks • Objects and requests pre-construction surveys to measure topsoil depth, with replacement topsoil matching original depths for gardens and verges.	• Comments noted. Soil carbon and soil management considerations have been reviewed alongside evidence on carbon stores and development impacts.	General amendments and streamlining of the policy and supporting text have been undertaken.
The Working Group Against Over Development and CPRE Sussex • Support Policy CC4 but request clear, measurable standards and warn that development cannot fully restore soil health or carbon stores unless large areas remain undeveloped.	• Comments noted. The need for measurable and deliverable standards will be considered through further policy refinement.	General amendments and streamlining of the policy and supporting text have been undertaken. This includes matters of implementation.
Uckfield Community Technology College • Neutral response seeking greater protection for undisturbed soils, regenerating woodland, organic soils and hay meadows due to their carbon storage role.	• Comments noted. Protection of sensitive habitats and soils have been considered alongside natural environment policies and relevant evidence.	General amendments and streamlining of the policy and supporting text have been undertaken.
Eastbourne Eco Action Network C.I.C. • Supports Policy CC4 and seeks higher levels of tree planting where possible to offset development.	• Support noted. Tree planting opportunities are supported where appropriate and consistent with	No change required.

	wider landscape and ecological objectives.	
Sussex Wildlife Trust • Supports Policy CC4.	• Support noted.	No change required.
Dicker Residents Association • Supports Policy CC4 but considers strong enforcement essential.	• Support noted. The policy is capable of effective implementation and enforcement through the planning process.	Consider supporting text on General amendments and streamlining of the policy and supporting text have been undertaken. This includes matters of implementation.

Local Residents	**WDC Response**	**Changes made to policy/chapter**
Local Residents – Support (20) • Support Policy CC4 without detailed comments.	• Support noted.	No change required.
Local Residents – Support with comments (46) • Seek green/blue infrastructure, parks, orchards, tree planting and long-term monitoring/management. • Request stronger coverage of soil carbon, regenerative agriculture, peatland restoration, blue carbon habitats and biodiversity links. • Seek measurable sequestration targets, monitoring and reporting, community/landowner involvement and incentives.	• Comments noted. The policy and supporting text have been reviewed to ensure that carbon sequestration, biodiversity, green infrastructure, soil management, monitoring and long-term management are appropriately addressed and capable of implementation.	General amendments and streamlining of the policy and supporting text have been undertaken. This includes matters of implementation.

• Raise concern that greenfield development, loss of trees/hedgerows and reduced soil carbon will conflict with carbon sequestration objectives. • Request legally binding compensation/mitigation for lost sequestration and long-term funding/enforcement.		
Local Residents – Neutral (4) • Raise issues around water storage/reservoir capacity and use of underground tanks. • Refer to the role of nature-based solutions, peatlands, forests and damaged habitats in carbon storage. • State that the Sustainability Appraisal lacks detailed mapping/quantification of carbon storage, including ancient woodland and areas affected by proposed infrastructure. • Suggest supporting text should recognise carbon release from greenfield development and removal of hedgerows/trees.	• Comments noted. Matters relating to carbon storage mapping, habitat carbon, greenfield impacts and supporting evidence have been reviewed alongside the wider evidence base. Water infrastructure matters are addressed through relevant infrastructure and water policies.	General amendments and streamlining of the policy and supporting text have been undertaken. This includes matters of implementation.
Local Residents – Object (6) • Object that all greenfield sites should be assumed to store carbon and that developers should mitigate construction impacts. • Raise concerns about topsoil removal, lack of statutory carbon gain/loss metrics and loss of carbon stores through tree, hedge and pasture loss. • One response rejects net zero/carbon storage policy in principle.	• Objections noted. The policy has been reviewed against the evidence base, national policy and deliverability considerations, including carbon store identification, soil impacts and the availability of appropriate assessment metrics.	General amendments and streamlining of the policy and supporting text have been undertaken. This includes matters of implementation.

• Some consider CC4 should go further and provide clearer mechanisms for how the Council will address carbon sequestration.		

Policy CC5: Renewable and Low-Carbon Energy

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 106	**Support:** 94	**Neutral:** 3	**Object:** 9

Policy CC5: Renewable and Low-Carbon Energy		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Supports Policy CC5 but requests stronger wording in criterion 1(a) so that significant adverse impacts on the local environment, including landscape character, are avoided or fully satisfactorily mitigated.	• Comments noted. The suggested wording has been considered to ensure the policy reflects the avoid, mitigate, compensate hierarchy and provides sufficient protection for landscape and environmental interests.	Minor wording amendment and restructuring has been undertaken to the policy and supporting text. There are clear linkages to avoid significant adverse impacts.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
No comments received.	n/a.	n/a.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council	• Comments noted. The Local Plan provides a positive policy framework for renewable	No action required.

• Supports Policy CC5 but suggests Chapter 14 should include annual targets for installed megawatts from commercial-scale renewable energy schemes.	and low-carbon energy proposals. It is not considered appropriate to add annual installed capacity targets to the Plan.	
Polegate Town Council • Supports Policy CC5, noting that solar farms can provide long-term renewable energy and prevent other development, although land use may be limited mainly to grazing.	• Support noted. The policy seeks to enable renewable energy while managing landscape, environmental and land-use impacts.	No action required.
Rotherfield Parish Council • Supports Policy CC5 and considers renewable energy important for net zero, while noting constraints associated with the High Weald National Landscape and onshore wind.	• Support noted. The policy balances renewable energy delivery with landscape and environmental considerations.	No action required.
Heathfield & Waldron Parish Council • Supports solar farms, wind generation and anaerobic digestion, but requests that Policy CC5 1(a) also protect existing residents in the locality.	• Comments noted. Residential amenity is an important planning consideration and wording now appears within the plan policy.	Minor amendments and restructuring of part 1 of the policy. Residential amenity is now drawn out in part c of the policy
Laughton Parish Council • Supports Policy CC5 and welcomes the Clean Energy Opportunities and Implications Study. Requests consideration of all	• Comments noted. The clean energy evidence base will consider opportunities for renewable and low-carbon energy. Matters relating to district heat networks	Minor wording amendment and restructuring has been undertaken to the policy and supporting text.

renewable energy forms, community energy projects and district heat networks for smaller housing developments.	have been considered where relevant to the Plan's wider climate change policies.	
Horam Parish Council • Supports Policy CC5.	• Support noted.	No action required.
Withyham Parish Council • Supports Policy CC5 and requests further consideration of offshore wind farms and other renewable technologies.	• Comments noted. The Local Plan supports appropriate forms of renewable and low-carbon energy within the District, subject to relevant planning considerations.	No action required.
East Hoathly with Halland Parish Council • Neutral. New development should incorporate renewable energy from the outset and assess potential impacts on existing buildings' renewable energy supplies.	• Comments noted. Requirements for sustainable design and renewable energy in new development are addressed through the Plan's climate change policies and will be considered alongside Policy CC5.	Consider through wider climate change policy wording within the Chapter and its supporting text.
Isfield Parish Council • Supports Policy CC5 but raises concerns about the loss of agricultural land, food production impacts, reversion of solar farm land to agriculture and the need for full public consultation.	• Comments noted. The policy already seeks to manage environmental and land-use impacts. The need for reversion provisions and consultation expectations has been considered where appropriate.	Minor wording amendments and restructuring has been undertaken to the policy and supporting text.

Chalvington with Ripe Parish Council • Supports Policy CC5 subject to stronger consideration of cumulative adverse impacts from solar farms and associated infrastructure on the Low Weald landscape.	• Comments noted. Cumulative landscape impact is an important consideration for renewable energy proposals and has been considered through policy criteria and evidence.	Minor wording amendments and restructuring has been undertaken to the policy and supporting text.
Uckfield Town Council • Supports Policy CC5. Queries whether the Gridserve proposal is referenced and suggests considering opportunities to harness power from rivers.	• Comments noted. The policy provides broad support for appropriate renewable and low-carbon energy schemes. Specific technologies and projects have been considered where supported by evidence.	No immediate policy change identified.
Chiddingly Parish Council • Supports Policy CC5 provided productive agricultural land is not removed from use. Requests solar PV on all new residential and industrial buildings to reduce pressure for greenfield solar farms.	• Comments noted. The policy seeks to manage agricultural land impacts. Rooftop solar and sustainable construction matters have been considered through wider climate change policies.	Consider through the wider climate change chapter policy wording/supporting text.
Hellingly Parish Council • Neutral. Requests stronger requirements for developments over 15 homes to install heat pumps, solar panels, wind turbines and EV charging points.	• Comments noted. Requirements for low-carbon technologies in new development are considered through the Plan's wider climate change policies and viability considerations.	Consider through the wider climate change chapter policy wording/supporting text.
Other Consultee Bodies and Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Village Concerns	• Support noted. Agricultural land quality and site suitability are relevant	No action required.

• Supports Policy CC5. Notes East Hoathly already has a solar farm and could support further facilities where higher-grade agricultural land is avoided.	considerations for renewable energy proposals.	
Eastbourne Eco Action Network C.I.C. • Supports Policy CC5.	• Support noted.	No action required.
The Working Group Against Over Development and CPRE Sussex • Support the policy but consider it misses opportunities for rooftop solar, particularly on car parks. Raise concerns about impacts on food production, loss of agricultural land and the need for enforceable reversion provisions.	• Comments noted. Rooftop and brownfield solar opportunities, agricultural land impacts and restoration/reversion requirements have been considered through policy wording and supporting text.	Minor wording amendments and restructuring has been undertaken to the policy and supporting text.
Dicker Residents Association • Supports Policy CC5 but considers solar farms and pylons visually harmful. Suggests solar panels and storage batteries on buildings would reduce the need for solar farms.	• Comments noted. Visual and landscape impacts are already relevant considerations. Building-integrated renewable energy is addressed through the wider climate change policy framework.	Consider through wider climate change chapter policy wording/supporting text.
Grosvenor Property UK Limited • Supports Policy CC5.	• Support noted.	No action required.
Green Transition Crowborough	• Comments noted. The Council have considered evidence on landscape	Consider through evidence base; no immediate wording change identified.

• Does not support Policy CC5. Supports proactive work with communities to identify suitable wind and solar sites but rejects the Landscape Sensitivity Assessment conclusion that the north is unsuitable, arguing climate action should be prioritised.	sensitivity and renewable energy opportunities through the clean energy evidence base and plan-making process.	
Statkraft UK Ltd • Does not support Policy CC5 as drafted. Identifies incorrect NPPF references, welcomes the Clean Energy Opportunities and Implications Study, supports flexibility in applying criteria, seeks greater flexibility for continued agricultural use and energy storage, and supports identifying suitable areas for renewable energy without making this the only route for delivery.	• Comments noted. NPPF references have been checked. The policy approach and energy storage criteria will be reviewed to ensure appropriate flexibility and consistency with national policy, including the ability to consider proposals on their merits.	Minor wording amendments and restructuring has been undertaken to the policy and supporting text. NPPF references have been checked.
Clarity Ecoworks • Supports Policy CC5.	• Support noted.	No action required.
Uckfield Community Technology College • Neutral. Provides community-led feedback and states that solar on every new roof is important.	• Comments noted. Rooftop solar requirements are considered through the wider climate change policy framework for new development.	Consider through wider climate change chapter policy wording/supporting text.

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents **Support:** 75 residents supported Policy CC5, including 65 who provided comments. Key issues raised included: • Renewable energy is important for climate targets, energy security and the local economy, but schemes should avoid unacceptable harm to residents, landscape character, biodiversity, agricultural land and food production. • Strong support for rooftop solar on new buildings, existing suitable buildings, schools, Council-owned buildings, commercial premises, car parks and brownfield land before greenfield solar. • Support for identifying suitable areas for solar farms and onshore wind, with community consultation, landscape sensitivity assessment and consideration of grid capacity. • Solar farms should include biodiversity benefits, allow continued grazing where possible and include enforceable reversion provisions so land can return to agriculture or its natural state.	• Comments noted. The policy seeks to support renewable and low-carbon energy while ensuring that proposals are appropriately assessed against landscape, environmental, amenity and agricultural land considerations. The Local Plan's wider climate change policies address renewable energy requirements in new development. The Council will consider whether the policy and supporting text should place greater emphasis on rooftop/brownfield solar, cumulative landscape impacts, community engagement, biodiversity benefits and land restoration/reversion.	Minor wording amendments and restructuring has been undertaken to the policy and supporting text. No further comments made that would result in direct changes to the policy wording or supporting text.

• Some residents suggested wider renewable opportunities, including wind turbines, offshore wind, hydro/water generation, solar on bus stops and discounted energy for nearby communities. **Object:** 7 residents objected or raised objections. Key issues included: • Solar and wind farms should be excluded from the AONB/High Weald National Landscape and greater protection should be given to the High and Low Weald landscapes. • Concern that solar farms are visually harmful, remove agricultural land from food production, rely on subsidy and have embedded carbon and recycling impacts. • Requests that solar farms be discouraged or limited to buildings, with stronger requirements for solar panels on new buildings at design stage. • Some residents considered that CC5 should be removed, leaving individuals to decide whether renewable systems are economically viable.		

Policy CC6: Water Efficiency

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 105	**Support:** 92	**Neutral:** 7	**Object:** 6

Policy CC6: Water Efficiency		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Supports Policy CC6, noting that Wealden is in a water-stressed area and supporting the optional 110 litres per person per day standard, alongside water reuse, recycling and rainwater harvesting.	• Support noted. The Council recognises the need for higher water efficiency standards in water-stressed areas and will continue to encourage water reuse, recycling and rainwater harvesting through Policy CC6.	No change required.
South East Water Ltd • Supports Policy CC6 and highlights the need to reduce household consumption, use smart metering and deliver water efficiency through collaboration, future standards, water labelling and wider national initiatives. Advises monitoring the Future Home Hub "Water	• Comments noted. The Council will continue to work with statutory water providers and monitor emerging national guidance, including any future changes relating to water-positive development and resilience to supply interruptions.	Minor updates have been made to supporting text to reference monitoring of emerging guidance and water resilience measures.

Ready" report and exploring 24-hour water storage for new homes.		
Environment Agency • Supports Policy CC6 and notes that the NPPF requires strategic policies to make sufficient provision for water supply, wastewater infrastructure and flood risk management. Suggests that a water study cycle could provide further evidence for the draft Local Plan policies.	• Support and advice noted. Evidence relating to water resources, wastewater infrastructure and flood risk will continue to inform the preparation of the Local Plan, including the publication of the Water Cycle Study	No policy change required.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
No comments received.	n/a.	n/a.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Polegate Town Council • Supports Policy CC6 but seeks increased water collection and supply capacity, including a new reservoir. Raises concerns about insufficient water supply, summer hosepipe bans and the need to consider existing approved applications before further development.	• Comments noted. The Local Plan can require water-efficient development, but strategic water infrastructure provision is primarily planned and delivered by the relevant water companies and infrastructure providers. The Council will continue to engage with providers through the plan-making process.	No direct policy change required.
Laughton Parish Council	• Support noted.	No change required.

• Supports the mandatory higher standard of 110 litres per person per day because Wealden is an area of serious water stress.		
Rotherfield Parish Council • Supports the mandatory higher standard of 110 litres per person per day because Wealden is an area of serious water stress.	• Support noted.	No change required.
Horam Parish Council • Supports Policy CC6.	• Support noted.	No change required.
Withyham Parish Council • Supports Policy CC6 and asks that water supplies in developments are considered, alongside local authority cooperation to clean watercourses for industry and communities.	• Support noted. Policy CC6 addresses water efficiency in new development. Wider watercourse maintenance and management will continue to be considered through relevant infrastructure, flood risk and environmental processes.	No direct policy change required.
Heathfield & Waldron Parish Council • Supports Policy CC6 and suggests that if development cannot achieve a reduction from the Building Regulation standard of 125 litres per person per day, development should be constrained due to water stress. Suggests amending paragraph 5.82.	• Support and suggested amendment noted. The policy seeks to secure the optional higher standard in recognition of water stress. The wording of the supporting text has been reviewed to ensure the policy requirement is clear.	No direct policy change required.

Mayfield and Five Ashes Parish Council • Supports Policy CC6 but asks for quantified year-by-year targets for per capita water consumption during the monitoring period.	• Support noted. Monitoring indicators have been considered through the Local Plan monitoring framework, although per capita consumption targets are also influenced by water company planning and national regulation.	Updates to the monitoring framework.
Willingdon and Jevington Parish Council • Neutral. Raises the need for a reservoir in the Willingdon/Polegate/Eastbourne area, concerns about long timescales for reservoir improvements, preservation and maintenance of ditches, and lack of updated sewage and wastewater management to serve new growth.	• Comments noted. Strategic reservoir provision and wastewater infrastructure are matters for the relevant infrastructure providers, informed by Local Plan growth. The Council will continue to engage with providers and consider drainage and wastewater matters through the wider plan-making and development management processes.	No direct policy change required.
Hellingly Parish Council • Neutral. Suggests that developments of more than 30 homes should have a legally binding statement from the Water Authority confirming that services can accommodate the increased level of distribution.	• Comment noted. The Council will continue to consult infrastructure providers on relevant development proposals and through Local Plan preparation. The suggestion made is outside the scope of the Local Plan.	No direct policy change required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**

Trafalgar Group Limited • Neutral. Considers CC6 criterion 1 unnecessary and suggests rewording it so applicants demonstrate through a Sustainability Statement or Design and Access Statement that criteria 2 and 3 can be achieved.	• Comment noted. The policy wording has been reviewed to ensure it is clear and proportionate.	General amendments and restructuring of the policy has been undertaken.
Hertfordshire Holdings • Objects to Policy CC6, stating it is largely unnecessary because the required approach is compliance with Building Regulations.	• Comment noted. Given Wealden's water-stressed context, the Council considers it appropriate for the Local Plan to set out local expectations for water efficiency, including use of the optional higher standard.	No change required.
Home Builders Federation • Objects to Policy CC6. Considers criterion 1 unnecessary and potentially open-ended if development meets criteria 2 and 3. Suggests wording requiring applicants to demonstrate compliance through a Sustainability Statement or Design and Access Statement.	• Comment noted. The policy wording has been reviewed to ensure it is clear and proportionate.	General amendments and restructuring of the policy have been undertaken.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Dicker Residents Association • Supports Policy CC6 but asks that the latest climate change evidence and future modelling	• Comments noted. The Local Plan evidence base will continue to be updated where necessary. Policy CC6 supports water reuse and	No direct policy change required.

are used. Suggests separating brown water from sewage through dual drainage systems in new buildings to enable reuse.	recycling, although detailed drainage and wastewater systems will also need to comply with wider technical and regulatory requirements.	
The Working Group Against Over Development • Supports Policy CC6 but considers that the phrase "wherever possible" in relation to reuse and recycling could create a loophole, particularly in retrofit or refurbishment schemes where viability arguments may be used.	• Comment noted. The wording has been reviewed to ensure the policy provides sufficient clarity and avoids unintended weakening of water reuse and recycling requirements.	Policy wording has been strengthened.
CPRE Sussex • Supports Policy CC6 but considers that the phrase "wherever possible" in relation to reuse and recycling could create a loophole, particularly in retrofit or refurbishment schemes where viability arguments may be used.	• Comment noted. The wording has been reviewed to ensure the policy provides sufficient clarity and avoids unintended weakening of water reuse and recycling requirements.	Policy wording has been strengthened .
Sussex Wildlife Trust • Supports Policy CC6 and suggests criterion 3 should be set as a minimum standard to allow greater water efficiency savings where possible, noting further efficiencies may be possible during the plan period.	• Support and suggested clarification noted. The Council have reviewed whether the wording should make clear that the standard is a minimum where higher levels of efficiency can be achieved.	General amendments and restructuring of the policy have been undertaken.

Willingdon Residents' Association • Neutral. Raises concerns about water shortages and reservoir provision, including the need for a further reservoir in the Willingdon/Polegate/Eastbourne area and concerns about long timescales for reservoir improvements.	• Comments noted. Strategic reservoir delivery is outside the direct scope of Policy CC6, but engagement with water companies and infrastructure providers will continue to inform the Local Plan.	No direct policy change required.
Friends of the South Downs • Supports Policy CC6. Highlights the importance of the Downs aquifer and the ecological sensitivity of chalk streams around Wannock and Willingdon, including risks from excessive abstraction and low water tables.	• Support noted. The policy's focus on reducing demand for water is consistent with protecting water resources and associated ecological interests. Other Local Plan policies address biodiversity and environmental protection.	No change required.
Village Concerns • Supports Policy CC6 and asks that grey water recycling is included, as covered in Policy CC3.	• Comment noted. The policy wording and supporting text has been reviewed to ensure appropriate cross-reference to grey water recycling and consistency with Policy CC3.	General amendments and restructuring of the policy have been undertaken.
Uckfield Community Technology College • Neutral. Raises concerns about groundwater supplies, water stress, inadequate reservoirs, water shortages, hosepipe bans and impacts	• Comments noted. The Local Plan will continue to engage with water infrastructure providers. Policy CC6 seeks to reduce water demand from new development, while strategic	No direct policy change required.

on Wadhurst and farmers. Asks that the plan addresses these issues and brings reservoirs forward to meet growth needs.	reservoir provision is led by the relevant water companies and regulators.	

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents **Total 80 support, 4 object and neutral comments received.** • Support for Policy CC6, particularly stronger requirements for water efficiency, rainwater harvesting, grey water recycling and reduced pressure on existing water infrastructure. • Concerns that water efficiency should be more clearly linked to climate change adaptation, drought resilience, water-sensitive urban design, green infrastructure and water-efficient landscaping. • Concerns that South East Water and Southern Water infrastructure is already under pressure, with hosepipe bans, flooding from diverted watercourses, inadequate reservoirs and insufficient water supply/storage capacity. • Requests for new homes to include rainwater collection, water butts, underground tanks, self-contained sewage/reed bed systems and mandatory grey water collection/reuse.	• Comments noted. The Council recognises that Wealden is an area of serious water stress and that new development must minimise water demand. Policy CC6 seeks to secure higher water efficiency standards, including water reuse, recycling and rainwater harvesting where appropriate. Wider issues regarding reservoir provision, strategic water supply, wastewater infrastructure and long-term water company investment will continue to be addressed through engagement with infrastructure providers and the wider Local Plan evidence base. Although a number of hthe points raised are outside the remit of what can be achieved through a local plan. Matters relating to	General amendments and restructuring of the policy have been undertaken.

• Concerns about impacts on groundwater, private wells, water tables and adjoining private water sources, which should be assessed before development is approved. • Requests for development to be refused or constrained where water companies cannot demonstrate sufficient water supply, wastewater capacity or infrastructure upgrades. • Neutral comments included concerns about the lack of new reservoirs, opportunities for underground water tanks and how South East Water's longer-term 80 litres/person/day target will be achieved. • Objections argued that restricting water use in new builds is insufficient, that development should be halted where water infrastructure is inadequate, and that the carbon implications of water reuse and recycling systems should be assessed.	groundwater, flood risk, drainage, biodiversity and climate resilience will also be considered through relevant Local Plan policies and development management processes.	

Policy CC7: Managing Flood Risk

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 111	**Support:** 84	**Neutral:** 4	**Object:** 23

Policy CC7: Managing Flood Risk		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Supports Policy CC7 and the related policies as a comprehensive approach to managing flood risk. Requests clearer wording so all development, irrespective of location, does not cause or exacerbate flood risk on or off site. Also suggests avoiding unnecessary duplication between policy wording and the SFRA/sequential and exception tests.	• Comments noted. The policy amendments are clear that flood risk must not be increased by any development, not just development in Flood Zone 3b. References to the SFRA should be proportionate and avoid relying on guidance that may be updated.	Amended policy to apply the no increase/no exacerbation of flood risk requirement to all development (New Part 2 of the policy). Other amendments to strengthen and streamline the policy and supporting text have been made.
Southern Water • Supports the overall intention of Policy CC7, particularly the priority given to natural flood management and SuDS. Requests stronger requirements to avoid surface water entering the wastewater network, noting pressure on	• Comments noted. The policy already supports SuDS and natural flood management, but the relationship with wastewater infrastructure and surface water discharge has been	• Updated supporting text/policy wording to strengthen early consideration of surface water drainage. There is no standalone requirement to prohibit all

drainage networks and the need to manage surface water close to source.	considered alongside Policy CC6 and national requirements.	wastewater network discharge unless supported by legislation.
Pevensey and Cuckmere Water Level Management Board • Supports Policy CC7 but requests that the requirement not to increase flood risk applies to development in any location. Requests reference to the Cuckmere catchment, clarification of SFRA status, and signposting to relevant byelaws and consents for development near watercourses.	• Comments noted. The policy has been amended to cover all development and refers to catchment-level considerations where relevant.	Amended policy/supporting text to refer to all developments as well as reference to the Cuckmere catchment.
Environment Agency • Supports Policy CC7 but raises several detailed points, including wastewater and water supply evidence, tidal/coastal flood risk at Pevensey Bay and Levels, incorrect references to CC6, EA consultation where land raising is proposed, reliance on existing flood defences, developer contributions, and the need to secure Flood Risk Activity Permits and ordinary watercourse consents.	• Comments noted. Supporting text has been updated to correct references, acknowledge tidal/coastal flood risk, clarify expectations on land raising and flood defences, and signpost relevant permitting and consenting requirements.	General amendments and streamlining have been made the policy and supporting text, including reference to all flood risk, and advice on land raising.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Rother District Council	• Comments noted. Continued cross-boundary engagement is supported.	No direct change required to the policy.

• Supports Policy CC7 and continued joint working on sustainable drainage and shared evidence. Also supports joint working on Coastal Change Management Areas around Pevensey/Normans Bay.	Coastal change is relevant to wider plan preparation.	
Tunbridge Wells Borough Council • Supports Policy CC7 but suggests changing "lead flood authority" to "authorities" to reflect potential cross-boundary issues involving more than one County Council.	• Comments noted.	General amendments and streamlining have been made the policy and supporting text.
Eastbourne Borough Council • Supports Policy CC7 and notes significant flood risk issues in Eastbourne and south Wealden, including joint flood risk work. Requests consideration of floodplain compensation and cumulative downstream impacts, including potential links to Eastbourne Park Flood Storage Scheme.	• Comments noted. The policy will ensure mitigation does not increase flood risk elsewhere and that cumulative downstream impacts are considered where relevant.	General amendments and streamlining have been made the policy and supporting text
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Uckfield Town Council • Does not support Policy CC7 as drafted. Requests stronger links to local knowledge, climate change, upstream/downstream impacts, bridge capacity, reduction of existing flood risk, robust long-term maintenance of mitigation,	• Comments noted. The policy and supporting text will acknowledge local conditions, climate change, maintenance, and the need to avoid increasing flood risk downstream.	General amendments and streamlining have been made the policy and supporting text

protection of agricultural land, and regular updates to climate and flood risk evidence.		
Laughton Parish Council • Supports Policy CC7 but considers Part 6 insufficiently clear and firm. Raises issues with recent flooding in areas such as Hellingly, absence of a functional floodplain map, and supports green/blue corridors through opening culverts.	• Comments noted. The policy will be clear about requirements for flood mitigation and the role of functional floodplain evidence.	General amendments and streamlining have been made the policy and supporting text
Polegate Town Council • Supports Policy CC7 but raises issues with road drainage, gully maintenance, riparian rights, EA maintenance/opening of gates, permeable surfaces, and capturing/recycling water in new developments.	• Comments noted. Some matters relate to maintenance outside the Local Plan, but the policy can support permeable surfaces, SuDS and sustainable water management.	General amendments and streamlining have been made the policy and supporting text
Rotherfield Parish Council • Supports Policy CC7.	• Support noted.	No action required.
Heathfield & Waldron Parish Council • Supports Policy CC7 but requests wider application beyond Flood Zone 3b, deletion of "Where required", and stronger wording to avoid making flood risk worse and reduce existing flood risk where possible.	• Comments noted. The policy will apply to all development where flood risk may be affected and should be clear in its wording.	The policy is clear that is relates to all development proposals. General amendments and streamlining have been made the policy and supporting text.

Horam Parish Council • Supports Policy CC7 but suggests CC7.3 should refer to reducing flood risk within the development and downstream.	• Comments noted.	General amendments and streamlining have been made the policy and supporting text
Withyham Parish Council • Supports Policy CC7 and welcomes the inclusion of managing water through natural methods.	• Support noted.	No action required.
Isfield Parish Council • Supports Policy CC7 but considers that development should not be allowed in areas prone to flooding as mitigation rarely works.	• Comments noted. National policy requires the sequential and exception tests to guide whether development is appropriate in flood risk areas.	No blanket prohibition proposed but retain strong sequential and mitigation requirements.
Chiddingly Parish Council • Supports Policy CC7 but emphasises that development can increase flood risk by covering land with impermeable surfaces, potentially increasing flood risk on lower lying land.	• Comments noted. The policy should continue to require development to manage surface water and avoid increasing flood risk elsewhere.	General amendments and streamlining have been made the policy and supporting text
Hellingly Parish Council • Does not support Policy CC7. States that planning should not be approved on any floodplain and that all SuDS should be independently approved, fit for purpose, and	• Comments noted. National policy does not impose a blanket prohibition on all floodplain development, but the sequential approach and site-specific assessments must be applied. SuDS adoption and maintenance should be	Retain sequential risk-based approach. General amendments and streamlining have been made the policy and supporting text

adopted so residents do not bear service charge costs.	addressed through the relevant mechanisms.	
Pevensey Parish Council • Does not support Policy CC7. Raises concern that the evidence base does not include a sufficiently strategic flood risk assessment for Pevensey and Pevensey Bay to apply the sequential and exception tests at plan level. Requests clarity on whether development within those development boundaries is ruled out or may be acceptable subject to conditions.	• Comments noted. The SFRA evidence reports have been completed to inform the Local Plan.	No action required.
Mayfield and Five Ashes Parish Council • Supports Policy CC7 and has no comments as the policy is not considered relevant to the Parish.	• Support noted.	No action required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Hertfordshire Holdings @ Tor & Co • Does not support Policy CC7. Considers there is no need to repeat national or local guidance, and that shorter, simpler policies should be drafted, with guidance moved to supporting text or validation requirements.	• Comments noted. Amended policy wording is concise and avoids unnecessary duplication, while still providing sufficient clarity for decision-making.	General amendments and streamlining have been made the policy and supporting text
Grosvenor Property UK Limited	• Support noted.	No action required.

• Supports Policy CC7 and does not propose any changes.		
ASP Planning • Does not support Policy CC7. Considers the policy imprecise and unclear, particularly on existing and future flood risk, undefended scenarios, reliance on the SFRA, broadscale modelling, surface water flood extents, and the need for site-specific flood risk assessment.	• Comments noted. The amended policy is on when site-specific flood risk assessment is required and should avoid over-reliance on broadscale SFRA mapping for individual site decisions.	General amendments and streamlining have been made the policy and supporting text. This helps to clarify the role of site-specific FRA and future flood risk,
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
CPRE Sussex • Does not support Policy CC7, considering it less stringent than the current approach because it appears to allow development in Flood Zones 2 or 3a.	• Comments noted. The policy follows a sequential risk-based approach consistent with national policy rather than a blanket prohibition.	No blanket prohibition proposed. Policy clarifies sequential approach and mitigation requirements where appropriate.
The Working Group Against Over Development • Does not support Policy CC7, raising the same concern that it appears less stringent and could permit development in Flood Zones 2 or 3a.	• Comments noted. The policy will be clear that development in areas of flood risk must satisfy national policy tests and not increase flood risk.	General amendments and streamlining have been made the policy and supporting text
Conservators of Ashdown Forest • Neutral. Suggests referencing the value of open spaces, woodland and farmland in managing flood risk, and notes the requirement not to	• Comments noted. The contribution of natural spaces to flood risk management is relevant to the policy and supporting text.	General amendments and streamlining have been made the policy and supporting text

increase flood risk should apply everywhere, not only in Flood Zones.		
Village Concerns • Supports Policy CC7 and provided no written comments.	• Support noted.	No action required.
Willingdon Residents' Association • Supports Policy CC7 but requests that ditches on development land are retained and maintained, particularly at Mornings Mill Farm, to avoid flooding and long-term drainage problems.	• Comments noted. Existing drainage features and maintenance arrangements will be considered through site design and planning application requirements.	General amendments and streamlining have been made the policy and supporting text
Uckfield Community Technology College • Neutral. Raises concern that protection of naturally fluctuating ecosystems is preferable to land raising and engineered solutions. Requests greater caution around river catchments, use of local knowledge, engagement with catchment organisations, and consideration of Catchment Based Approach/Rights of River/Rights of Nature approaches.	• Comments noted. Natural flood management and catchment-level approaches are relevant and are reflected in supporting text where appropriate.	General amendments and streamlining have been made the policy and supporting text
Sussex Wildlife Trust • Supports Policy CC7, particularly parts 6, 7 and 8.	• Support noted.	No action required.

Dicker Residents Association • Neutral. Objects to artificial land raising, considers Council data out of date, requests projection modelling and more recognition of storm events and groundwater flooding across the Cuckmere catchment.	• Comments noted. Site-specific assessment, current evidence and consideration of catchment impacts are important to flood risk decision-making.	General amendments and streamlining have been made the policy and supporting text
Friends of Park Wood Hellingly • Does not support Policy CC7. Refers to Pevensey Levels and marshes and requests dredging of rivers.	• Comments noted. River dredging and wider watercourse maintenance are operational matters outside the direct scope of the Local Plan policy.	No policy change required on dredging. Retain flood risk policy safeguards.

Local Residents	**WDC Response**	**Changes made to policy/chapter**
Local Residents – Support: 53 Supported Policy CC7 without detailed written comments.	Support noted.	No action required.
Local Residents – Support with comments: 11 • Flood risk assessments should include future climate projections and stronger community engagement. • Policy wording should be more mandatory and avoid weak wording such as “consider” and “where possible”. • Development should not increase flood risk downstream and should address impermeable	• Comments noted. The policy will continue to manage existing and future flood risk, require appropriate site-specific assessment, support SuDS/natural flood management, and ensure development does not increase flood risk elsewhere.	General amendments and streamlining have been made the policy and supporting text

surfaces, drainage, SuDS, urban heat, green roofs, permeable paving, water reuse and sustainable transport links. • Concerns raised around Southern Water capacity, Pevensey Levels catchment, building in flood risk areas, and existing built areas at risk of flooding.		
Local Residents – Neutral comments • Flood risk should be considered in all zones because development on higher ground can increase downstream flood risk. • Too much reliance on modelling is considered risky; site observation/local evidence should also be used. • Ditches and storm drains should be considered for rural roads, and infilling of balancing ponds on development sites should be prevented.	• Comments noted. Local evidence, drainage features and downstream impacts are relevant to assessing flood risk and site design.	General amendments and streamlining have been made the policy and supporting text
Local Residents – Object: 15 • Concerns raised about lack of Flood Zone 3b mapping and development on flood plains, marshland and areas with existing flooding. • Requests that the policy reflects Pevensey sea defences and aligns with Eastbourne/Rother approaches. • Concerns about Uckfield, Crowborough, Pevensey Levels pumps, drainage/water supply capacity, sewer flooding, Westham sewerage issues, and infrastructure capacity.	• Comments noted. Many infrastructure and maintenance issues involve other bodies, but the Local Plan should ensure development is supported by appropriate flood risk, drainage and infrastructure evidence and does not increase flood risk.	General amendments and streamlining have been made the policy and supporting text

• Residents consider SuDS may not address groundwater impacts and that impermeable construction materials increase flood risk. • Requests a priced and programmed infrastructure improvement plan from the water company to support development.		

Policy CC8: Sustainable Drainage

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 113	**Support:** 50	**Neutral:** 17	**Object:** 46

Policy CC8: Sustainable Drainage		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Supports Policy CC8 but seeks clarification on discharge rates/volumes, noting that volume reduction is generally only achievable through infiltration, which is not viable across much of the District. Comments also question duplication between criteria 3(a) and 3(f), the meaning of	• Comments noted. The policy wording and supporting text has been reviewed with drainage/flood risk advice to distinguish rate, flow and volume, avoiding unnecessary duplication, clarifying connectivity requirements, and ensure flood risk matters	General amendments and streamlining have been made the policy and supporting text.

drainage connectivity in 3(h), whether 3(i) should sit under flood risk policy CC7, and whether criterion 6 should refer specifically to major development.	were addressed in the most appropriate policy.	
Network Rail • Supports Policy CC8 and requests that drainage from development sites does not adversely affect rail infrastructure, with detailed reports provided where locations are vulnerable to flooding.	• Comment noted. The need to prevent adverse drainage impacts on surrounding infrastructure is consistent with the policy approach.	No specific policy change required
Pevensey and Cuckmere Water Level Management Board • Supports Policy CC8 but raises concerns that discharge volumes cannot generally be reduced without infiltration, which is unlikely to be feasible across much of the District. • Requests that discharge rates are agreed with the LLFA and WLMB, that criterion 3(f) is removed or moved to guidance, and that criterion 3(h) and 3(i) are clarified. • Suggests supporting text requiring developments discharging into the drainage district to agree rates with the Board.	Comments noted. The role of the LLFA/WLMB, the feasibility of infiltration, and the relationship between policy and guidance will be reviewed to ensure the policy is technically accurate and deliverable.	General amendments and streamlining have been made the policy and supporting text.
Natural England	• Comments noted. The support for three-stage treatment and wider nature recovery/climate resilience functions is welcomed.	Retain policy direction; strengthening supporting text on strategic SuDS planning

• Supports Policy CC8, particularly the requirement for SuDS to be integral to development and the three-stage treatment requirement for sites draining to the Pevensey Levels SAC/Ramsar catchment. Welcomes the role of SuDS in climate resilience and nature recovery, and suggests a strategic approach to masterplanning and SuDS around Pevensey.	Opportunities for strategic SuDS planning around Pevensey will be explored with Natural England.	and Pevensey Levels mitigation.
Environment Agency • Supports Policy CC8 and highlights ongoing partnership work with the National Landscape Team in the upper Cuckmere on natural flood management, with an expectation that WDC can help identify areas suitable for safeguarding for future works.	• Comment noted. Natural flood management opportunities are considered alongside wider green infrastructure, biodiversity net gain and flood risk management work.	Strengthen supporting text reference to natural flood management and safeguarding opportunities where appropriate.
Southern Water • Supports the intention of Policy CC8 but seeks flexibility in SuDS design to ensure effective options remain viable. • Requests stronger wording to reduce surface water entering foul/combined sewers, references the drainage hierarchy, raises viability considerations, and proposes amendments to apply drainage provision to all development, revise criterion 3(f), and require three treatment	• Comments noted. The policy continues to support effective surface water management and minimising connections to foul/combined systems, while recognising relevant legislation, Building Regulations and deliverability.	Reviewed wording of Policy CC8 and supporting text on drainage hierarchy, foul/combined sewers, treatment stages and applicability to development types.

stages for development in the Pevensey Levels hydrological catchment.		
Southern Water • Re: Sites HA6, UCK6 and UCK8 - Southern Water's infrastructure crosses the site. An easement width of 6 metres or more, depending on pipe size and depth, would be required,	• This issue has been considered within site assessment. The issue will be addressed further at planning application stage.	No further action required – site allocation/yield takes account of this constraint
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tunbridge Wells Borough Council • Supports Policy CC8 and suggests criterion 6 should refer to lead flood "authorities" to reflect potential cross-boundary issues where more than one County Council may be involved.	• Comment noted.	General amendments and streamlining have been made the policy and supporting text. This policy was presented again in the Focused Draft Local Plan Consultation (February 2026)
Eastbourne Borough Council • Supports the approach in Policy CC8 to minimising and mitigating flood risk in accordance with national planning policy.	• Support noted.	No change required.

Rother District Council • Neutral. Supports continued joint working and consistent policy approaches across boundaries. Notes that Figure 16 appears to show the operational catchment rather than the hydrological catchment, meaning the policy area may currently be shown too widely.	• Comments noted. Continued engagement with neighbouring authorities is supported. Mapping has been updated.	Reviewed and amended catchment mapping to cover the Pevensey Levels hydrological catchment and continue cross-boundary engagement.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Heathfield & Waldron Parish Council • Supports Policy CC8 but requests stronger wording on permanent arrangements for SuDS maintenance, repair and replacement, with details addressed at application stage rather than by condition. Also asks that treatment requirements in criterion 5 are made clearer.	• Comments noted. These comments are consistent with general amendments to the policy. Policy CC8 and should be considered through drainage strategies and application-stage assessment.	No fundamental policy change required.
Polegate Town Council • Supports Policy CC8 and emphasises the need for adequate drainage, double-checking expert advice, maintenance of drainage systems, consideration of riparian issues, permeable surfaces and rainwater harvesting.	• Comments noted. These matters are broadly consistent with the objectives of Policy CC8 and should be considered through drainage strategies and application-stage assessment.	No fundamental policy change required.
• **Horam Parish Council** • Supports Policy CC8.	• Support noted.	No change required.

Withyham Parish Council • Supports Policy CC8 and highlights the importance of drainage plans, coordinated flood/drainage/water management measures, and further information on avoiding sewage contamination by water utilities.	• Comments noted. These matters are relevant to the implementation of sustainable drainage and wider infrastructure planning.	No fundamental policy change required.
Isfield Parish Council • Supports Policy CC8.	• Support noted.	No change required.
Pevensey Parish Council • Objects to Policy CC8 due to concerns that Map 6 is difficult to read, with woodland, High Weald National Landscape, watercourses, boundaries and roads hard to distinguish.	• Comment noted. Mapping has been reviewed.	New map to be published.
• **Rotherfield Parish Council** Supports Policy CC8.	• Support noted.	No change required.
Laughton Parish Council • Supports Policy CC8, particularly the strict requirements for development in the Pevensey Levels hydrological catchment.	• Support noted.	No change required.
Mayfield and Five Ashes Parish Council • Welcomes the comprehensive and robust policy but suggests it should be made clear that Policy CC8 deals with surface water, while foul water	• Comment noted.	No fundamental policy change required.

drainage and sewage are addressed by Policy NE13.		
Site Promoters and Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Village Concerns • Objects to Policy CC8. Raises concern that SuDS maintenance arrangements are insufficient where responsibility passes to residents' management companies, creating unknown costs and risk of poor long-term maintenance. Requests clear responsibility for ongoing SuDS effectiveness.	Comments noted. Long-term management, maintenance and enforceability of SuDS schemes is an important issue and is addressed clearly in supporting text.	Policy wording updated.
Clarity Ecoworks • Objects to Policy CC8. Requests that runoff calculations are linked to post-construction topsoil depth, that a precautionary approach is taken in the Pevensey Catchment Area, and that household/vehicle chemical loads are remediated near tributaries and the Ramsar boundary. Raises concern that clay conditions can reduce SuDS performance and require alternative treatment methods.	• Comments noted. The policy/supporting text has been checked against technical evidence on SuDS performance, water quality treatment and the Pevensey Levels hydrological catchment.	Policy and supporting text on water quality treatment updated.
Dicker Residents Association • Supports Policy CC8 but considers stronger powers are needed over developers and water companies to enforce compliance, particularly	• Comments noted. Wider water industry and enforcement matters sit partly outside the Local Plan, but the policy can support	No fundamental policy change required.

where existing water and wastewater systems are overstretched.	appropriate drainage design and planning-stage controls.	
Grosvenor Property UK Limited • Supports Policy CC8.	• Support noted.	No change required.
The Working Group Against Over Development and CPRE Sussex • Support Policy CC8 subject to adding wording to criterion 5 requiring evidence that no harm to the conservation objectives of the Pevensey Levels SAC and Ramsar site will arise.	• Comments noted. The relationship between SuDS treatment requirements and Habitats Regulations mitigation has been reviewed.	Policy and supporting text updated.
Sussex Wildlife Trust • Supports Policy CC8, particularly criterion 3(d).	• Support noted.	No change required.
Hertfordshire Holdings • Neutral. Considers that national and LLFA guidance should not be repeated in Policies CC7 and CC8, and that shorter, simpler policies should be supported by guidance or validation checklist requirements where appropriate.	• Comments noted. The balance between policy requirements and supporting guidance has been reviewed to ensure the policy is concise, effective and justified.	Policy and supporting text updated.
Uckfield Community Technology College • Supports Policy CC8 but raises concerns about the cumulative volume of SuDS, potential pollution of the Pevensey Levels, increased water/flooding at Framfield Stream, long-term	• Comments noted. The policy and supporting text recognises long-term management, cumulative impacts, sensitive habitats and water quality considerations where relevant.	Policy and supporting text updated.

SuDS ownership and maintenance, surface water road runoff and CSO discharges, and avoiding adverse impacts on ghyll habitats, wet woodlands, ancient woodlands and other sensitive features.		
Gladman Developments Limited • Neutral. Requests that criterion 7 clarifies that detailed surface water drainage information for HRA purposes is required only where hydrology is identified as a potential impact pathway through HRA screening.	• Comment noted.	Supporting text has been updated.
Bellway Strategic, Hempstead Farm Limited, Earlswood Homes Holdings Limited, Stonebond Properties (Sevenoaks) Limited & Akehurst Homes Limited, Fernham Homes (Sussex) Limited, Obsidian Strategic Asset Management Limited and Tarn (Mornings Mill) Limited • Neutral. Joint comments submitted by DHA Planning raise concern that criterion 3(g) does not accord with Building Regulations where surface water connection to foul drainage may be permitted after sequential options have been shown to be impracticable. Also notes that criterion 5's treatment-stage approach should align with the SuDS Manual and other drainage guidance.	• Comments noted. The policy has been checked for consistency with Building Regulations, the drainage hierarchy and technical SuDS guidance.	Policy and supporting text updated.
Sussex Ornithological Society	• Support noted.	No change required.

• Supports Policy CC8 and fully endorses paragraph 5.114 as essential to maintaining protection of the Pevensey Levels.		

Local Residents	WDC Response	Changes made to policy/chapter
<u>Local Residents</u> **Support: 18 general supportive comments; 9 supportive comments with further issues raised.** • Support for mandating SuDS and ensuring drainage plans do not increase flood risk. • Requests stronger enforcement, clearer implementation standards and long-term SuDS maintenance/management provisions. • Support for prioritising natural SuDS, rainwater harvesting, bioswales, rain gardens, biodiversity benefits and early integration into site design. • Concern that porous surfaces may be ineffective during heavy rainfall and that developers should be responsible for damage caused by inadequate drainage. • Requests a precautionary approach to the Pevensey Levels catchment, mandatory construction management plans, stronger wording than "consider/where possible", and consideration of upstream/downstream impacts.	• Comments noted. The policy will continue to require sustainable drainage and ensure that drainage strategies manage surface water, flood risk, water quality and long-term maintenance. Several matters raised relate to wider water company obligations and infrastructure regulation, but the Local Plan can clarify policy expectations, strengthen supporting text and ensure development proposals address site-specific and catchment-level drainage constraints.	Policy and supporting text on water quality treatment updated.

Neutral: 6 comments. • Calls for stronger drainage policy in Horam, Hailsham, Pevensey Levels and Eastern Westham. • Concern that SuDS can be overly engineered and should positively contribute to the external environment. • Requests clearer accountability on flooding, sewage backing-up, drainage ditches and independent assessment before new development drains into ditches. • Suggests excess soil from landscaped developments should be treated as construction waste where it disrupts riparian flows. **Object: 43 comments.** • Concern Policy CC8 does not go far enough to protect the Pevensey Levels, particularly where clay limits infiltration and SuDS performance. • Requests no surface water connectivity where links to combined sewers are uncertain, and phasing out combined sewers by 2040. • Concerns about SuDS not working effectively in Wealden, existing network capacity, sewage discharges, Southern Water performance and the need for adequate funding. • Requests stronger requirements to minimise hard surfacing, incorporate blue-green infrastructure/attenuation ponds, consider		

contaminated runoff, and address local examples such as Peelings Lane and Rosemead, Horam. • Repeats concerns about residents' management companies taking on SuDS maintenance costs without secure long-term responsibility.		

Policy CC9: Coastal Change Management Area

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 60	Support: 30	Neutral: 1	Object: 29

Policy CC9: Coastal Change Management Area		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Environment Agency • Supports policy as it is required by the National Planning Policy Framework. • Notes the Council used the latest evidence (updated coastal erosion risk mapping and information on the emerging Pevensey to Eastbourne (Pev-Eb) arrangements) to define where long-term coastal change must be considered in planning.	Welcome the support. Agreed that the evidence base and policy should continue to be under review as the Pev-Eb project progresses. This has now been completed and a Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as part of the Wealden Local	The policy has been removed from the Wealden Local Plan and a CCMA Background Paper will be published alongside the Regulation 19 Version of the Wealden Local Plan.

• It is important that the CCMA is clearly framed as a planning policy tool, and not as an indication of changes to existing investment, operational decisions, or long-term management intentions for coastal defences. • Highlights the Pev-Eb project is still evolving, so the Council should keep the evidence base and policy under review as the project progresses.	Plan and has been emoved from the Regulation 19 Version.	
Marine Management Organisation • Wealden sits within the jurisdiction of the South Marine Plan area not the South-East Marine Plan. • Access policies could fit within the Coastal Change Management section of your consultation, while Water quality policies are relevant to your Water Quality and Treatment section under Policy CC8. In policy CC9 you discuss the Beachy Head MCZ, for this, the MPA (1-4) policies may be useful to review.	• Correction noted. A Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as part of the Wealden Local Plan and has been removed from the Regulation 19 Version.	The policy has been removed from the Wealden Local Plan and a CCMA Background Paper will be published alongside the Regulation 19 Version of the Wealden Local Plan.
Network Rail • Proposals within this area as part of the draft Policy should not impact or undermine the railway.	• Comment noted. The policy has been removed from the Wealden Local Plan and a CCMA Background Paper will be published alongside the Regulation 19 Version of the Wealden Local Plan.	No further action required.

Neighbouring/Other Local Authorities	WDC Response	Changes made to policy/chapter
East Sussex County Council • Policy CC9 is supported, particularly criterion 5, as it will help safeguard and enhance the King Charles III England Coast Path and public shoreline access. • The LLFA has an interest in coastal management because tidal influence affects the effectiveness of drainage in urban areas. • Any future coastal realignment at Pevensey Bay may have significant implications for water level and surface water management in Eastbourne, Willingdon, Polegate, Hailsham and West Bexhill.	• Welcome the support. • The coastal change management evidence base has now been completed and a Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as part of the Wealden Local Plan and has been removed from the Regulation 19 Version.	The policy has been removed from the Wealden Local Plan and a CCMA Background Paper will be published alongside the Regulation 19 Version of the Wealden Local Plan.
Eastbourne Borough Council • Policy CC9 and the identification of a Coastal Change Management Area are broadly supported, including the requirement for a proportionate Coastal Change Vulnerability Assessment. • The identification of the Pevensey Bay coastline as an area vulnerable to coastal change is considered appropriate, although it differs from the emerging Eastbourne Local Plan approach due to the distinct character of the coastline and uncertainty over future defence funding.	• Comments noted. • The coastal change management evidence base has now been completed and a Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as part of the Wealden Local Plan and has been removed from the Regulation 19 Version.	The policy has been removed from the Wealden Local Plan and a CCMA Background Paper will be published alongside the Regulation 19 Version of the Wealden Local Plan.

• The Pevensey Bay coastline should continue to be defended to reduce flood risk to northern Eastbourne, and Policy CC9 should make clear that development must not prejudice future coastal defence infrastructure or coastal access.		
Rother District Council • Rother District Council has also proposed a CCMA in its Draft Local Plan (2024) at Fairlight Cove, east of the boundary with Hastings borough. • Has not currently proposed a CCMA for the coastline from Normans Bay. • Will continue to consider CCMA designations through the plan-making process, taking account of responses to the statutory public consultation, stakeholder engagement including with the Environment Agency and the Marine Management Organisation, and continued engagement with neighbouring authorities. • Recognises the importance of a complementary and consistent approach to designating CCMAs and managing land uses across administrative boundaries where appropriate.	• Comments noted. • The coastal change management evidence base has now been completed and a Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as part of the Wealden Local Plan and has been removed from the Regulation 19 Version.	The policy has been removed from the Wealden Local Plan and a CCMA Background Paper will be published alongside the Regulation 19 Version of the Wealden Local Plan.

Hastings Borough Council • Supports the CCMA policy and the approach to residential development and environmental protection there.	• Welcome the support. • The coastal change management evidence base has now been completed and a Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as part of the Wealden Local Plan and has been removed from the Regulation 19 Version.	The policy has been removed from the Wealden Local Plan and a CCMA Background Paper will be published alongside the Regulation 19 Version of the Wealden Local Plan.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Community Project Ltd • The co-housing scheme does not have permitted development rights, so even very small spatial changes require full planning permission. • The planning process has been difficult and expensive for residents. The respondent believes this is unfair. • They consider the benefits of retaining permitted development rights in this area to outweigh the risks.	• The coastal change management evidence base has now been completed and a Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as part of the Wealden Local Plan and has been removed from the Regulation 19 Version.	The policy has been removed from the Wealden Local Plan and a CCMA Background Paper will be published alongside the Regulation 19 Version of the Wealden Local Plan.

Sussex Wildlife Trust • Support of this draft policy, particularly criterion 7.	• Welcome the support. • The coastal change management evidence base has now been completed and a Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as part of the Wealden Local Plan and has been removed from the Regulation 19 Version.	No further action required.
Dicker Residents Association • Supports the policy • Removal of development boundary for vulnerable sites outside Pevensey Bay.	• Welcome the support. • The coastal change management evidence base has now been completed and a Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as part of the Wealden Local Plan and has been removed from the Regulation 19 Version.	No further action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Heathfield & Waldron Parish Council • It supports the designation in principle, despite no direct coastal protection interaction within the Parish.	• Welcome the support. • The CCMA policy is not being progressed as justified above.	No further action required.

Uckfield Town Council • Would support all policies to protect the coastline but also recognises that it's very difficult to beat nature. Arun District Council for example has invested a lot at Pagham Harbour, but met challenges, and the same is being experienced at Seaford.	• Welcome the support. • The CCMA policy is not being progressed as justified above.	No further action required.
Rotherfield Parish Council • Supports the policy.	• Welcome the support. • The CCMA policy is not being progressed as justified above.	No further action required.
Pevensey Parish Council (PPC) • Objects to the designation of a CCMA at Pevensey Bay and strongly urges deletion of the policy. • If the policy and area are retained, the whole area shown on their coloured plan should be included. • The draft policy inappropriate, misconceived, contrary to national policy, and unlawful, and says it should be deleted along with the related section. • Wealden should not include this policy now, or in a future Local Plan review, unless national 'hold the line' policy changes, the Environment Agency stops maintaining and funding coastal	• WDC welcome the response and PPC's detailed comments and contribution to the evidence based for the proposed CCMA. The evidence base and policy development is continually under review as the Pev-Eb project progresses, but it was important to have a formal policy position for the Local Plan. This has now been completed and a Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as	The policy has been removed from the Wealden Local Plan and a CCMA Background Paper will be published alongside the Regulation 19 Version of the Wealden Local Plan.

defences, and central government funding intentions for Pevensey Bay change. • Does not support an Article 4 Direction and says no such policy should be included in the plan. • Does not support removing the Pevensey Bay development boundary, arguing this is inconsistent with the approach taken to Polegate and Hailsham, which are also at risk if coastal defences fail. • The approach should be consistent across Hailsham, Polegate, and Pevensey Bay: either all are protected through maintaining coastal defences, or none are.	part of the Wealden Local Plan and has been removed from the Regulation 19 Version.	
Local Residents	**WDC Response**	**Changes made to policy/chapter**
• General balance on support of the policy: Support - 18, Object - 26 • Supporters see Policy CC9 as a way to help secure long-term flood-defence funding and protect homes, jobs, and infrastructure. • Several responses argue the proposed Pevensey Bay CCMA boundary is too limited and should be widened, including to reflect the 2125 flood cell and possibly offshore development. • Some respondents support removing development boundaries and permitted development rights, while others argue any	• Comments noted. • The coastal change management evidence base has now been completed and a Background Paper has been finalised, which has justified that a CCMA is on balance not necessary to be progressed as part of the Wealden Local Plan and has been removed from the Regulation 19 Version.	The policy has been removed from the Wealden Local Plan and a CCMA Background Paper will be published alongside the Regulation 19 Version of the Wealden Local Plan.

Article 4 Direction should be carefully targeted and proportionate. • Other points raised include allowing suitable development where appropriate, accepting coastal change as inevitable, and encouraging a joined-up policy approach across neighbouring authorities. • The text refers to Figure 13 - I think it should be Figure 14, since that shows the proposed CCMA.		

Natural Environment

Policy NE1: Biodiversity, Geodiversity & Nature Recovery

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 372	**Support:** 178	**Neutral:** 125	**Object:** 69

Policy NE1: Biodiversity, Geodiversity and Nature Recovery		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Supports policy but recommends clarity on how 'giving appropriate weight to the statutory processes and special qualities' will be interpreted. Should reflect para 181 and 185 of the NPPF through adding minimise, avoid or fully mitigate any indirect effects to part 5(f) of the policy • Supports inclusion of protected species within the features to which the policy NE1(a) applies • Supports reference to both protected and priority species in part 5(A) of the Policy.	• Policy amended to mitigation hierarchy and reconsidered against para 181 and 185 of the NPPF. • Interpretation of the policy will be in line with the NPPF and relevant legislation. No need to repeat this in the policy wording.	Policy and supporting text updated.

Environment Agency • Supports reference made to the role that Local Nature Recovery Strategies will have in directing the decisions around Biodiversity and Nature Recovery. Supportive of the policies inclusions of wording relating to blue/green infrastructure, BNG and LNRS.	• Welcome the support.	No action required
South East Water • Supportive of the policy	• Welcome the support.	No action required
RSPB • Sites with legally protected species, such as those with Schedule 1 and Schedule 5 protection under the Wildlife and Countryside Act, should be specifically listed in the Local Plan. For example, RSPB Broadwater Warren (a habitat which is now rare), which restores rare lowland heath and ancient woodland, and hosts protected species. Highlighting such sites is essential for their protection.	• These sites are covered by the Wildlife and Countryside Act 1981 and therefore don't need further policy protection. We do not need to list all of the sites individually in the Local Plan. For instance SSSIs are not mentioned as they have national policy protection and are managed by Natural England.	No action required
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
No responses to this policy.	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Developers and Land Agents **Hertfordshire Holdings**	• The policy wording is considered necessary and is supported by statutory consultees. • A separate policy and justification is provided for BNG	No action required

• Policy is unnecessarily long and much of the content would be more appropriate as guidance or supporting text • Policy NE1 does not justify why WDC needs a 20% BNG policy • Policies should address reasons for biodiversity decline and the evidence to support this. • Footnotes referencing the 2021 NPPF should be updated • Our landholding presents an opportunity to deliver multifunctional greenspace that delivers BNG and this should be allocated in the Plan.	• A background evidence sets out context and background to the policy • All NPPF references will be updated	
Nevill Estate Company and Hop Farm Real Estate Limited • Considered that it repeats national policy and legislation • It is unclear what the policy is attempting in relation to the application of the mitigation hierarchy • Reference to Local Wildlife Sites should be examined. There is no regulation or historic surveys and policy must include up to date evidence on selection criteria. • Part 4 of the policy links to other policies within the plan and the policy fails to identify these interactions. • The policy fails to explain the important interactions with the Local Nature Recovery Strategy	• The policy wording is considered necessary and is supported by statutory consultees. • The policy follows the principle of avoidance, mitigation and then compensation, to ensure that developers do not cause undue harm where it can be avoided. • Local Wildlife sites evidence base is up to date and is reviewed and assessed by the Sussex Wildlife Trust • The environmental evidence base is considered sufficient and robust of the Local Plan.	The supporting text to the policy is strengthened to show linkages to other policies in this chapter and the Local Plan. The LNRS is now adopted references are updated.

• The evidence base for the policy is lacking, and the policy should state how it expects to establish baselines for ecosystems as well as how net gains will measured and monitored.		
Terra Strategic • Unnecessary to have 2 policies for general biodiversity and then BNG, they should be considered together.	• It is considered that BNG is a specific policy requirement that requires its own policy	No action required
Property Consultants, Faulkner Farm Partnership, Sclater Estates Ltd and Forest Row Local CBS Limited • Improve NE1 by requiring sequential preference for less sensitive sites and independent assessments of alternative sites to mitigate environmental impacts.	• The policy has been streamlined.	Policy is streamlined.
Taylor Wimpey UK Ltd • Policy is convoluted, complex and contradicts other policy requirements and considerations, especially in respect of criterion 5, which is applied to "relevant development proposals". It is contrary to the NPPF (para 16 d). • NE1 5 a) creates a burden on developments which is not "Justified" and should not be an expectation/requirement of developments. • NE1 5 d) lacks definition in terms of what are "ecosystem services" and how is "geological value" defined. It requires protecting soils supporting biodiversity, but this is already	• Part 5 of the policy applies in the same way as part 2 of the Policy '*Development proposals affecting biodiversity and geodiversity*' so this has been added to the policy wording to avoid ambiguity. • This is an expectation of applicants, and is considered reasonable • The focus of this criterion is the quality of soils and resilience to climate change so that wording can stop after good quality soils.	Policy wording changes made.

mitigated by BNG and other measures. It adds unnecessary requirements, hindering development. • The NPPF (para 180 a) seeks soils to be protected and enhanced in a manor commensurate with their statutory status or identified quality in the Development Plan. The Development Plan does not identify the quality of soils, treating all soils the same and therefore burdening developments with additional requirements, which might not be possible to achieve, i.e. improving carbon storage and is therefore not in line with the NPPF (para 180 a).	• The focus of the policy in relation to soils is 'where possible' – this does not mean a mandatory requirements.	
Wates Development • NE1 (2) goes well above the requirements of the NPPF and therefore is not in accordance with it. NE1 refers to any harm, whilst NPPF 186a refers to significant harm. NE1 should reflect the higher level of harm allowed by the NPPF. • NE1 should be rewritten to reflect the higher level of protection to designated sites whilst allowing less than significant harm to other ecological resources. NE1 3 supports this approach as reference to significant is correctly applied. This should also apply to other ecological resources.	• The requirement to apply the mitigation hierarchy itself is entirely consistent with the NPPF, however it is considered that significant harm should be stated rather than harm to be consistent with the NPPF. • On wider consideration, the criteria elements of the policy will differ depending on the nature and designation of the site.	Amend part 2 of the policy to shorten it read '*Development proposals affecting biodiversity and geodiversity will be required to apply the mitigation hierarchy of avoidance, mitigation and, as a last resort, compensation*. *Development proposals that would result in **significant** harm to biodiversity or geodiversity which cannot be adequately avoided, mitigated or compensated for will not be supported*.

SE Marts Ltd • Designating the Hailsham Cattle Market relocation site as a Biodiversity Opportunity Area is inappropriate. Proper design can protect nearby ancient woodland, and development offers more BNG and biodiversity benefits. The BOA designation stifles development without wider environmental or economic benefits.	• This not a matter for the policy or the supporting text, but comments are noted	No action required.
Grosvenor Property UK Limited • Supportive of the policy approach.	Welcome the support	No action required.
<u>Organisations with Specific Interests</u> **Village Concerns** • Mitigation must be proven and funded. Often, schemes fail and are not rectified. Trees and shrubs planted for biodiversity on new estates frequently do not survive. • Guidelines should limit mitigation distance from the original development. Mandatory 5-year audits for 30 years should be funded by developers and controlled by the LPA.	• Comments noted, suitable buffers will be based on the designated site, and these are covered suitably by the policy and other policies in the Natural Environment Chapter.	No action required.
Uckfield Community Technology College • Implement 400m buffers to protect SSSI ecosystems. Local Wildlife Sites (LWS), Local Geological Sites (LGS) and Local Nature Reserves (LNR) need much larger buffers to protect their ecosystems, it is a starting point	• There is no available evidence to support implementing a 400m buffer or prescription figure for other designated sites. Suitable policy	The policy wording has been updated to reflect the adopted Local Nature Recovery Strategy

and we need much more to meet the Lawson principles • Policy needs to ensure no fragmentation of important nature recovery corridors NPPF 185. • Incorporate 'Weald to Waves' mapping and Sussex Wildlife Trust new maps into nature recovery plans. Increase and improve BOA, and connect all designated areas (AF, Pevensey, RPG, GII*, National Monuments, LNR, LWS, LGS, Water catchments, Geodiversity records, SSSI, NNR). Current maps fail to reflect our natural resources due to overdevelopment.	wording is provided within part 5c of the policy. • The policy has beenupdated to reflect the adopted Local Nature Recovery Strategy • Planning application will consider up to date mapping on designated sites, as these may be updated over time.	
The Working Group Against Over Development and CPRE Sussex • suggest NE1 1c) be reworded thus: Ensuring that the required 20% biodiversity net gain is in addition to any mitigation or compensatory measures.	• Policy NE1 does not need to repeat the BNG policy so no need to specifically mention the percentage in this policy.	No action required.
Conservators Of Ashdown Forest • Reference should be made to lowland heathland, especially Ashdown Forest, as a key landscape and biodiversity value of the district. • The statement '... even the inspiration we take from the natural environment and wildlife' inadequately describes 'cultural services,' a key category of ecosystem services. Cultural services are diverse, crucial for conservation, wellbeing, and economic development. Nature	• Ashdown Forest and Lowland heath is referenced in para 6.5 and there is a specific policy related to it at NE5, demonstrating its significance. • Comments noted, references to appropriate development are considered and stated elsewhere in the Local Plan. • The policy does consider all forms of designated sites as well as opportunity to create green/wildlife	Proposed rewording of Part 6 of the policy: *"The loss, deterioration or fragmentation of existing wildlife-rich corridors and stepping stones will be resisted. Development proposals must maintain and, where possible, enhance ecological connectivity and the integrity of the wider nature recovery network."*

tourism, often misclassified, clearly links nature and tourism • appropriate development can take place in the countryside.' This needs a caveat: small housing developments are problematic due to landscape impact and lack of sustainability, especially regarding the 20-minute community concept. This should be a special consideration within HWNL Zones of Influence. • This is the only mention of SSSIs in the document. While noting indirect impacts on designated sites and habitats is helpful, including impacts on connectivity and corridors would strengthen the section, as these are crucial for biodiversity, geodiversity, and nature recovery • "The loss of existing wildlife rich corridors and stepping stones should be avoided." This is not strong enough. There should be a presumption in the Plan and mechanisms to deliver it that loss of such assets will be prevented.	corridors along with linkages to the Local nature Recovery Strategy. • Rewording of part 6 of the policy to strengthen wildlife corridors is proposed.	
JG Theatre Club • The district's natural environment, including 61% Ancient Woodlands, Ashdown Forest, and Pevensey Levels, is of national and international significance.	• The comment is noted and is reflected within the wider preamble and supporting text.	No action required
Sussex Wildlife Trust • Strongly supports NE1. We particularly support the requirement to apply the mitigation hierarchy, the requirement for up to date	• Welcome the support. Small changes are being proposed to the policy to ensure consistency with the NPPF.	No action required

ecological evidence and the reference to Local Wildlife Sites. We would like all elements of the policy to be continued into the next version of the plan.		
Transport Future East Sussex • Developer proposals reflecting car culture should be challenged, exploring active travel and public transport options to meet NE1/NE2 objectives. Major road projects should not dictate development, as they lead to inefficient land use and habitat damage.	• This comment does not directly relate to this policy or the supporting text.	No action required
Church of England • Neutral in their response.	• No action required.	No action required.
Friends of the South Downs • Suggest adding a reference to the South Downs due to nearby development.	• Reference to relationships with South Downs National Park is provided elsewhere in the Plan and is not relevant to this policy which just relates to the areas of planning control within Wealden District	No action required.
Rotherfield Protection Group • Policy includes no reference to Biodiversity Opportunity Areas despite such areas being shown on the policies map including Policies Map 51 & 52 for Rotherfield. • Paragraph 6.43 briefly mentions Biodiversity Opportunity Areas without explaining their purpose or the implications for development	• Biodiversity Opportunity Areas are referenced in the Local Nature Recovery Strategy and reference to that strategy in the policy and supporting text ensures consideration of the BOAs in planning decisions.	No action required.

proposals. More clarity is needed on the policy designation and its effects on these areas.	• It is not considered that any further level of detail is required within the policy or supporting text.	
High Weald Swifts • Policy NE 1 should include a requirement that all new developments (save those less than 4m in height) should include accommodation for swifts by way of swift bricks or soffit boxes or in some other appropriate manner.	• The Planning Practice Guidance specifically states that planning authorities should consider opportunities for developments to conserve and enhance biodiversity, including for priority and declining species. However, we do not consider that it is appropriate for additional policy wording on this matter to strengthen the policy.	No action required
Hedgehogs4hailsham • Para 6.18 should clearly state that ecological corridors will extend into housing developments. Simple corridors like hedgehog highways in fences are crucial for supporting wildlife. • Para 6.31 should include hedgehogs as protected species. The Mammals Protection Act 1996 makes it illegal to treat hedgehogs cruelly. Hedgehogs are also listed as priority species in the NERC Act and the Biodiversity Action Plan. They are indicators of overall wildlife health, and their decline signals broader biodiversity issues.	• Comment noted.	No action required.
The Woodland Trust, and Swifts & Planning Group	• Comments noted	Proposed new Part 5i to the Policy which reads as:

• Policy could be strengthened with explicit reference to supporting natural regeneration and procurement of native species from local / UK-sourced stock, to support biodiversity, biosecurity and resilience. • NE1 5 g) should be amended to read "Maximise opportunities to deliver additional ecological and biodiversity features and support biodiversity enhancement through scheme design and species selection • Add new NE1 5 i) to read "Maximise the contribution to biosecurity and resilience by prioritising natural regeneration and specifying native species from local or UK sourced & grown stock for planting schemes" • Swift bricks, bat boxes, and hedgehog highways are highlighted as valuable in national planning guidance. Swift bricks are more beneficial than external bird boxes as they are permanent, maintenance-free, aesthetically integrated, and offer better thermal regulation. Swift bricks should be included in all developments per BS 42021:2022 guidelines.		*Contribute to ecological resilience and biosecurity by prioritising natural regeneration where appropriate and, where planting is required, using native species of appropriate provenance.*
Clarity Ecoworks • Pevensey Levels, with its Ramsar status, should have its own policy, visitor centres, a 40mph speed limit, and educational signs. This would create a Wealden Super Site at minimal cost.	• Comments noted, this is not necessary in this section of the Local Plan. Pevensey Levels is specifically mentioned in other policy areas.	No action required.

<u>Resident Associations</u> **Dicker Residents Association** • Supportive of the policy	• Welcome the support	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Rotherfield Parish Council • Supportive of the policy.	• Welcome the support	No action required.
Heathfield & Waldron Parish Council • Policy NE1 (1) focuses on defending biodiversity, but it should aim to improve it to remedy past losses, complementing NE1 5 (g). The policy should also mention special zones in the Local Plan area, like SSSIs • NE1 5 f) the wording could be improved as the intent is not clear. Perhaps use "Take all reasonable steps to minimise any indirect adverse effects on habitats and species including those caused by recreation, lighting, disturbance, water quality, pollution or invasive species" • Para 6.27 final sentence, we suggest that the Council should "protect and seek to enhance these priority habitats". • We would suggest some explanation to justify Artificial Light restrictions as part of NE1 5(f).	• Comments noted, but it considered that the policy wording is detailed enough in this regard. • Amendments to include 'take all reasonable steps to' Part 5f of the policy is supported. • Artificial light restrictions - This wording aligns with biodiversity, landscape and dark-sky objectives expected in local plan policies.	Amend Part 5f of the policy, so that it reads: *'Take all reasonable steps to minimise any indirect adverse effects…'*
Mayfield and Five Ashes Parish Council	• Part 2 of the policy is revised as identified to the right.	Amend part 2 of the policy to shorten it read '*Development proposals affecting biodiversity and geodiversity will be*

• The effectiveness NE1 2 would be comprised by sub-paragraphs (a) and (b). The only exceptions that should be allowed are those in sub-paragraphs (c) and (d). The relevant target in Chapter 14 should be improved by specifying a quantified measure of improvement.		*required to apply the mitigation hierarchy of avoidance, mitigation and, as a last resort, compensation.* *Development proposals that would result in **significant** harm to biodiversity or geodiversity which cannot be adequately avoided, mitigated or compensated for will not be supported.*
Polegate Town Council • It needs to be clear in the policy where you would not accept loss/damage. Its too vague. Where no suitable alternative is. It needs to be more specific and clearer. • Very aspirational - no indicator of how biodiversity will be replaced if there is no extra offsite land available • "Strengthen wildlife habitats" needs clearer definition, including planning conditions.	• The policy has been strengthened in relation to these comments, as a result of other representations on this policy.	No action required.
Laughton Parish Council • CC1 7 refers to appropriate and up-to-date ecological surveys. Can 'appropriate' be strengthened to ensure that surveys are not carried out in months (eg November/December/January) when ecology cannot be meaningfully assessed.	• We consider that the policy wording is strong enough with regards to your comments.	No action required.
Horam Parish Council	• Geodiversity will be defined in the glossary	No action required.

• The term Geodiversity must be defined.		
Withyham Parish Council • Planning permission should be refused where significant harm to biodiversity cannot be avoided.	• Comment noted	No action required.
Isfield Parish Council • Para 6.3 should emphasise that the extent of ancient woodland in the District is not only a local but also a national irreplaceable habitat of major significance.	• We consider that the policy wording is strong enough.	No action required.
East Hoathly with Halland Parish Council • Wealden has significant natural assets, including Ashdown Forest, Pevensey Levels, SSSIs, and Local Wildlife Sites. Policy NE1 should include a sequential preference approach, prioritizing the least sensitive sites first, and independent assessments to minimize environmental impacts.	• It is considered the policy is consistent with the requirements of the NPPF, and any impact on each environmental designated site will be considered individually.	No action required.
Westham Parish Council • Developers should preserve as much hedgerow as possible and not replace large sections with whips that take years to support wildlife**.**	• Comments noted	No action required
Uckfield Town Council • The BOA in Uckfield is incredibly important supporting international, national, county and	• We consider that the policy wording is strong enough with regards to thesecomments, further to other	Policy revised.

local designations and a rare peat fed lake and restorable heath and acid grasses in the mosaic of habitats. We do not support any change to BOAs status or boundaries. • Para 6.12 LNRS / NRN should have more weight in the plan and added to the buffers of connectivity to avoid fragmentation • Para 6.31 more protection for HPI and SPI is needed in this plan and these important habitats avoided, again NPPF para 185 applies. • Terminology should say 'will have regard' rather than should. • Many other detailed comments in relation to trees and buffer zones.	changes that have been made to add detail to specific areas of the policy.	
Wartling Parish Council • The plans refer to existing areas and the generation of buffer zones presumably between large scale developments. We need to expand this more rather than just use it as a tool to separate developments.	• We consider that the policy wording is strong enough with regards to your comments. Buffer zones are also dealt with under additional policy areas of this chapter of the Local Plan.	No action required
Berwick Parish Council • Add a buffer zone around development to reduce impact on Priority Habitat and Biodiversity Opportunity Areas.	• We consider that the policy wording is strong enough with regards to your comments. Buffer zones are also dealt with under additional policy areas of this chapter of the Local Plan.	No action required
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Additional comments to the above already considered raised by local residents include:	• All of these comments have been considered and noted. Where the policy wording could be	See amended policy and supporting text.

Planning Application Related Comments: • Applicants should be "required", not "encouraged" to consult the Sussex Biodiversity Record Centre for protected species information. • Conduct surveys before habitat destruction. Use the site's prior condition as the baseline. • Do not allow exceptions - always prioritise nature and biodiversity over and above development. • Mitigation must be proven and funded. Often, schemes fail and are not rectified. Trees and shrubs planted for biodiversity on new estates frequently do not survive. • Retain mature hedgerows and trees; cut and lay or stake and bind hedgerows to strengthen them and support rural skills. Protect species, don't relocate them. Require 6-month ecological reports for major developments • Developers often remove topsoil, which contains much of the biodiversity. **Improving Policy wording:** • Improve NE1 by requiring sequential preference for less sensitive sites and independent assessments of alternative sites to mitigate environmental impacts. • 61% of the district's woodlands are nationally significant Ancient Woodlands. The District	strengthened this has been achieved by proposed amendments above by other consultees. In other areas we consider the policy is strong enough in its wording to respond to the issues that have been highlighted in the responses. • The mitigation hierarchy proposed within the policy and reference to consideration of impacts on environmentally designated sites, is consistent with the NPPF requirements. • The words 'consider' and 'where possible' are consistent with NPPF requirements, where it is feasible to do so. • Climate change adaptation is referenced specifically in part 5d of the policy. • The policy does link to tother policies in the natural environment chapter of the Local Plan, most specifically the BNG policy which provides detail on requirements and implementation. • The policy does not aim to merely repeat national policy in the NPPF, but to reference it and be clearly consistent with it. • Updated reference to the adopted Local Nature Recovery Strategy will	

Local Plan should highlight this, similar to the High Weald National Landscape. • Link biodiversity, geodiversity, and nature recovery with climate change adaptation. Protecting habitats supports biodiversity and provides ecosystem services like flood mitigation, carbon sequestration, and temperature regulation. These recommendations strengthen Policy NE1, ensuring it protects and enhances Wealden's natural heritage. A holistic, detailed, and community-inclusive approach sets a strong foundation for sustainable environmental stewardship. • Weak wording like 'consider' and 'where possible' lets developers avoid policy aims. Environmental policies should be mandatory with high standards. • The plan is aspirational but lacks details on replacing biodiversity on developed land. With no extra land available, many species needing specific areas, and no recourse if biodiversity plans fail, there's no policy to ensure gains last 5-10 years. • policy repeats considerations already covered by legislation and national policy, including the Environment Act, Biodiversity Net Gain Statutory Instruments, and the NPPF. • The policy should clarify that LNRS will replace BOAs, apply the mitigation hierarchy appropriately, avoid repeating laws, and address ecosystem services stacking. The	be provided. The LNRS takes account of BOAs and their importance to help guide planning decisions. • Local Wildlife Site data and sites are regularly assessed through a rolling programme. The Sussex Wildlife Trust provide the Council with up to date data in this regard.	

Council must explain how it will measure and monitor "net gains" for carbon, biodiversity, green infrastructure, and woodland, given the lack of metrics. • NE1,4 states that "…. the remaining area of the site will be protected by a planning condition or obligation". CC1 or supporting text fails to set out how such areas will interact with the requirements of NE2 (and statutory BNG), CC4, SS10, NE4 or NE5. • The language in NE1 is open to interpretation and policy abuse. For example, 2b states "the adverse effects are unavoidable," which developers can easily exploit. • Identify drivers to prioritize avoidance over mitigation and compensation. Biodiversity must become a priority. **Designated Sites and Other Strategies** • Local nature reserves e.g West Park should be protected from any future development e.g proposed dual carriageway for Uckfield bypass. • The National Recovery Strategy should address biodiversity loss, climate change, and public health, but exclude sensitive wildlife-rich corridors and habitats. • Bewl Water is crucial for roosting winter gulls and meets RAMSAR criteria. It's being assessed for SSSI status and must be protected from tourist development. The 2023		

Bewl Water Gull Report highlights the impacts of human disturbance on gull roosts. • Examine references to Local Wildlife Sites in the evidence base. This data isn't publicly available in East Sussex, and landowners may be unaware of their designation. These sites lack regulation and are often based on outdated surveys. Their condition is unclear. Policies must include current condition data and selection criteria.		

Policy NE2: Biodiversity Net Gain

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 164	**Support:** 96	**Neutral:** 4	**Object:** 64

Policy NE2 – Biodiversity Net Gain		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • We welcome the Council's commitment within Policy NE2 to maximise the delivery of net gain, requiring developments to deliver a minimum of	• Comments noted. The Council has prepared additional evidence base on BNG viability to support the policy. This demonstrates that around 15% BNG is	The revised evidence base supports delivering a minimum of 15% BNG and as such Policy NE2 has been amended.

20% above the biodiversity baseline, following the application of the mitigation hierarchy. • It was considered that where delivery above the minimum 10% BNG is suggested, the Council should support the Policy with a robust evidence base.	achievable across all sites, with some being able to achieve higher.	
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tunbridge Wells Borough Council • We are supportive of draft Policy NE2 Biodiversity Net Gain. • It was suggested that some clarity might help with criterion 3 – to require on-site wherever possible.	• Comment support noted.	Amended policy tro refer on-site delivery wherever possible.
Sevenoaks District Council • We note that the Council is exploring a greater than 10% increase in biodiversity net gain and we are supportive of this approach. • To date we have also been exploring a higher figure of 20% and are keeping this under review, particularly in light of the Government's latest advice in the PPG.	• Comment support noted.	No action required.
Other Consultees/Consultation Bodies	**WDC Response**	**Changes made to policy/chapter**
Clarity Ecoworks • We disagree with draft Policy NE2 Biodiversity Net Gain.	• Comment noted. The evidence base supports setting higher BNG percentages for developments.	No action required.

• It was suggested that the BNG requirement should be higher to allow for human error of habitat judgement in the field. • It was also suggested that the BNG target should be raised to 50%.		
Transport Futures South East • We agree with the principles set out in draft Policy NE2 Biodiversity Net Gain. • It was suggested that where the abiding culture of the car is reflected in developer proposals, it should be challenged and active travel/public transport options explored to better deliver objectives of draft Policies NE1 and NE2. • It was also suggested that major road projects should not determine the characteristics and form of development where this leads to inefficient land use and fragmentation, damage and destruction of habitats.	• Comment noted.	No action required.
The Working Group Against Over Development and CPRE Sussex • We are supportive of draft Policy NE2 Biodiversity Net Gain. • Two major concerns were raised: the statutory biodiversity metric may fail to fairly assess undeveloped sites and development impacts; and any increase above the statutory 10% must be fully justified. • It was suggested that the metric does not consider soil biodiversity or cat predation	• Comment noted.	The revised evidence base supports delivering a minimum of 15% BNG in line with the amendments made above.

impacts and therefore underestimates development impacts on biodiversity. • It was suggested that the proposed 20% net gain is insufficient to prevent overall biodiversity loss because of these metric limitations. • It was suggested that the Council should provide sufficient justification in the Regulation 19 Plan for a 20% BNG requirement. • It was noted that BOAs should not be developed unless an equally suitable nearby replacement BOA is identified.		
Village Concerns • We are supportive of draft Policy NE2 Biodiversity Net Gain as written. • Guidelines should limit how far off-site BNG can be from the original development, suggested as no more than 1km. • Concerns were raised that on-site BNG may impose maintenance burdens on resident management companies and residents through service charges. • Maintenance cost estimates should form part of planning applications. • Concerns were raised about inspection and ongoing maintenance of BNG schemes. • It was recommended that the policy includes measures to ensure responsibility for the ongoing effectiveness of BNG schemes.	• Comment of support noted. Supporting text will be revised and new text added in line with what is presented to the right.	Supporting text has been amended to respond to a number of the points raised

Dicker Residents' Association • We are supportive of draft Policy NE2 Biodiversity Net Gain. • It was suggested that enforcement must be clearly shown and implemented.	• Comment of support noted.	Strengthened supporting text on enforcement has been provided in the Regulation 19 Plan.
Grosvenor Property UK Limited • We disagree with draft Policy NE2 Biodiversity Net Gain. • The Council's approach to seeking higher BNG than the mandatory 10% is considered unjustified and unsound. • Objection was raised to the 20% BNG requirement, whether applied to all sites or to those within/adjacent to BOAs. • It was suggested that a more ambitious BNG level than 10% could create viability issues, delay housing delivery, reduce affordable housing and affect net zero carbon delivery. • If 20% BNG is retained, viability evidence should demonstrate sufficient land availability, previous delivery of 20% gains, no undermining of site viability and further environmental protection. • Part 3 of the policy was welcomed for allowing flexibility and off-site BNG where on-site delivery cannot be meaningfully achieved. • The respondent is committed to achieving 10% BNG at Northwest Hailsham and seeking to exceed this where possible.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved. Strengthened supporting text will be provided on enforcement	The revised evidence base supports delivering a minimum of 15% BNG. Strengthened supporting text on enforcement has been provided in the Regulation 19 Plan.

• Consideration should be given to how the policy will be implemented.		
Hertfordshire Holdings Tor & Co • The draft policy is considered unnecessarily long and detailed, with much content better placed in guidance or supporting text. • The policy and supporting text do not explain why 20% BNG is specifically required in Wealden rather than the statutory 10%. • There is no explanation of the specific biodiversity and nature recovery challenges facing Wealden to justify a higher BNG target. • Footnote references to the 2021 version of the NPPF should be updated.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.s.	The revised evidence base supports delivering a minimum of 15% BNG.
Sussex Wildlife Trust • Supports the blanket minimum 20% BNG requirement across the district. • Suggests clear guidance is needed on the role of SANGs in contributing to BNG. • Suggests the policy should prevent intense recreational use of SANGs that negatively affects habitat condition.	• Comment of support noted.	Supporting text to be amended setting out the relationship between BNG and SANGs.
Savills • We disagree with draft Policy NE2 Biodiversity Net Gain. • Strong objection was raised to the unevidenced need to seek more than the mandated 10% through a blanket approach.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved. • The policy does not need to prescriptively stated where BNG should apply, BOAs will be the focus, which is supported by	The revised evidence base supports delivering a minimum of 15% BNG.

• A minimum 20% BNG requirement is considered inappropriate across the district because delivery varies site by site. • The Council is said not to have supplied evidence to support the need for increased biodiversity despite describing Wealden as biodiversity rich. • The supporting text suggests 20% may apply within or adjacent to BOAs, but this is not reflected in the policy. • The policy is considered unjustified, not positively prepared and should be amended. • Any BNG policy should require the government-mandated 10%.	evidence in the East Sussex Local Nature Recovery Strategy and identified Network.	
Trafalgar Group Limited • Objects to the draft policy in principle due to inconsistency with national policy and guidance. • To make the policy sound, the BNG requirement should be set at a minimum of 10%. • A requirement above the 10% minimum is considered unjustified, inconsistent with national policy and not required to make development acceptable. • The financial viability of 20% BNG has not been demonstrated.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved. •	The revised evidence base supports delivering a minimum of 15% BNG.
Conservators of Ashdown Forest • Reference should be made to identifying off-site BNG locations in relation to connectivity for	• Comment noted. Additional text proposed to the policy.	Restructured policy will set out how approach to off-site BNG.

existing conservation areas and support for Nature Recovery landscapes.		
Taylor Wimpey UK Ltd • We disagree with draft Policy NE2 Biodiversity Net Gain. • The increased 20% BNG requirement is not justified, not consistent with national policy and not supported by the Council's evidence base. • The evidence base does not account for additional space requirements to achieve 20% BNG, which vary significantly by site. • No evidence has been provided to justify a higher local percentage or demonstrate support from viability evidence. • The policy is considered not justified and would undermine the spatial strategy, failing to be effective. • The policy should be removed or amended to refer to 10% BNG. • BNG should be at 10% in line with statutory requirements.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved. •	The revised evidence base supports delivering a minimum of 15% BNG.
Wealden Food Partnership • Agrees that 20% biodiversity net gain should apply across the board. • Raises concern that biodiversity net gain may not be delivered within the district. • Suggests the policy could require a percentage of BNG to be delivered within Wealden and preferably on the land being developed.	• Comments noted.	No actions required.

• Notes that farmers want BNG benefits to support land in the district rather than elsewhere in the UK.		
Nevill Estate Company, The Marquess of Christopher Abergavenny and Hop Farm Real Estate Limited • Objects to Policy NE2 and the proposed 20% BNG requirement. • Considers the policy unsound due to lack of justification, viability assessment and implementation detail. • Objects to paragraph 6.53 as excessive and unjustified. • Objects to requiring BNG through developments with limited or no biodiversity impact. • Objects to paragraphs 6.63 to 6.73 for conflating statutory requirements and local policy. • Notes that the interaction between the LNRS and BOA approaches is unclear.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved. • Additional supporting text will be considered to explain the relationship between the LNRS, BOAs and BNG • The supporting text to the policy will be reviewed and streamlined, but it is necessary to add detail to assist applicants.	The revised evidence base supports delivering a minimum of 15% BNG. Supporting text describes the relationship in delivering the objectives of the LNRS.
Home Builders Federation • Disagrees with draft Policy NE2. • Considers the 20% net gain requirement unjustified. • Considers robust evidence and detailed viability evidence are needed to justify 20%.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.

• Suggests the Council must show why 20% is required in Wealden and why biodiversity is more under threat than elsewhere. • Raises concerns about delivery, site capacity, off-site credits, developable area and viability. • Suggests a more detailed assessment is needed on allocated sites. • Suggests more local typology evidence is required. • Suggests the Council should reduce the requirement to the statutory minimum if evidence is not available.		
Terra Strategic • Objects to the proposed 20% BNG requirement. • Considers that any requirement above the statutory 10% must be justified by robust evidence. • Suggests that the requirement may affect viability and delivery.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
Grassroots Planning • Objects to the proposed 20% BNG requirement. • Raises concerns that the policy is not justified by sufficient evidence. • Suggests that the policy should align with the statutory minimum 10% requirement unless robust evidence demonstrates otherwise.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	• The revised evidence base supports delivering a minimum of 15% BNG.

Persimmon Homes South East • Objects to the proposed 20% BNG requirement. • Considers the requirement is not supported by sufficient evidence and could affect housing delivery and viability. • Suggests that the policy should be amended to reflect the statutory minimum 10% BNG requirement.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
Gladman Developments Limited • Objects to the proposed 20% BNG requirement. • Considers that the policy lacks sufficient justification and evidence. • Raises concerns about impacts on development viability and delivery.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
Esquire Developments and TWRFC • Objects to the proposed 20% BNG requirement. • Considers that the requirement should be reduced to the statutory minimum unless justified by robust local evidence. • Raises concerns about site-specific viability and land take.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
Wates Development • Objects to the proposed 20% BNG requirement. • Considers the requirement is not justified by the evidence base and may affect delivery of development.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.

• Suggests the policy should be amended to align with the statutory 10% requirement.		
DHA Planning Limited • Raises concerns about the justification for the proposed 20% BNG requirement. • Suggests that any requirement above 10% should be supported by robust local evidence and viability assessment.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
DMH Stallard • Objects to the proposed 20% BNG requirement. • Considers the approach is not sufficiently justified and could affect the viability and delivery of development. • Suggests that the policy should reflect statutory BNG requirements unless additional evidence supports a higher local requirement.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
Real Select Limited • Raises concerns about the proposed 20% BNG requirement. • Considers that the policy should be justified by robust evidence and assessed against viability and deliverability.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
Rookwood Trinity Limited • Objects to the proposed 20% BNG requirement.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.

• Considers the requirement is not justified and may affect development viability and site capacity.		
Batcheller Monkhouse • Raises concerns about the proposed 20% BNG requirement. • Suggests that the policy should be supported by robust evidence and should not undermine viability or delivery.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
Naked Vine Limited • Raises concerns about the proposed BNG requirement. • Considers that policy requirements should be clearly evidenced and deliverable.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG .
Genesis Town Planning • Objects to the proposed 20% BNG requirement. • Considers that the policy should be justified by robust evidence and assessed for viability and deliverability.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
Statkraft UK Ltd • Raises comments on the application of BNG requirements to development proposals. • Suggests that policy requirements should be clear, proportionate and capable of implementation.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.

Avison Young • Raises concerns about the justification and implementation of the proposed BNG requirement. • Suggests that any requirement above the statutory minimum should be supported by robust evidence.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
DLBP Limited • Objects to the proposed 20% BNG requirement. • Considers that the policy lacks sufficient evidence and should align with statutory requirements unless further justification is provided.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG.
ASP • Raises concerns about the proposed BNG requirement. • Suggests that the policy should be supported by clear evidence and proportionate implementation arrangements.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved.	The revised evidence base supports delivering a minimum of 15% BNG .
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Laughton Parish Council • Raises concerns about whether the proposed BNG requirement will be deliverable and enforceable in practice. • Suggests that monitoring and maintenance arrangements should be clear and robust.	• Comments noted. The evidence base sets out that higher levels of BNG can be achieved. • Additional supporting text has been provided on implementation and monitoring	The revised evidence base supports delivering a minimum of 15% BNG

Rotherfield Parish Council • Supports the principle of biodiversity net gain and seeks clarity on how BNG will be secured locally. • Raises concern that off-site BNG should be delivered close to the development site where possible.	• Policy has been refined to give further clarity on this point.	The Plan includes revised policy wording.
Polegate Town Council • Raises concerns about how biodiversity net gain will be achieved if there is limited land available on-site or nearby. • Seeks clearer explanation of how replacement biodiversity will be delivered and secured.	• Policy has been refined to give further clarity on this point.	The Plan includes revised policy wording.
Uckfield Town Council • Supports stronger protection and enhancement of biodiversity, particularly in relation to BOAs, habitat connectivity and the LNRS. • Raises concerns about ensuring that BNG contributes to meaningful local nature recovery.	• Policy has been refined to give further clarity on this point.	The Plan includes revised policy wording.
Mayfield and Five Ashes Parish Council • Raises concerns about the effectiveness of biodiversity net gain and whether targets should be supported by measurable outcomes. • Suggests that the policy should provide clarity on how improvements will be secured and monitored.	• The Plan includes revised policy wording. • Additional supporting text has been provided on implementation and monitoring	The Plan includes revised policy wording and to the supporting text.

Heathfield and Waldron Parish Council • Supports stronger biodiversity protection and enhancement. • Raises concerns about the need for clear implementation, monitoring and enforcement arrangements for BNG.	• Additional supporting text has been provided on implementation and monitoring	The Plan includes revised wording in supporting text.
Horam Parish Council • Raises comments on the need for clear policy wording and definitions to support implementation. • Seeks clarity on how BNG requirements will be applied in practice.	• The Plan includes revised policy wording. • Additional supporting text has been provided on implementation and monitoring	The Plan includes revised policy wording and to the supporting text.
Withyham Parish Council • Supports strong protection for biodiversity and the principle that significant harm should be avoided. • Raises concerns about ensuring that BNG does not weaken the need to avoid harm in the first instance.	• The Plan includes revised policy wording.	The Plan includes revised policy wording and to the supporting text.
Isfield Parish Council • Raises concerns about protecting existing habitats and ensuring biodiversity net gain does not justify avoidable habitat loss. • Seeks clear recognition of the importance of irreplaceable and valued habitats.	• The Plan includes revised policy wording.	The Plan includes revised policy wording and to the supporting text.

East Hoathly with Halland Parish Council • Raises concerns about impacts on important natural assets, including sensitive habitats and designated sites. • Suggests that biodiversity net gain should support a sequential approach that prioritises less sensitive sites.	• Comment noted. • The policy sets out the hierarchy for achieving BNG.	The Plan includes revised policy wording and to the supporting text.
Hailsham Town Council • Raises comments on ensuring that BNG is deliverable, locally relevant and capable of being monitored. • Seeks clarity on how BNG will be secured through development proposals.	• Comment noted. • Additional supporting text has been provided on implementation and monitoring	The Plan includes revised policy wording and to the supporting text.
Westham Parish Council • Raises concerns about retaining existing vegetation and ensuring replacement planting provides meaningful biodiversity value. • Suggests that BNG should avoid reliance on poor-quality or delayed replacement habitats.	• Comment noted.	The Plan includes revised policy wording and to the supporting text.
Arlington Parish Council • Raises comments on ensuring biodiversity net gain is meaningful, enforceable and delivered in locations that benefit the local environment. • Seeks clarity on long-term management and monitoring responsibilities.	• Additional supporting text has been provided on implementation and monitoring	The Plan includes revised policy wording and to the supporting text.

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents Additional comments raised by local residents include: • Support for the proposed 20% BNG requirement, with some residents suggesting higher targets should apply in BOAs, designated sites or sensitive locations. • Concerns that the proposed 20% BNG requirement may not be sufficiently justified by evidence or may affect viability, small sites and housing delivery. • Concerns about how BNG will be implemented, monitored and enforced over the long term. • Concerns that off-site BNG could allow the loss of valued green space or habitats without delivering meaningful local benefits. • Suggestions that BNG should be delivered on-site or as close as possible to the development site, preferably within the same settlement or parish. • Requests for stronger links between BNG, BOAs, the LNRS, green infrastructure, climate adaptation, ecosystem services and wider nature recovery priorities. • Concerns that existing habitats, established woodland, greenfield land and sensitive ecological areas should be protected rather than relying on offsetting or compensation.	• Comments noted. • The Council recognises support for the principle of biodiversity net gain and the proposed elevated requirement, alongside concerns about evidence, viability, implementation and long-term effectiveness. • The Council has reviewed the evidence and justification for the proposed BNG requirement, including viability and delivery implications, as part of the Regulation 19 Plan. • The Council acknowledges the importance of ensuring that BNG is deliverable, measurable, monitored, enforced and secured over the long term.	The Plan includes revised policy wording and to the supporting text.

Policy NE3: Woodland, Trees and Hedgerows

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 127	**Support:** 100	**Neutral:** 11	**Object:** 16

Policy NE3 – Woodland, Trees and Hedgerows		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Supports Policy NE3. Suggests tree provision should be site-specific and that woodland/tree buffers should be informed by arboricultural reports and tree retention/protection plans.	• Comments noted. Policy wording already allows site-specific consideration of appropriate buffers and provision.	No further action required on buffer wording.
Natural England • Broadly supports the policy's aim to conserve, restore, manage and enhance woodland, trees and hedgerows. • Recommends native species where planting is primarily for biodiversity.	• Comments noted. Policy wording for native species is considered adequate.	No further action required
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**

No comments received.	n/a	n/a
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Uckfield Town Council • Objects and seeks stronger protection, including substantial buffers, lifetime protection, stronger enforcement, protection of RPAs and review of tree officer resources.	• Comments noted. A prescriptive universal buffer is not proposed, as this should be determined by site circumstances and arboricultural evidence. Enforcement and resourcing matters are noted.	No substantial policy change required. No prescriptive buffer standard to be added.
Mayfield and Five Ashes Council • Welcomes the policy but seeks clearer wording on loss, stronger replacement requirements, zero net loss, canopy cover standards and buffer zones.	• Comments noted. The policy requires appropriate protection and replacement planting, but detailed standards such as canopy cover targets and fixed buffer distances are not proposed.	No changes required.
Rotherfield District Council and Isfield Parish Council • Supports Policy NE3.	• Comment of support noted.	No changes required.
Heathfield and Waldron Parish Council • Supports Policy NE3, agrees with the tree provision threshold and supports a minimum buffer, suggesting 20 metres would be appropriate.	• Comments noted. Appropriate buffers should be determined by site-specific evidence rather than a fixed universal distance.	No fixed buffer distance to be added.

Horam Parish Council • Supports Policy NE3, agrees with the tree provision threshold and suggests any minimum buffer should be 25 metres.	• Comments noted. A prescriptive universal buffer is not proposed.	No fixed buffer distance to be added.
Withyham Parish Council • Supports Policy NE3, agrees with the tree provision threshold and seeks robust long-term monitoring and appropriate woodland buffer zones.	• Comments noted. The policy requires appropriate protection and long-term sustainable relationships with trees, woodland and hedgerows.	No further change required.
Polegate Town Council • Supports Policy NE3 and seeks stronger protection, larger buffers, native planting, stronger enforcement and protection when land is submitted through the SLAA/SHELAA process.	• Comments noted. Enforcement and wider tree protection concerns are noted, but detailed enforcement provisions are not required in this policy.	No further change required.
Westham Parish Council • Suggests the policy should focus on minimising biodiversity loss and offsetting unavoidable loss, noting replacement planting can take many years to mature.	• Comments noted. The policy seeks to protect existing features and secure appropriate mitigation, replacement and enhancement.	No further change required.

Buxted Parish Council • Requests careful checks of neighbouring trees omitted from plans and seeks minimum buffers and controls against destruction before applications are submitted.	• Comments noted. These matters are primarily addressed through application validation, assessment and enforcement processes.	No further change required.
Laughton Parish Council • Supports Policy NE3, suggests a minimum buffer would be helpful and asks that paragraph 7 includes trees felled before a planning application is made.	• Comments noted. A fixed buffer is not proposed; concerns about pre-application felling are noted.	No further change required.
Crowborough Town Council • Seeks greater emphasis on retaining historic trees and hedges and suggests County Council involvement before permission is granted.	• Comments noted. The policy already seeks to protect existing woodland, trees and hedgerows; consultation requirements are addressed through planning processes.	No further change required.
Maresfield Parish Council • Considers that developments destroying woodland, trees or hedgerows should not be allowed and that the policy and plan allocations may be in conflict.	• Comments noted. The policy should be read alongside the site assessment and wider Local Plan policies.	No further change required.

Frant Parish Council • Supports Policy NE3 and suggests the Council should be more proactive in applying TPOs where important trees are at risk.	• Comments noted. TPO matters are noted but do not require further detailed policy wording.	No further change required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Taylor Wimpey UK Ltd • Objects to criterion 6 as overly restrictive and seeks wording that better reflects tree quality, condition, amenity value and landscape contribution.	• Comments noted. The policy has been reviewed and streamlined and reworded.	No further change required.
Batcheller Monkhouse • Raises concerns about the prescriptive nature of criterion 7, how it interacts with BNG and whether off-site tree planting would create additional burdens.	• Comments noted. The policy has been reviewed and streamlined and reworded.	No further change required
ASP • Objects to Policy NE3, considers criterion 7 unjustified where no tree loss occurs and raises concerns about off-site delivery and minimum buffer requirements.	• Comments noted. If trees are not lost, the policy requirements would not apply. No prescriptive buffer is set; an appropriate buffer is required.	No further change required.

Rookwood Trinity Limited • Objects to Policy NE3 and considers it would have a disproportionate effect on smaller sites, seeking a clear mechanism for off-site contributions.	• Comments noted. The policy provides flexibility for off-site provision where on-site provision is not possible.	No further change required.
Real Select Limited • Objects to Policy NE3, noting that larger sites may accommodate tree planting more easily than smaller sites and that buffers should be site-specific.	• Comments noted. Tree planting and buffers should be considered having regard to site-specific circumstances.	No blanket buffer requirement to be introduced.
Grosvenor Property UK Limited • Supports Policy NE3 and suggests clearer replacement planting requirements, including one tree per dwelling or per 100sqm of non-residential floorspace, with case-by-case design flexibility.	• Comments noted. The policy already includes tree provision expectations and allows site-specific consideration.	No further change required.
Hertfordshire Holdings Tor & Co • Suggests that some policy content repeats national/local policy and that some material may be more	• Comments noted. The policy wording has been reviewed.	The policy wording has been reviewed and streamlined.

appropriate for validation checklist guidance.		
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
<u>Dicker Residents' Association, Village Concerns and Working Group Against Over Development/CPRE Sussex</u> • Generally support the policy, with requests for stronger replacement planting, minimum buffers, protection of rural character and better enforcement. **<u>Woodland Trust, RSPB, Sussex Wildlife Trust/BP and High Wealden National Landscape</u>** • Support the policy and recommend native/UK-sourced stock, right tree/right place principles, stronger replacement wording and avoiding planting on sensitive habitats. **<u>Other bodies</u>** • Raise matters including enforcement, protection of unregistered woodland,	• Comments noted. The policy already supports protection, restoration, management and enhancement of woodland, trees and hedgerows. Some detailed matters are more appropriately addressed through implementation, validation requirements, enforcement or other policies. The Policy is being reviewed on the whole and streamlined and a such the criterion number will reduce to 5.	General review and streamlining of the policy.

neighbouring-property trees, TPOs and long-term monitoring.		
Local Residents	**WDC Response**	**Changes made to policy/chapter**
• Mixed support and objection to Policy NE3. • Support for increasing tree and hedgerow cover, using native species and requiring one tree per dwelling where appropriate. • Concerns that the tree provision threshold may be too low, too prescriptive or unrealistic for all residential schemes. • Requests for minimum buffers, often around 20m, to deter pre-application felling and protect trees, hedgerows, soils and wider ecosystems. • Concerns that blanket buffers could conflict with site layouts, efficient land use and housing density. • Requests for stronger enforcement, more TPOs, protection of older/larger trees, and refusal where trees are felled before applications are submitted. • Suggestions to recognise coppice woodland, laid hedges, long-term care of newly planted trees and a wider ecosystem approach.	• Comments noted. The policy seeks to protect existing woodland, trees and hedgerows and secure appropriate replacement planting and enhancement. A prescriptive blanket buffer is not proposed, as protection should be proportionate and informed by site-specific evidence. Enforcement, TPOs and pre-application felling concerns are noted, but many of these matters are addressed through existing planning controls, enforcement powers or implementation rather than detailed policy wording.	No further changes required from local resident comments beyond the minor amendments identified above.

Policy NE4: Ancient Woodland and Veteran Trees

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 362	**Support:** 82	**Neutral:** 53	**Object:** 227

Policy Ref: NE4 – Ancient Woodland and Veteran Trees		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Strongly disagree with the policy wording on the target to minimise loss. • Consider the target contrary to national policy because development causing loss or deterioration of irreplaceable habitats should be refused unless wholly exceptional reasons and suitable compensation exist.	• Comments noted. The policy and supporting text in general have been streamlined. Changes have been made to Criterion 2 in relation to buffer distances taking account of good practice and wider representations received.	Criterion 2 in relation to the buffers has been amended.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Support draft Policy NE4. • Consider ancient woodland buffer depths should be informed by site-specific landscape, visual, arboricultural and biodiversity assessments.	• Comments noted. The policy and supporting text in general have been streamlined. Changes have been made to Criterion 2 in relation to buffer distances taking account of	Criterion 2 in relation to the buffers has been amended.

• Suggest buffer zones should be determined case-by-case.	good practice and wider representations received.	
Tunbridge Wells Borough Council • Support draft Policy NE4. • Support the adoption of a 25m buffer zone where there is no evidence that a smaller buffer would be adequate.	• Comments noted.	No action required.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Heathfield and Waldron Parish Council • Support draft Policy NE4 and a minimum buffer zone. • Consider full protection of ancient woodland vital to nature conservation. • Support deeper buffers in sensitive locations and object to leaving buffer decisions entirely case-by-case.	• Comments noted. The policy and supporting text in general have been streamlined. Deeper buffers may be required, depending on supporting site specific evidence. Changes have been made to Criterion 2 in relation to buffer distances taking account of good practice and wider representations received.	Criterion 2 in relation to the buffers has been amended.
Rotherfield Parish Council • Support draft Policy NE4 and a minimum buffer zone. • Agree NEFC Standing Advice should inform applications. • Support deeper buffers where justified, while recognising decisions may be challenged case-by-case.	• Comments noted. The policy and supporting text in general have been streamlined. Deeper buffers may be required, depending on supporting site specific evidence.Changes have been made to Criterion 2 in relation to buffer distances taking account of	Criterion 2 in relation to the buffers has been amended.

	good practice and wider representations received.	
Mayfield and Five Ashes Parish Council • Recommend including Natural England and Forestry Commission buffer guidance in the policy, with a minimum of 25m. • Recommend changing the monitoring target from "minimise loss" to "zero loss".	• Comments noted. The policy and supporting text in general have been streamlined. Changes have been made to Criterion 2 in relation to buffer distances taking account of good practice and wider representations received.	Criterion 2 in relation to the buffers has been amended.
Frant Parish Council • Support draft Policy NE4. • Suggest the policy should stipulate a minimum buffer distance, capable of being increased where circumstances require.	• Comments noted. The policy and supporting text in general have been streamlined. Deeper buffers may be required, depending on supporting site specific evidence.Changes have been made to Criterion 2 in relation to buffer distances taking account of good practice and wider representations received.	Criterion 2 in relation to the buffers has been amended.
Polegate Town Council • Support draft Policy NE4 and a minimum buffer of more than 25m. • Support deeper buffers for sensitive sites and case-by-case determination.	• Comments noted. The policy and supporting text in general have been streamlined. Deeper buffers may be required, depending on supporting site specific evidence.Changes have been made to Criterion 2 in relation to buffer distances taking account of	Criterion 2 in relation to the buffers has been amended.

• Suggest equivalent replacement for mature, ancient and veteran trees if felled and stronger TPO enforcement.	good practice and wider representations received.	
Horam Parish Council • Support draft Policy NE4 and a minimum buffer zone. • Support deeper buffers in sensitive areas. • Object to leaving buffer-zone determination case-by-case.	• Comments noted. The policy and supporting text in general have been streamlined. Deeper buffers may be required, depending on supporting site specific evidence.Changes have been made to Criterion 2 in relation to buffer distances taking account of good practice and wider representations received.	Criterion 2 in relation to the buffers has been amended.
Withyham Parish Council • Support draft Policy NE4 and a minimum 25m buffer, with increases where impacts extend further. • Support deeper buffers in sensitive locations. • Object to leaving buffer-zone determination wholly case-by-case.	• Comments noted. The policy and supporting text in general have been streamlined. Deeper buffers may be required, depending on supporting site specific evidence. Changes have been made to Criterion 2 in relation to buffer distances taking account of good practice and wider representations received.	Criterion 2 in relation to the buffers has been amended.
East Hoathly with Halland Parish Council • Suggest the Plan should emphasise the national importance of ancient woodland, including within the High Weald National Landscape.	• Comments noted. The policy and supporting text in general have been streamlined. Changes have been made to Criterion 2 in relation to buffer distances taking account of	Criterion 2 in relation to the buffers has been amended.

• Support a minimum 25m buffer, with larger buffers for smaller woodland blocks.	good practice and wider representations received.	
Maresfield Parish Council • Broadly support the policy. • Recommend the policy stipulates a minimum buffer distance that can be extended if justified.	• Comments noted. The policy and supporting text in general have been streamlined. Deeper buffers may be required, depending on supporting site specific evidence.Changes have been made to Criterion 2 in relation to buffer distances taking account of good practice and wider representations received.	Criterion 2 in relation to the buffers has been amended.
Buxted Parish Council • Support draft Policy NE4 and a minimum buffer, dependent on woodland quality. • Support deeper buffers in sensitive locations. • Suggest greater reliance on map regression where ancient woodland previously extended beyond current boundaries. • Agree case-by-case determination may be appropriate.	• Comments noted. The policy and supporting text in general have been streamlined. Deeper buffers may be required, depending on supporting site specific evidence. Changes have been made to Criterion 2 in relation to buffer distances taking account of good practice and wider representations received.	Proposed policy change above. No further action.
Laughton Parish Council • Support draft Policy NE4. • Agree a minimum buffer can be a starting point, with no one-size-fits-all approach. • Support deeper buffers in sensitive locations.	• Comments noted. The policy and supporting text in general have been streamlined. Changes have been made to Criterion 2 in relation to buffer distances taking account of	Criterion 2 in relation to the buffers has been amended.

	good practice and wider representations received.	
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Nevill Estate Company and The Marquess of Christopher Abergavenny • Object to the assumed minimum 25m buffer. • Suggest the policy should delete reference to 25m and introduce a 15m offset in line with Natural England and Forestry Commission Standing Advice.	• Comments noted. The policy and supporting text in general have been streamlined. Smaller buffers can be achieved where supporting site specific evidence justifies this approach.	Policy clarified to say smaller buffers can be achieved where robust evidence justified that approach.
Esquire Developments and TWRFC • Object to Policy NE4. • Consider part 2 should specifically refer to ancient woodland to avoid ambiguity. • Consider the 25m buffer exceeds national guidance and is not justified by evidence. • Raise concern that increased buffers may reduce developable land and affect housing delivery and viability.	• Comments noted. The policy and supporting text in general have been streamlined. Smaller buffers can be achieved where supporting site specific evidence justifies this approach.	Policy clarified to say smaller buffers can be achieved where robust evidence justified that approach.
Persimmon Homes, Stantec and Home Builders Federation • Object to Policy NE4. • Consider the policy goes beyond national policy through enhanced buffers and restrictions on development within buffers.	• Comments noted. The policy and supporting text in general have been streamlined. Smaller buffers can be achieved where supporting site specific evidence justifies this approach.	Policy clarified to say smaller buffers can be achieved where robust evidence justified that approach.

• Consider the supporting text takes too narrow a view of exceptional circumstances and is unjustified/inconsistent with national policy.		
Wates Development • Support protection for ancient woodland and veteran trees but object to the minimum 25m buffer. • Consider the 15m buffer remains appropriate and consistent with current guidance.	• Comments noted. The policy and supporting text in general have been streamlined. Smaller buffers can be achieved where supporting site specific evidence justifies this approach.	Policy clarified to say smaller buffers can be achieved where robust evidence justified that approach.
Real Select Ltd • Object to Policy NE4. • Consider the inner 15m should be free from construction, while low-impact infrastructure could be allowed in the outer 10m on a case-by-case basis.	• Comments noted. The policy and supporting text in general have been streamlined. Smaller buffers (15m minimum) can be achieved where supporting site specific evidence justifies this approach.	Policy clarified to say smaller buffers can be achieved where robust evidence justified that approach.
Taylor Wimpey UK Ltd • Object to criterion 2 and the assumed 25m buffer, which they consider unjustified and inconsistent with Standing Advice. • Suggest deeper buffers should be assessed site-by-site. • Agree buffer-zone determination should be case-by-case.	• Comments noted. The policy and supporting text in general have been streamlined. Smaller buffers can be achieved where supporting site specific evidence justifies this approach.	Policy clarified to say smaller buffers can be achieved where robust evidence justified that approach.
Greymoor Homes	• Comments noted. The policy and supporting text in general have been streamlined. Smaller buffers can be	Policy clarified to say smaller buffers can be achieved where robust evidence justified that approach.

• Suggest the policy's buffer approach and supporting text are not justified and are inconsistent with national policy.	achieved where supporting site specific evidence justifies this approach.	
Grosvenor Property UK Limited • Support Policy NE4 in principle. • Suggest buffer zones should be determined case-by-case. • Note North West Hailsham proposals would provide 50m buffers around ancient woodland clusters.	• Comments noted. Buffers should be justified by site specific evidence, in the absence of such evidence, 25m is assumed based on the policy provisions.	Policy clarified to say smaller buffers can be achieved where robust evidence justified that approach.
Statkraft UK Ltd • Object to the minimum 25m buffer approach. • Suggest a 15m minimum buffer should be the starting point, with larger buffers required where impacts justify them.	• Comments noted. Buffers should be justified by site specific evidence, in the absence of such evidence, 25m is assumed based on the policy provisions.	Policy clarified to say smaller buffers can be achieved where robust evidence justified that approach.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Village Concerns • Support Policy NE4 but recommend minimum ancient woodland buffers of 30m and 50m. • Support deeper buffers in sensitive locations and object to wholly case-by-case buffer determination. • Suggest survey, monitoring and management requirements for ancient woodland affected by development.	• Comments noted. It is not considered justified to have buffers at the threshold suggested in this comment.	No change proposed.

Clarity Ecoworks • Support Policy NE4 and a minimum buffer zone. • Support deeper buffers in sensitive locations and case-by-case buffer determination.	• Comments noted. Deeper buffers may be required, depending on supporting site specific evidence.	No change proposed.
BP • Support Policy NE4 and a minimum buffer zone to protect countryside and established woodland.	Comments noted.	No change proposed.
The Working Group Against Over Development and CPRE Sussex • Support Policy NE4. • Suggest SuDS features should be included in the examples of infrastructure excluded from buffer zones. • Support Woodland Trust recommendations and a case-by-case approach subject to a minimum 25m buffer.	Comments noted. SUDS are not exempt as they are not national infrastructure projects as outline in para. 6.74 of the supporting text	No change proposed.
Dicker Residents Assoication • Support Policy NE4 and a minimum buffer zone.	Comments noted.	No action required.
Greenbank • Support Policy NE4 and a minimum buffer, dependent on woodland quality. • Support deeper buffers in sensitive locations and case-by-case determination.	• Comments noted. Deeper buffers may be required, depending on supporting site specific evidence.	No change proposed.

Conservators of Ashdown Forest • Support Policy NE4. • Suggest the policy should specify increased buffer zones for sensitive sites.	• Comments noted. Deeper buffers may be required, depending on supporting site specific evidence.	No change proposed.
CIHT • Agree with draft Policy NE4.	Comments noted.	No action required.
Sussex Wildlife Trust • Support Policy NE4 and the minimum 25m buffer. • Support deeper buffers in sensitive locations. • Suggest hydrological impacts on ancient woodland should be specifically referenced.	• Comments noted. Deeper buffers may be required, depending on supporting site specific evidence.	No change proposed.
Transport Futures East Sussex • Agree with the policy principles. • Support recognition that nature recovery and biodiversity net gain require consideration of natural systems as a whole.	Comments noted.	No further action.

Local Residents	**WDC Response**	**Changes made to policy/chapter**
• Support was expressed for draft Policy NE4 and the principle of protecting ancient woodland, ancient, aged and veteran trees. • Residents suggested the policy should set a clear minimum buffer zone to protect ancient woodland, with many supporting a 25m	• Comments noted. The policy and supporting text in general have been streamlined. Changes have been made to Criterion 2 in relation to buffer distances taking account of	Policy and supporting text wording amended based on a number of comments made here and above.

minimum and others recommending larger buffers of 30m, 35m, 50m or 50–100m. • It was suggested that a minimum buffer would provide clarity for developers, protect ecological integrity, reduce indirect impacts such as light, noise, microclimate change and disturbance, and help protect biodiversity within the High Weald landscape. • Some residents considered a 25m buffer insufficient, noting risks to woodland health, roots, canopy overhang, surrounding habitats, erosion and flooding. • Support was expressed for deeper buffers on sloping sites, land with ghyll streams, smaller woodland blocks, sensitive habitats and areas where woodland is a fragment of a wider historic ancient woodland block. • Residents raised both support and objection to determining buffer zones case-by-case. Some supported flexibility for especially sensitive sites, while others considered that a clear minimum standard is needed to avoid inconsistent decisions and reduce legal risk. • It was suggested that the best approach would combine minimum buffer zones with site-specific adjustments informed by ecological, hydrological and topographical evidence. • Residents suggested the policy should require broader analysis of ecosystems linked to ancient woodland, including direct and indirect impacts, climate change resilience,	good practice and wider representations received.	

hydrological impacts, habitat connectivity and wildlife corridors. • Several residents objected to any development affecting ancient woodland and suggested development causing direct or indirect loss or deterioration of ancient woodland, ancient, aged or veteran trees should not be permitted except in critical or exceptional circumstances. • Concerns were raised that the policy should place greater emphasis on enforcement, including regular inspections, sanctions for tree felling before applications are submitted, fines for unauthorised felling, stronger protection for TPOs and reinstatement through replanting and restoration of ghylls and hedgerows. • Residents suggested smaller woodland blocks, particularly those under 10 hectares, should have stronger protection, including buffers of at least 50m to safeguard habitat recovery. • Comments referred to site-specific concerns including Horam, Maresfield and strategic allocations near ancient woodland, and suggested that development boundaries should not cover ancient woodland or hedgerows. • Some residents suggested the policy should address ancient woodland as part of wider climate change adaptation, flood mitigation, carbon sequestration and ecological network connectivity.		

• It was also suggested that a separate policy giving birds greater protection should be considered, with ancient woodland referenced within it.		

Policy NE5: Ashdown Forest SPA and SAC

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 116	**Support:** 52	**Neutral:** 11	**Object:** 53

Policy NE5: Ashdown Forest SPA		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Welcomes Policy NE5 but notes that strategic SANG provision to support planned growth has not yet been secured. • Advises that the location and nature of SANG should be identified and agreed before Local Plan submission. • States that the HRA must demonstrate no adverse effect on the integrity of Ashdown Forest SPA and SAC.	• Comments noted. The Council has continued to work with Natural England on the HRA, strategic mitigation, SANG provision and air quality matters to ensure the Plan demonstrates no adverse effect on the Ashdown Forest SPA/SAC.	The policy and supporting text has been reviewed and evidence on strategic SANG provision has been provided and HRA/air quality requirements are clearly reflected.

• Advises that air quality impacts from allocations must be addressed through the Plan and site-specific HRA.		
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tunbridge Wells Borough Council • Supports the policy and notes consistency with the emerging TWBC Local Plan. • Agrees with the HRA methodology and conclusions. • Notes that insufficient SANG sites have currently been identified to support planned growth. • Encourages continued cross-boundary collaboration on SANG sites and inclusion in the Statement of Common Ground.	• Support noted. The Council has continued joint working with neighbouring authorities on strategic mitigation, SANG delivery and cross-boundary matters.	The policy and supporting text has been reviewed and evidence on strategic SANG provision has been provided and HRA/air quality requirements are clearly reflected.
South Downs National Park Authority • Supports joint transport and air quality modelling work at Ashdown Forest. • Notes the HRA conclusion of no ecologically significant effect from traffic growth. • Supports the requirement for site-specific HRA to assess and prevent adverse effects in relation to international sites and air quality.	• Support noted. The policy approach to site-specific HRA and air quality assessment is retained.	No action required.
Other Consultee Bodies	**WDC Response**	**Proposed Change to Policy**
Conservators of Ashdown Forest • Seek stronger protection within the 7km Zone of Influence, including tighter restrictions on	• Comments noted. The Council has continued to work with Natural England on the HRA, strategic mitigation, SANG provision and air quality matters to ensure the Plan demonstrates no	The policy and supporting text has been reviewed and evidence on strategic SANG provision has been provided and HRA/air

development, light pollution controls, clearer 400m exclusion zone wording, and consideration of a similar policy for Pevensey Levels SAC.	adverse effect on the Ashdown Forest SPA/SAC. Revised policy wording has been made.	quality requirements are clearly reflected. .
Sussex Wildlife Trust • Support the policy but want the title to reference the SAC, prohibit SANGs within Ancient Woodland, and consider a standalone policy for Pevensey Levels SAC.	• Comments noted. The tile of the policy will now include the SAC. No standalone policy required.	The title of the policy now includes SAC.
Village Concerns • Request clearer definitions of policy terms, transparency on case-by-case assessments, and evidence on what level of traffic or harm would trigger mitigation requirements.	• Comments noted. he Council has continued to work with Natural England on these matters.	No changes proposed.
Clarity Ecoworks • Argues the 7km Zone of Influence is outdated and that the 400m exclusion zone alone is sufficient.	• Comments noted. But this approach is not supported by evidence. The zone of influence remains.	No changes proposed.
Transport Futures East Sussex • Support the policy and its wider approach to nature recovery, biodiversity net gain, and ecological networks.	• Comments noted.	No further changes required.
CPRE and the Working Group Against Overdevelopment	Comments noted. The HRA is considered to meet the necessary requirements and has been updated to support the Regulation 19 Plan. .	No changes proposed.

• Consider the supporting Appropriate Assessment inadequate and legally deficient, but do not seek changes to the policy itself.		
BP • Support the policy	• Comments noted.	No changes required.
RSPB • Strongly support the policy, including the 400m exclusion zone, SAMM and SANG requirements, but seek policy wording to prevent SANGs being located within Ancient Woodland.	• Comments noted. Natural England guidance is clear as to what can constitute a SANG. This does not need to be repeated in this Local Plan policy.	No changes required.
Construction Industry • Questions whether major planned growth around Uckfield is compatible with protecting Ashdown Forest and highlights a potential policy conflict.	• Comments noted.	The policy and supporting text have been reviewed and evidence on strategic SANG provision has been provided.
Greenbank • Questions the impact of any future A22 dualling through Ashdown Forest, suggesting it could undermine environmental protections.	• Comment noted. Strategic transport proposals and associated environmental effects will be considered through the relevant evidence, HRA and transport assessment processes. •	No changes required.

The Horder Centre Healthcare, Crowborough • Requests a site-specific policy to support future healthcare expansion while recognising the site's sensitive location close to Ashdown Forest.	• Comments noted. This is not considered necessary.	No action required.
Dicker Residents Association • Agree with the policy	• Support noted.	No action required.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Heathfield and Waldron Parish Council • Agrees with the policy.	• Support noted.	No action required.
Polegate Town Council • Agrees with the policy and asks that it is strengthened as much as possible due to the biodiversity and habitat value of Ashdown Forest.	• Support noted. The policy seeks to protect the SPA through avoidance and mitigation measures.	No substantive policy change required.
Mayfield and Five Ashes Parish Council • Considers the policy positive but provides no specific comments.	• Support noted.	No action required.
Frant Parish Council • Agrees with the policy.	• Support noted.	No action required.
Horam Parish Council	• Comment noted. The policy already requires site-specific HRA where development may	No change require

• Requests that Policy NE5.7 is reworded to state that all new development will result in increased traffic and should therefore be assessed through a site-specific HRA.	affect Ashdown Forest, including through traffic and air quality impacts.	
Withyham Parish Council • Notes that Withyham Parish lies within/close to Ashdown Forest SPA and stresses that the Plan must ensure development has no adverse effects on the integrity of Ashdown Forest or surrounding villages.	• Comment noted. Policy NE5 and the HRA seek to ensure that development avoids adverse effects on the integrity of Ashdown Forest SPA/SAC.	No specific policy change required.
Isfield Parish Council • Broadly supports the policy and 400m buffer zone, but is not convinced by the use of SANGs as mitigation for residential development within the 7km Ashdown Forest Protection Zone.	• Support and concerns noted. SANG provision forms part of the strategic mitigation approach and is supported by appropriate evidence and delivery mechanisms.	No specific policy change required.
Laughton Parish Council • Agrees with the policy.	• Support noted.	No action required.
Buxted Parish Council • Raises concern that dualling the A22 across Ashdown Forest has not been addressed and that any proposed buffer zone could be undermined if such an upgrade were pursued.	• Comment noted. Strategic transport proposals and associated environmental effects will be considered through the relevant evidence, HRA and transport assessment processes.	No change required.

Maresfield Parish Council • Supports the policy and the 400m buffer zone.	• Support noted.	No action required.
Rotherfield Parish Council • Emphasises that exceptions must be genuinely exceptional. Requests reference to the loss of other natural green spaces/woodlands, which can increase pressure on Ashdown Forest, and notes potential conflict with tourism supporting the rural economy.	• Comments noted. The policy seeks to maintain a precautionary approach to development affecting Ashdown Forest while balancing wider planning considerations. The interaction between recreational pressure, alternative greenspace and rural tourism can be considered through supporting text and evidence.	No action required.

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents • General support for protecting Ashdown Forest, including support for the 400m buffer and clearer curtilage-based measurement. • Concerns that the 7km zone should be reinstated or strengthened to restrict residential, commercial, industrial and HGV-generating development. • Concerns that SANGs may not be effective where residents live closer to Ashdown Forest than to alternative greenspace, and that SANGs should avoid ancient woodland and be better monitored.	• Comments noted. Policy NE5 is supported by the HRA and seeks to ensure development does not adversely affect the integrity of Ashdown Forest SPA/SAC. The Council has reviewed evidence on recreational pressure, SANG/SAMM provision, air quality, traffic and cumulative effects. Detailed mitigation, monitoring and site-specific HRA requirements are set out through the policy, supporting text, strategic mitigation work and planning application process.	• The policy and supporting text have been generally reviewed and evidence on strategic SANG provision has been provided and HRA/air quality requirements are clearly reflected.

• Requests for updated visitor surveys, monitoring of parking charges, SANG use, visitor numbers, dog numbers, traffic, air quality and cumulative impacts. • Concerns about increased traffic, HGVs, air pollution, noise, light pollution, Gatwick-related impacts, industrial expansion and development around Uckfield/Crowborough affecting the SPA/SAC. • Requests for stronger ecological connectivity, BOA/LNRS recognition, habitat corridors, climate resilience, water quality protection and protection of heritage/geodiversity links to Ashdown Forest. • Requests for clearer dog control, recreation management, education, visitor management, ranger funding and enforcement to manage impacts such as litter, fires, cycling, camping and disturbance of ground-nesting birds. • Some objections to the principle of the policy, including that protection is disproportionate, shifts growth pressure elsewhere, or lacks scientific justification for the 7km zone.		

Policy NE6: Landscape Character

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 102	**Support:** 50	**Neutral:** 10	**Object:** 42

Policy NE6: Landscape Character		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Welcomes the commitment that all new developments adopt a landscape-led approach from the outset, ensuring landscape impacts are avoided before mitigation is considered.	• Comment noted. Support for the landscape-led approach is welcomed.	No action required.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Supports Policy NE6 and suggests blue infrastructure should be considered under point 5, cross-referring to comments on Policy S10.	• Comment noted. Blue infrastructure has been considered in relation to the wider policy framework.	No action required.

Town/Parish Councils	WDC Response	Changes made to policy/chapter
Rotherfield Parish Council • Supports draft Policy NE6.	• Comment noted. Support is welcomed.	No action required.
Polegate Town Council • Supports retaining landscape character and ensuring development fits with surroundings, including countryside context and nearby dwellings.	• Comment noted. Policy NE6 seeks to ensure development responds appropriately to landscape character.	No action required.
Laughton Parish Council • Supports Policy NE6 but considers the reference to "relevant development proposals" should be clarified so that the policy applies to all development proposals.	• Comment noted. The wording has been updated.	Policy has been amended to remove the reference to 'relevant'
Horam Parish Council • Supports Policy NE6 but asks that Neighbourhood Plan landscape policies and evidence base are referenced in Policy NE6.2. Also raises concern that Figure 21 is unclear because the AONB/National Landscape overlay changes the underlying landscape character colours and suggests cross-hatching instead.	• Comment noted. Neighbourhood Plan policies sit alongside the Local Plan and do not need to be specifically referenced in this policy. Mapping presentation comments are noted.	No policy change required in relation to Neighbourhood Plan references.

Withyham Parish Council • Considers that all of the landscape elements which development could impact, either alone or cumulatively, have been identified and that no change is required.	• Comment noted. Support for the scope of the identified landscape elements is welcomed.	No action required.
Mayfield and Five Ashes Parish Council • Notes that the question appears to refer to point 4 rather than point 3 of the policy. Suggests sub-paragraph 4(p), relating to roads, footways, cycle routes, Public Rights of Way and Bridleways, should be enhanced to encourage development proposals compatible with existing road infrastructure.	• Comment noted. The correction regarding the policy reference is acknowledged. Transport and infrastructure compatibility are considered through the wider Local Plan policy framework.	No policy change required.
Isfield Parish Council • Broadly supports draft Policy NE6.	• Comment noted. Support is welcomed.	No action required.
Buxted Parish Council • Supports Policy NE6 but raises concern that where development falls within or near two character areas, the policy may fail. Suggests further studies may be needed for geology, hydrology, biodiversity and possible nature reserves, and that the LUC Wealden Landscape Character Assessment should be taken into account. Also suggests redefining	• Comment noted. Site-specific landscape issues and evidence will be considered where relevant. The Local Plan cannot redefine the boundary of a nationally designated landscape.	No policy change required.

the High Weald AONB boundary around North Uckfield and parts of Buxted.		
Frant Parish Council • Broadly supports the thrust of Policy NE6 but considers it should be stronger by making clear that development must conserve important landscape character or it will not be supported. Also seeks detailed, site-specific assessments, suggests Part 1 is potentially contradictory regarding avoidance and mitigation, and asks that Part 4 includes views in, around, within and to and from areas of landscape.	• Comment noted. The policy provides sufficient clarity on landscape-led design, the role of mitigation and the assessment of views, while remaining proportionate and consistent with national policy.	No policy change required.
Heathfield and Waldron Parish Council • Supports Policy NE6 subject to clarification that the question should refer to point 4 rather than point 3. Suggests the list of landscape elements should include ridge-top and elevated sites, probably after point 4(l).	• Comment noted. The correction to the question reference is acknowledged. Ridge-top and elevated sites are considered to be covered by existing landscape character considerations.	No policy change required.
Maresfield Parish Council • Broadly supports Policy NE6 but considers it should be more robust so that all development conserves landscape character or is not supported. Requests bespoke, detailed and site-specific assessments rather than reliance	• Comment noted. The request for clearer policy wording, site-specific assessment and consideration of views is noted.	The policy has been reviewed generally and streamlined where relevant.

on broad landscape evidence, raises concern about wording on avoidance and mitigation, and asks that Part 4 includes views in, around, within and to and from areas of landscape.		
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Tor and Co on behalf of Hertfordshire Holdings • Considers the policy does not explain what "landscape-led" or "having regard to" assessments means in practice, and raises concern that requirements could be onerous or uncertain without clear validation guidance.	• Comment noted. It is appropriate to provide sufficient clarity on the evidence expected from applicants, while avoiding unnecessary duplication with validation guidance.	The policy has been reviewed generally and streamlined where relevant.
Gladman Developments Limited • Raises concern over terminology such as "valued views" and "valued landscape features", suggesting views should only be protected where demonstrable physical attributes elevate their importance beyond the ordinary.	• Comment noted. The policy wording is sufficiently clear and proportionate when referring to valued landscape features and views.	The policy has been reviewed generally and streamlined where relevant.
Ceres Property on behalf of Orchestra Land • Questions reliance on Biodiversity Opportunity Areas identified in 2008, noting that the evidence may be dated and not necessarily robust for determining development suitability.	• Comment noted. The evidence base and biodiversity policy context will be considered alongside up-to-date ecological and landscape information where relevant.	No action required.

Stantec on behalf of Grosvenor Property UK Limited • Supports Policy NE6 but suggests the Wealden Landscape Evidence Base should be updated to reflect their comments, with policy wording amended accordingly. Notes that North West Hailsham proposals will adopt a landscape-led approach.	• Comment noted. Site-specific and evidence-base comments have been considered through the wider plan-making process. This will take account of up to date landscape character work.	No action required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Dicker Residents Association • Supports Policy NE6 and agrees with the identified landscape elements, but considers the Low Weald should receive equal status and protection alongside the chalk downland and High Weald.	• Comment noted. The policy seeks to recognise the importance of landscape character across the district.	No action required.
Village Concerns • Objects to Policy NE6, questions the effectiveness of landscape character considerations in decision-making, and asks that the policy be given more “teeth”.	• Comment noted. The policy is intended to provide a clear framework for considering landscape character in development proposals.	The policy has been reviewed generally and streamlined where relevant.
The Working Group Against Over Development / CPRE Sussex • Considers the policy covers relevant landscape elements but seeks stronger	• Comment noted. The relationship between landscape character areas, national policy and designated landscapes is considered through the wider policy framework.	The policy has been reviewed generally and streamlined where relevant.

protection for Character Areas 6D and 6E, including reference to NPPF paragraphs 182 and 183, and raises concern about rigorous application by Development Management.		
Conservators of Ashdown Forest • Notes that activities beyond built development, such as tree planting, woodland regeneration and gorse growth, can affect views, vistas and landscape character, and asks whether such impacts can be referenced.	• Comment noted. The Local Plan primarily addresses development, but supporting text recognises wider landscape management considerations where relevant.	No action required. Paragraph 9.65 within the supporting text covers this.
Rotherfield Protection Group • Supports Policy NE6 but seeks clarification that the policy applies to all development proposals, not only "relevant" proposals. Highlights local survey support for countryside and High Weald protection.	• Comment noted. The wording has been updated.	Policy has been amended to remove the reference to 'relevant'
Transport Futures East Sussex • Supports the policy principles and descriptors, but notes that aspirations would be aided by reductions in private motor vehicle use.	• Comment noted. Transport-related matters are also addressed through other policies in the Local Plan.	No action required.
National Trust • Supports Policy NE6, including recognition of the contribution of landscape to the environment and economy, the inclusion of	• Comment noted. Support is welcomed.	No action required.

tourism, and consideration of historic character, landscape setting, heritage assets and cumulative impacts.		
Clarity Ecoworks • Supports Policy NE6 and considers no change is required.	• Comment noted. Support is welcomed.	No action required.
CIHT • Supports Policy NE6.	• Comment noted. Support is welcomed.	No action required.
Greenbank • Supports the policy provided it is adhered to but raises concern about development near boundaries between character areas, evidence gaps and possible need to redefine High Weald AONB boundaries around North Uckfield and Buxted.	• Comment noted. The policy will be applied alongside relevant landscape evidence and site-specific assessment where appropriate. The local plan cannot amend the boundaries to a nationally designated landscape.	No action required.

Local Residents	WDC Response	Changes made to policy/chapter
• Many residents support Policy NE6 and welcome a landscape-led approach. • Several residents consider the policy needs strengthening so landscape character has greater weight in decision-making and fewer opportunities for developers to avoid requirements.	• Comments noted. The issues raised by local residents overlap with comments from other consultees regarding policy clarity, evidence requirements, landscape sensitivity and the strength of protection afforded by Policy NE6.	The policy has been reviewed generally and streamlined where relevant.

• Concerns were raised that the policy should clarify what “landscape-led” means and when site-specific landscape and visual impact assessments are required. • Residents requested clearer protection for the High Weald National Landscape/AONB, land adjacent to the South Downs National Park, Pevensey Levels, ridge/elevated sites and sensitive views. • Several comments asked for additional landscape elements to be recognised, including ecological connectivity, historic and cultural features, hydrology, night skies/light pollution, settlement pattern and distinctive architecture. • Some residents queried whether the 2022 landscape evidence is too broad-brush and asked for bespoke site-specific assessment. • Residents also noted concerns around long-term management, enforcement, cumulative impacts and the application of the policy in practice.		

Policy NE7: High Weald National Landscape

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 109	**Support:** 52	**Neutral:** 8	**Object:** 48

Policy NE7 – High Weald National Landscape		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Broadly supports Policy NE7 but recommends that Part 5 explicitly requires a landscape and visual impact assessment where development may affect the statutory purpose of the National Landscape. Highlights the strengthened duty under the Levelling Up and Regeneration Act 2023 to seek to further the conservation and enhancement of natural beauty.	• Comments noted. It is appropriate to clarify that proposals should provide sufficient information, including landscape and visual impact assessment where relevant, to demonstrate how impacts on the National Landscape have been considered.	Amended the wording at part 4 of the policy.
High Weald National Landscape Unit • Generally supports the policy, including references to the AONB Management Plan, landscape-led design, settlement patterns, tranquillity and dark skies. Recommends	• Comments noted. The policy has been streamlined by removing duplication and the supporting material can be reviewed to ensure the National Landscape boundary is	Updated wording criterion 2g of the policy.

deleting point 2 as it duplicates point 1 and suggests including a map showing the High Weald National Landscape boundary. Notes the strengthened statutory duty under the Levelling Up and Regeneration Act 2023.	clearly identified. The strengthened statutory duty will be reflected in the policy wording.	
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tunbridge Wells Borough Council • Considers criterion 1 may be too restrictive because it requires development to conserve and enhance natural beauty. Suggests wording that requires development to make a positive contribution to furthering the statutory purposes of the area.	• Comment noted.	Criterion 2g of the policy is revised.
East Sussex County Council • Agrees with the policy.	• Support noted.	No action required.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council • Suggests adding "in accordance with policy NE10" to paragraph 3(f) and amending both monitoring indicator targets in Chapter 14 to zero.	• Comments noted. The plan is read as a whole so cross-referencing is not necessary. Monitoring indicators have been reviewed separately as part of the monitoring framework.	Review monitoring indicators separately. No further action required.
Polegate Town Council • Requests that any development is in keeping with local surroundings.	• Comment noted. The policy already seeks landscape-led design and requires regard to character, special	No action required.

	qualities and the High Weald Management Plan.	
Frant Parish Council • Agrees with the policy.	• Support noted.	No action required.
Withyham Parish Council • Agrees with the policy.	• Support noted.	No action required.
Isfield Parish Council • Agrees with the policy.	• Support noted.	No action required.
Maresfield Parish Council • Agrees with the policy.	• Support noted.	No action required.
Rotherfield Parish Council • Agrees with the policy.	• Support noted.	No action required.
Horam Parish Council • Requests stronger wording by replacing "Have regard to" with "Follow" in NE7.3c, and "taking into account" with "conforming with" in NE7.5, to ensure the High Weald Management Plan and design guide take precedence.	• Comments noted. The wording has been generally reviewed and this ensure sufficient weight is given to the Management Plan and Design Guide while retaining appropriate flexibility for decision-making.	No further action required.
Buxted Parish Council	• Comment noted. Infill development would need to be assessed against the development plan as a whole,	No action required.

• Requests careful consideration of where infill development may be appropriate within settlements in the landscape.	including landscape character and National Landscape policies.	
Heathfield and Waldron Parish Council • Suggests NE7.3c should be stronger, using "Will comply with" rather than "Have regard to", and objects to "where relevant" because the Design Guide should apply throughout the High Weald National Landscape.	• Comments noted. The wording has been generally reviewed and this ensure sufficient weight is given to the Management Plan and Design Guide while retaining appropriate flexibility for decision-making.	No further action required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Nevill Estate Company • Considers Policy NE7 overly protectionist and insufficiently flexible to support rural communities, jobs, farm diversification, tourism and recreation. Requests exceptions or flexibility for farms, rural buildings, previously developed or damaged rural sites and rural economic uses.	• Comments noted. The policy balances support for rural communities and diversification with the statutory purpose of the National Landscape and national policy protections.	No action required.
The Marquess of Christopher Abergavenny • Similar response as Nevill Estate Company: seeks greater flexibility for rural communities, diversification, tourism, recreation and rural economic uses within the High Weald.	• Comments noted. The policy balances support for rural communities and diversification with the statutory purpose of the National Landscape and national policy protections.	No action required.

Beal's Farm Charcuterie • Similar response as Nevill Estate Company: seeks greater flexibility for rural communities, diversification, tourism, recreation and rural economic uses within the High Weald.	• Comments noted. The policy balances support for rural communities and diversification with the statutory purpose of the National Landscape and national policy protections.	No action required.
KLW • Similar response as Nevill Estate Company: seeks greater flexibility for rural communities, diversification, tourism, recreation and rural economic uses within the High Weald.	• Comments noted. The policy balances support for rural communities and diversification with the statutory purpose of the National Landscape and national policy protections.	No action required.
Gladman Developments Limited • Notes that the National Landscape designation does not automatically rule out development, but objects to the undefined requirement that development should be "limited in scale". Suggests deleting this phrase.	• Comment noted.	Amended reference to "limited in scale" and criterion 2a now states: *'be appropriate in scale, extent, nature and location'*
Esquire Development and Tunbridge Wells Rugby Football Club • Comments that the allocation of land for residential development within the High Weald National Landscape demonstrates that the principle of development is acceptable where	• Comments noted. Any allocation or proposal within the National Landscape must be justified through the evidence base and assessed against national policy and Policy NE7.	No specific policy change required.

evidenced, including through landscape and visual assessment.		
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Village Concerns • Agrees with the policy.	• Support noted.	No action required.
Dicker Residents Association • Agrees with the policy.	• Support noted.	No action required.
BP • Agrees with the policy.	• Support noted.	No action required.
Chartered Institute of Highways & Transportation • Agrees with the policy.	• Support noted.	No action required.
Construction Industry • Agrees with the policy.	• Support noted.	No action required.
The Working Group Against Overdevelopment • Supports the policy but suggests it should also apply to all sites within Landscape Character Areas 6D and 6E, with amended wording to include development within or affecting the setting of those areas.	• Comment noted. The scope of Policy NE7 relates specifically to the High Weald National Landscape. Landscape Character Areas are addressed through wider landscape policy.	No change to extend Policy NE7 beyond the National Landscape.
CPRE • Similar response as The Working Group Against Overdevelopment: supports the policy but	• Comment noted. The scope of Policy NE7 relates specifically to the High Weald National Landscape.	No change to extend Policy NE7 beyond the National Landscape.

seeks its extension to Landscape Character Areas 6D and 6E.	Landscape Character Areas are addressed through wider landscape policy.	
Transport Futures East Sussex • Agrees with the principles and descriptors, but notes that the policy's aspirations would be aided by reductions in private motor vehicle numbers and use.	• Comment noted. Sustainable transport objectives are addressed through other policies in the Plan and should be considered alongside Policy NE7 where relevant.	No direct change to Policy NE7 required.
Clarity Ecoworks • Considers that landscape beauty should be protected across the Weald on a case-by-case basis wherever features occur, and that High Weald protection could be addressed under Policy NE6 Landscape Character.	• Comment noted. Policy NE7 provides specific protection for the designated National Landscape, while Policy NE6 addresses wider landscape character.	No action required.
Uckfield Community Technology College • Requests stronger protection and suggests adding sections for the Low Weald and Pevensey. Argues that areas such as Maresfield, Buxted and north Uckfield form part of the wider High Weald Natural England Character Area and should be incorporated into landscape designation.	• Comment noted. Policy NE7 applies to the designated High Weald National Landscape. Wider landscape character areas and National Character Areas are addressed through other parts of the Plan and evidence base.	No change to the scope of Policy NE7.
Greenbank	• Comment noted. Infill development would need to be assessed against	No action required.

• Requests careful consideration of where infill development may be appropriate within settlements in the landscape.	the development plan as a whole, including landscape character and National Landscape policies.	
Rotherfield Protection Group • Does not consider the policy should be changed. Notes that footnote 98 appears incorrect and should refer to NPPF paragraphs 182 and 183. Refers to survey responses showing strong support for countryside protection and brownfield/infill-only development.	Support and detailed comments noted.	Update NPPF paragraph references checked.
Cross in Hand Amenities Society • Supports policy proposals that would enhance protection for the High Weald National Landscape, particularly in relation to Darch's Wood and ancient woodland.	• Support noted. Ancient woodland protection is also addressed through relevant biodiversity and woodland policies.	No action required.

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents • General support for protecting the High Weald National Landscape, with calls for the highest level of protection and stronger enforcement.	• Comments noted. The policy will continue to provide strong protection for the High Weald National Landscape and will be reviewed to ensure it properly reflects national	Policy NE7 reviewed to strengthen references to the statutory duty, landscape and visual assessment, High Weald Management Plan and Design Guide, and the protection of key landscape features.

• Requests for stronger wording so the High Weald Management Plan and Housing Design Guide are followed or complied with, rather than merely had regard to. • Concerns that protected views, ancient woodland, hedgerows, open heaths, dark skies, ridge development and other key landscape features require clearer and stronger protection. • Concerns that the draft Local Plan site selection and major housing allocations may conflict with the purpose of protecting the National Landscape, particularly where greenfield development is proposed. • Requests for clearer development guidelines on scale, location, design, materials, building heights and visual impact. • Support for prioritising brownfield sites, infill and reuse of existing buildings over greenfield development. • Comments that sustainable tourism, recreation, small-scale farming, growing areas, crafts, outdoor education and rural stewardship should be better addressed. • Requests for stronger integration with biodiversity objectives, habitat connectivity, community stewardship and climate change resilience. • Comments that NPPF paragraph 182 and landscape sensitivity evidence should be fully and correctly applied to sites affecting the High Weald National Landscape.	policy, the statutory duty to seek to further the conservation and enhancement of natural beauty, and relevant local evidence. Site allocations have been assessed through the Local Plan evidence base and will continue to be considered against landscape, biodiversity and sustainability requirements.	

• One comment suggests establishing a dedicated planning authority for the National Landscape area, similar to arrangements for National Parks.		

Policy NE8: Setting of the South Downs National Park

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 49	**Support:** 38	**Neutral:** 6	**Object:** 5

Policy NE8: Setting of the South Downs National Park		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Welcomes the partnership approach with the South Downs National Park Authority. • Advises that Policy NE8.3 should be strengthened so development avoids or fully mitigates impacts, rather than only having no significant adverse impact.	• Comments noted. The policy wording has been reviewed to ensure it is sufficiently robust and consistent with national policy expectations on avoiding and mitigating impacts on the National Park and its setting.	Policy wording has been revised.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council	• Support noted.	No action required.

• Fully supports the policy, subject to the views of the South Downs National Park Authority.		
South Downs National Park Authority • Recommends revising the policy to reflect NPPF paragraph 182 so development in the setting of the National Park is sensitively located and designed to avoid or minimise adverse impacts. • Requests supporting text identifying the characteristics of the National Park setting that need protection. • Welcomes reference to the Management Plan but asks that this is clarified as the Partnership Management Plan.	• Comments noted. The policy and supporting text has beenreviewed for consistency with national policy and to ensure that the local characteristics of the South Downs National Park setting are clearly explained.	Policy and supporting text amended to identify characteristics of the setting and clarify reference to the Partnership Management Plan.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Heathfield and Waldron Parish Council • Supports draft Policy NE8. • Considers that no change is required.	• Support noted.	No action required.
Withyham Parish Council • Supports draft Policy NE8. • Considers that no change is required.	• Support noted.	No action required.
Mayfield and Five Ashes Parish Council • Has no comment as the policy is not relevant to the parish.	• Comment noted.	No action required.
Rotherfield Parish Council • Supports draft Policy NE8.	• Support noted.	No action required.

Laughton Parish Council • Supports draft Policy NE8.	• Support noted.	No action required.
Horam Parish Council • Requests replacing "will have regard to" with "will follow" in Policy NE8.3. • Considers this would strengthen the policy and ensure relevant National Park documents take precedence.	• Comments noted. The wording of Policy NE8.3 has been reviewed so that it is justified while remaining proportionate and legally appropriate.	Amendments to Policy NE8 have been made
Polegate Town Council • Supports draft Policy NE8 but considers it should be strengthened. • Suggests WDC should work more closely with the South Downs National Park Authority. • Raises concern about Mornings Mill Farm, views from the National Park, land protection, traffic through the National Park and impacts on dark skies.	• Comments noted. The policy and supporting text have been reviewed to ensure impacts on views, setting and dark skies are adequately addressed.	Amendments to Policy NE8 have been made
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Grassroots Planning on behalf of South West Strategic Developments • Raises concern that almost any development in the area could be visible from the South Downs, particularly at night. • Considers the wording is too restrictive because it allows for no impacts, where	• Comments noted. The policy has been reviewed to ensure wording is sufficiently protective while proportionate and consistent across the criteria.	Amendments to Policy NE8 have been made

minor impacts may be acceptable with mitigation. • Suggests amending criterion 1 to refer to development not significantly detracting from or causing detriment to the National Park, and criterion 2 to refer to no significant adverse impacts.		
Strutt and Parker on behalf of the Firle Estate • Objects to Policy NE8 and considers the NPPF already provides appropriate protection. • Raises concern that Policy NE8 could compromise delivery of allocations BE1 and BE2 because of the absolute nature of parts of the policy. • Considers parts 2 and 3 are imprecise, too absolute and extend National Park purposes beyond the Park boundary without reasoned justification. • Requests deletion of parts 2 and 3.	• Comments noted. The policy has been reviewed to ensure that it is justified, proportionate, clear and does not unreasonably duplicate national policy.	Amendments to Policy NE8 have been made
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Village Concerns, Dicker Residents Association • Supports draft Policy NE8. • Considers that no change is required.	• Support noted.	No action required.
Transport Futures East Sussex • Supports draft Policy NE8 and agrees with the principles and descriptors.	• Support noted. Wider transport comments are noted and will be considered alongside relevant transport and sustainability policies.	No direct change to Policy NE8 required.

• Considers the aspirations would be aided by reductions in private motorised vehicle numbers and use.		
Friends of the South Downs • Strongly supports Policy NE8 and welcomes reference to views out of the National Park. • Raises concern that development visible from elevated viewpoints on the Downs should consider longer-distance and downward-looking views. • Suggests increased tree planting where housing adjoins the Downs, particularly at Polegate, Wannock and Willingdon. • Suggests paragraph 6.132 should acknowledge the eastern boundary of the Park is formed by the built-up edge of Polegate, Wannock and Willingdon.	• Comments noted. The supporting text has been reviewed to ensure that views from elevated viewpoints, landscape mitigation and the built-up edge of the National Park are appropriately recognised.	Amendments to Policy NE8 and its supporting text have been made.
Clarity Ecoworks • Objects to draft Policy NE8. • Considers the setting of the South Downs National Park can be protected under existing Policy NE6 Landscape Character.	• Comments noted. The relationship between Policy NE8 and Policy NE6 has been reviewed to ensure that the policy is justified and avoids unnecessary duplication.	No further action required.
Folkington Estate • Objects to draft Policy NE8 but supports recognising the relationship between the South Downs and the Low Weald.	• Comments noted. The policy and supporting text should be reviewed to ensure the relationship between the South Downs, Low Weald and Pevensey Levels is appropriately reflected.	No further action is required. Appropriate supportive wording is provided for the Low Weald is provided in the introductory and supporting text.

• Requests that reference to the Low Weald is included in the policy wording itself, not only in supporting text.		

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents grouped summary • Many residents support draft Policy NE8, with a number stating that no change is required. • Several respondents consider the policy should be strengthened, particularly in relation to the South Downs National Park Authority's policies, the Partnership Management Plan, dark skies, views from the National Park and the impact of large developments such as Mornings Mill Farm and Berwick Station. • Concerns were raised that the setting of the National Park, views, tranquillity, tourism assets, rural roads, air pollution and traffic impacts need stronger protection. • Some respondents requested clearer wording, including replacing "will have regard to" with "will follow", setting out the distance of the National Park setting from the boundary, and requiring clearer visual impact assessments. • Other suggested additions included ecological connectivity, climate change adaptation, sustainable recreation, support for local conservation initiatives, and stronger	• Comments noted. The policy and supporting text have been reviewed to ensure it provides clear, proportionate and effective protection for the setting of the South Downs National Park, including views, dark skies, landscape character and relevant mitigation. Matters that are broader than Policy NE8 will be considered alongside other relevant Local Plan policies.	The policy and supporting text has been reviewed in relation to the the setting of the National Park, and references to views, dark skies, visual impact assessment and mitigation considered.

integration with local and regional planning efforts. • A small number of respondents questioned enforceability or whether the policy is strong enough in light of recent development approvals.		

Policy NE9: Agricultural Land

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 116	**Support:** 78	**Neutral:** 13	**Object:** 25

Policy NE9: Agricultural Land		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Supports the policy but recommends stronger wording to prioritise avoiding loss of best and most versatile agricultural land, prefer poorer quality land, recognise irreversible impacts, and require soil handling and sustainable soil management strategies for development on BMV land.	• Comments noted. The policy and supporting text recognise the need to protect BMV agricultural land and consider the value of land for food production, ecosystem services and natural capital.	No direct change required.

Neighbouring/Other Local Authorities	WDC Response	Changes made to policy/chapter
East Sussex County Council • Supports draft Policy NE9 Agricultural Land.	• Support noted.	No change required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Rotherfield Parish Council • Supports the policy but seeks stronger wording so applications affecting BMV land would normally be declined, and asks for "natural capital" to be explained for lay readers.	• Comments noted. The policy seeks to protect BMV agricultural land while recognising other policy considerations. Further explanation of specific terminology is considered unnecessary.	No direct change required.
Laughton Parish Council • Objects. Considers the policy should apply beyond BMV land to other high-quality agricultural land, including organic pasture, and should account for fragmentation, ecosystem services and natural capital.	• Comments noted. The policy already requires applicants to consider agricultural value beyond ALC grade, including food production, ecosystem services and natural capital.	No direct change required.
Heathfield and Waldron Parish Council • Supports the policy but would prefer development of BMV agricultural land to be prevented altogether. Suggests revised wording to refer to actual and potential contribution to food production, ecosystem services and natural capital.	• Comments noted. A blanket prohibition is not considered appropriate	No direct change required.

Mayfield and Five Ashes Parish Council • Requests change to the monitoring framework.	• Noted. The monitoring framework has been reviewed.	The monitoring framework has been reviewed.
Polegate Town Council • Suggests consideration should be given to whether agricultural land could be improved rather than relying on current grading, and that food security and local food production should be considered.	• Comments noted. The policy recognises agricultural land value and wider sustainability considerations.	No change required.
Uckfield Town Council • Objects to reliance on ALC grading and argues that pasture/grazing land can be highly valuable for meat production, habitats, flora, ancient/veteran trees and hedgerows.	• Comments noted. The policy does not rely solely on ALC grade and requires consideration of food production, ecosystem services and natural capital.	No change required.
Frant Parish Council • Supports the policy but considers the baseline should be protection of all agricultural land, not only BMV land.	• Comments noted. The policy focuses on BMV land in line with national policy but also recognises wider agricultural value.	No change required.
Horam Parish Council • Objects. Seeks prevention of development on BMV agricultural land and asks that supporting information on loss of agricultural land, wider farming resource, natural capital and ecosystem services is submitted with applications.	• Comments noted. Submission requirements can be addressed through validation and application-stage evidence where relevant.	No change required

Withyham Parish Council • Supports the policy but suggests refusal should be considered where BMV agricultural land would be lost.	• Comments noted. The policy seeks to protect BMV land but must be applied alongside other planning considerations.	No change required.
Isfield Parish Council Generally supports the policy but considers the starting point should be all agricultural land rather than only BMV land.	• Comments noted. The policy reflects national policy emphasis on BMV land while recognising wider land value.	No change required.
Chalvington with Ripe Parish Council • Supports the policy and agrees with protecting farmland, noting likely BMV land within the parish.	• Support noted.	No change required.
Willingdon and Jevington Parish Council • Considers good and medium agricultural land should be retained for food production and that farming should be better supported.	• Comments noted. The policy recognises the importance of agricultural land and food production.	No change required.
Maresfield Parish Council • Supports the policy but considers all agricultural land should be protected as a baseline, including land with value beyond food production.	• Comments noted. The policy provides protection for BMV land and recognises wider agricultural value.	No change required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**

The Working Group Against Over Development, CPRE Sussex • Objects and suggests Policy NE9 should make clear that, because Wealden has very little BMV land, Grade 3b land is important and should be referenced.	• Comments noted. The policy recognises that quality may be determined by more than ALC grade.	No change required.
Village Concerns • Supports the policy but considers paragraph 6.139 misleading because only a small proportion of Wealden's agricultural land has been surveyed. Requests ALC surveys for planning applications on agricultural land.	• Comments noted. Application-stage evidence may be required where relevant. This is set out in the policy.	No direct change required.
Conservators of Ashdown Forest • Raises concern that directing development to poorer agricultural land may prioritise agricultural production over biodiversity and connectivity values.	• Comments noted. The policy should be read alongside other natural environment policies and recognises ecosystem services and natural capital.	No direct change required.
Transport Futures East Sussex • Supports the policy and considers it detailed and largely uncontroversial, but notes that wider objectives would be aided by reducing private motorised vehicle use.	Support noted. Transport matters are addressed elsewhere in the Local Plan.	No change required.

Willingdon Residents Association • Considers good and medium agricultural land should be retained for food production and that farmers should be supported rather than encouraged to develop land.	• Comments noted. The policy recognises the importance of retaining higher quality agricultural land.	No change required.
High Weald National Landscape • Supports the policy and requests additional supporting text recognising the importance of Grade 3b land to the High Weald's pastoral agriculture economy and landscape character.	• Comments noted. The importance of land quality beyond ALC grade is acknowledged.	No specific High Weald-only wording required; wider supporting text addresses this issue.
Dicker Residents Association • Supports the policy and requests no change.	• Support noted.	No change required.
Tor and Co on behalf of Hertfordshire Holdings • Questions whether the policy is necessary given NPPF paragraphs 180 and 181 and footnote 62 and suggests specific applicant requirements should be in the validation checklist.	• Comments noted. The policy provides local application of national policy and clarification for decision-making.	No change required.
Uckfield Community Technology College • Objects and seeks protection for Grade 3b organic soil, hay meadows, DEFRA stewardship land, organic investments, tenant farmers, local food infrastructure, farmers markets and abattoirs.	• Comments noted. Some matters extend beyond the scope of Policy NE9 but are relevant to wider rural economy, biodiversity and land management considerations.	No specific policy change required.

Nevill Estate Company, Beal's Farm Charcuterie • Supports the policy but suggests it could be expanded to support creative and innovative ideas that bring long-term viability to the rural economy.	• Comments noted. Rural economy matters are addressed through other Local Plan policies.	No change required.
Grassroots Planning on behalf of South West Strategic Developments • Requests greater flexibility so protection of BMV land applies unless loss is unavoidable to achieve wider sustainability objectives.	• Comments noted. The policy already allows for consideration of wider sustainability objectives.	No change required.
Taylor Wimpey • Objects that Policy NE9 is inconsistent with national policy by applying to all development rather than significant development and should not apply to allocated sites.	• Comments noted. The policy has been considered for consistency with national policy and the delivery of allocated sites. • The intention of Policy NE9 is to ensure that all development proposals contribute, where proportionate and appropriate to their scale and nature, towards biodiversity enhancement and the delivery of the Council's wider environmental objectives. The policy is not intended to impose disproportionate requirements on minor forms of development. • The Plan is read as a whole. Site allocations identify land as suitable in principle for development but do not remove the need for development proposals to comply with the wider development plan. Applying Policy NE9 will be	Policy has been reviewed and streamlined where relevant, but no changes are required as a direct result of the comments made in this representation.

	applacied consistently across allocated and non-allocated sites helps ensure that biodiversity impacts are appropriately assessed and mitigated, and that opportunities for biodiversity enhancement are secured as part of the delivery of planned growth.	
Wealden Food Partnership • Supports the policy in principle but considers is flawed because most Wealden land is Grade 3b or below. Seeks updated evidence and additional local classifications for organic pasture, species, hedgerows, regenerative farming and biodynamic farming.	• Comments noted. The policy recognises that land quality may be determined by more than ALC grade.	No direct change required.
Clarity Ecoworks • Supports the policy and requests no change.	• Support noted.	No change required.

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents • Many residents support Policy NE9 and/or agree that agricultural land should be protected. • A number of residents raise concerns that the policy places too much reliance on ALC grading and does not sufficiently recognise the value of	• Comments noted. Policy NE9 seeks to protect best and most versatile agricultural land and recognises that agricultural land quality may be determined by more than ALC grade, including contribution to food production, wider ecosystem services and natural capital. The Local Plan should be read as a whole	A number of amendments have been made to the policy in line with comments made.

Grade 3b land, pasture, grazing land, organic land, hay meadows, horticultural land and land with local food production value. • Several respondents consider that all agricultural land should be protected as a starting point, not only BMV land, with some calling for no development on agricultural land or for development to be a last resort. • Residents emphasise food security, local food production, support for farmers, sustainable and regenerative farming, farmers markets, farm shops, abattoirs and the rural economy. • A number of comments highlight wider ecosystem services and natural capital, including biodiversity, wildlife corridors, flood risk mitigation, carbon storage, cooling/shading, buffer zones, natural boundaries and climate change adaptation. • Some respondents request stronger protection for certified organic land and land with candidate organic status. • Several respondents refer to Hook and Sons/Longleys Farm and Site HA2, arguing that organic grazing land should not be allocated for housing because of its role in local food production, employment, biodiversity and the rural economy. • Some residents seek recognition of farmland west of Upper Dicker for its landscape, biodiversity and potential environmental protection value.	alongside other policies relating to biodiversity, landscape, climate change, rural economy, flood risk and site allocations. Site-specific comments relating to HA2/Longleys Farm are addressed under the relevant site allocation response.	

• A small number of residents consider the policy should support creative rural economy ideas and long-term agricultural viability.		

Policy NE10: Light Pollution and Dark Skies

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 73	**Support:** 58	**Neutral:** 4	**Object:** 11

Policy NE10 – Light Pollution and Dark Skies		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Welcomed the policy but suggested it should be strengthened to robustly consider all receptors to light pollution, including natural habitats, woodland, bat roosts, flightlines and feeding areas. Recommended lighting be directed away from these features in line with BCT guidance and that impacts on dark night skies within the South Downs National	Comments noted. Supporting text/policy wording ensure biodiversity receptors and sensitive habitats are clearly addressed and that impacts on designated landscapes and their settings are appropriately avoided or mitigated.	Amended policy and supporting text.

Park setting and High Weald National Landscape should be avoided rather than only had regard to.		
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Supported Policy NE10.	• Comment of support noted.	No further action required.
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Uckfield Town Council • Objected but supported a dark skies policy to protect nocturnal wildlife, ecosystems, flora and fauna, and human biology/sleep. Suggested paragraph 6.152 should go further to protect woodland habitats, with no light overspill into sensitive areas and no disturbance to bat roosts or foraging/commuting routes. Also noted the policy seems robust in requiring visual impact and mitigation to be considered at the outset.	• Comments noted. The policy and supporting text addresses sensitive habitats, biodiversity receptors and the role of lighting mitigation at application stage.	Amendments to supporting text have been made.
Laughton Parish Council • Supported Policy NE10.	• Comment noted.	No further action required.
Heathfield and Waldron Parish Council • Objected and suggested Part 1 should require proposals to comply with relevant lighting guidance and eliminate negative impacts. Suggested stronger	• Comments noted. The policy has been reviewed and restructured to respond to this issue.	Amended policy wording has been made to part 2 of the policy.

wording similar to Policy NE11, covenants to restrict uncontrolled external lighting after first sale, and additional wording on nature conservation and biodiversity.		
Polegate Town Council • Supported Policy NE10 and suggested the effects of traffic travelling to and from development on dark skies should be considered.	• Comment noted.	No further action required.
Mayfield and Five Ashes Parish Council • Noted that a consortium of Wealden parishes is seeking International Dark Sky certification. Recommended adding a policy requirement for developments to adhere to parish policies needed to achieve certification and adding a monitoring indicator for the number of certified parishes.	• Comment noted. The aspiration for Dark Sky certification is noted, although policy requirements should remain proportionate and deliverable through the planning system.	No further action required.
Horam Parish Council • Objected and suggested Policy NE10 should include the setting of the High Weald National Landscape. Also sought more detailed lighting design and technology standards, integration with environmental conservation, public education, support for dark sky reserves/parks, guidance on cumulative impacts, and wording on nature conservation and biodiversity.	• Comments noted. The supporting tex has been updated to clarify its application to the High Weald National Landscape and its setting and address biodiversity and detailed lighting design considerations.	Amendments have been made to supporting text in line with changes identified above. This draws out the importance of the High Weald National Landscape.

Withyham Parish Council • Supported Policy NE10 and stated no change was required.	• Comment of support noted.	No further action required.
Isfield Parish Council • Supported Policy NE10 and suggested the application of the policy should be clearer, with planning conditions applied to ensure lighting is suitably designed and controlled in perpetuity.	• Comment of support noted. The extra detail is not considered to be required.	No further action required.
Rotherfield Parish Council • Supported Policy NE10 but suggested paragraph 6.144 should explain that "valuable benefits to society" includes public safety.	• Comment noted.	No further action required.
Frant Parish Council and Maresfield Parish Council • Supported Policy NE10 but recommended it be made more robust, including explicit application to residential development of all scales, extensions and conversions. Suggested references to timer switches, turning lights off overnight, and conditions to secure lighting regimes in perpetuity.	• Comments noted. This level of detail is not considered appropriate for the policy.	No further action required.
Willingdon and Jevington Parish Council • Suggested that all new developments should consider Policy NE10.	• Comment of support noted.	No further action required.

Chalvington with Ripe Parish Council • Supported Policy NE10 in relation to dark skies, noting that Chalvington and Ripe has no streetlights. Suggested the policy should give significant weight to the need for natural light within properties where suitable measures are in place to minimise light escape at night and reflectivity during daylight.	• Comment of support noted. The need to balance daylight, design quality and dark skies is noted.	No further action required
Site Promoters/ Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Dicker Residents Association • Objected and suggested more emphasis is needed on the conflict between development and light pollution, which should be factored into planning applications.	• Comment noted. Policy NE10 will provide a basis for assessing light pollution impacts as part of relevant planning applications.	No further action required.
The Working Group Against Over Development and CPRE Sussex • Objected and suggested that all external lighting, including street lighting, should be fitted with movement detectors with a maximum on-time of three minutes. Also suggested street lighting should be switched off between 23:00 and 06:00 where possible to save energy and minimise light pollution.	• Comments noted. Detailed lighting controls may be secured where appropriate through design, conditions and relevant lighting standards. It is not required for the policy wording.	No further action required.
Hertfordshire Holdings Tor & Co • Suggested the Council should clarify with the highway authority the minimum acceptable	• Comments noted. The policy should be applied proportionately alongside	No policy change proposed; consider implementation through validation guidance where appropriate.

standards for street lighting before implementing the policy, and that requirements for outdoor lighting should be clearly set out in the local validation checklist. Also sought a proportionate approach that recognises the need for safe functioning of neighbourhoods and developments.	highway safety and other relevant technical requirements.	
Village Concerns • Supported Policy NE10 and noted that many rural village residents value dark skies and oppose street lighting and illuminated housing estates. Suggested developers should establish community preferences before applying urban planning norms, and that Policy NE10 should be linked with Policy DE3 to avoid conflict in rural villages and areas.	• Comments noted. The policy seeks to reduce adverse light pollution impacts and should be read alongside wider design policies.	No further action required.
Conservators of Ashdown Forest • Suggested reference should be made to the special consideration of SPA, SAC and Ramsar sites and their 400m and 7km zones in relation to light pollution.	• Comments noted. The sensitivity of internationally designated sites and associated zones is recognised within the supporting text	Supporting text has been revised to provide more detail on this, in line with comments made above.
Willingdon Residents' Association • Suggested that all new developments should consider Policy NE10.	• Comment noted.	No further action required.
Transport Futures East Sussex	• Comment of support noted.	No further action required.

• Supported Policy NE10, stating that the principles and descriptors are detailed and generally uncontroversial. Suggested the policy's aspirations would be aided by reductions in the number and ubiquity of private motorised vehicles.		
Friends of the South Downs • Supported Policy NE10, particularly the reference to respecting the South Downs Dark Skies Reserve.	• Comment of support noted.	No further action required.
Uckfield Chamber of Commerce • Supported Policy NE10.	• Comment of support noted.	No further action required.
High Weald National Landscape • Supported Policy NE10, noting that dark skies are a key character component of the High Weald Management Plan and welcoming the emphasis on avoiding negative effects of light pollution on wildlife, heritage assets and landscape character.	• Comment of support noted.	No further action required.
Pevensey and Cuckmere Water Level Management Board • Supported Policy NE10 but suggested bullet point 8a should seek water quality improvement measures, such as wetlands downstream of onsite sewage treatment plants before discharge to a watercourse.	• Comment of support noted. The detailed point relates primarily to water quality and is more relevant to other policies.	No change proposed to Policy NE10.

Clarity Ecoworks • Objected to Policy NE10 and suggested Pevensey Levels and Pevensey Levels SAC should be added to areas requiring special concern due to light pollution and wildlife disturbance.	• Comments noted. The role of sensitive ecological receptors, including internationally designated sites, are set out in the supporting text where relevant.	• Supporting text has been revised to provide more detail on this.
Sussex Wildlife Trust • Supported the inclusion of Policy NE10, particularly the requirements set out in part 2.	Comment of support noted.	No further action required.

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents • Overall support for Policy NE10, with several comments requesting clearer application, enforcement and use of planning conditions to control lighting in perpetuity. • Suggested the policy should apply to all residential development, including extensions, refurbishments, roof lights and small-scale development. • Raised concerns about light pollution impacts on biodiversity, including bats, woodland, insects such as glow-worms and fireflies, and sensitive rural areas. • Suggested stronger wording so development complies with relevant guidance and avoids	• Comments noted. The policy seeks to manage artificial lighting to protect dark skies, biodiversity, landscape character, residential amenity and public safety. The importance of clear implementation, appropriate conditions and proportionate design solutions is recognised.	Policy wording and supporting text updated.

any unacceptable light spill, rather than relying on subjective mitigation wording. • Raised concern about street lighting, security lighting, shop lighting, glazed areas and large bi-fold doors contributing to light pollution. • Suggested rural villages with currently dark skies should be given greater emphasis alongside the High Weald National Landscape and South Downs National Park. • Some comments considered light pollution should not automatically prevent development and that the Council should work with developers to design schemes that avoid or minimise light pollution. • Suggested lighting design measures including warm white light below 3,000K, bollard lighting directed away from woodland, low-level wayfinding lighting and lighting designed for safety. • Raised concerns about fires and smoke around settlements affecting dark skies, and about controls where extensions are permitted development.		

Policy NE11: Noise Pollution

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 63	**Support:** 48	**Neutral:** 4	**Object:** 11

Policy NE11 – Noise Pollution		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Wildlife receptors are also very sensitive to noise and should be captured in the draft Policy.	• Comments noted. Wildlife receptors are important to the policy. Restructuring and review of part 1 of the policy reflects this.	New criterion 1 of the policy
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
No comments.	n/a	n/a
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council • No comment as the policy is unlikely to be relevant to the parish.	Noted.	No action required.
Rotherfield District Council • Supported the draft Policy. • Suggested paragraph 6.155 should recognise that agricultural machinery can generate noise.	• Comment of support noted. The suggested change is not considered to be required.	No action required.

Withyham Parish Council • Supported the draft Policy and confirmed no change required.	• Comment of support noted.	No action required.
Laughton Parish Council • Supported the draft Policy and confirmed no change required.	• Comment of support noted.	No action required.
Horam Parish Council • Objected to the draft Policy. • Sought clearer noise mitigation measures and design standards, including soundproofing, buffer zones and landscaping. • Suggested a holistic approach to soundscape quality and quiet areas. • Requested greater emphasis on constant/intermittent noise impacts on the natural environment. • Suggested additional wording on construction traffic, lorries and construction noise.	• Comments noted.	No further changes are deemed required.
Polegate Town Council • Supported the draft Policy. • Requested consideration of construction noise, timing and construction vehicles.	• Comment of support noted. No further detail is required necessary to be added.	No action required.
Isfield Parish Council • Supported the draft Policy in principle. • Suggested reference to indirect noise emissions, including traffic noise arising from major retail development.	• Comments noted. No further detail is required necessary to be added	No action required.

Heathfield and Waldron Parish Council • Supported the draft Policy. • Requested greater emphasis on effects of constant or intermittent noise on the National Landscape, protected species and native wildlife. • Suggested wording in NE11 2(d) should define "unacceptable".	• Comment of support noted. The Council will reflect amendments to clarify unacceptable noise and strengthen references to natural environment receptors in supporting text. The revised policy wording is considered strong enough in this regard.	General amendments to the policy and the supporting text have ensured this comment is addressed.
Frant Parish Council • Supported the draft Policy. • Suggested part 1 does not sufficiently recognise cumulative impacts from different noise sources.	Comment of support noted. Cumulative impacts will be considered in line with the policy wording and supporting text.	No further action required.
Maresfield Parish Council • Supported the draft Policy. • Suggested part 1 does not sufficiently recognise cumulative impacts from different noise sources.	• Comment of support noted. It is considered that cumulative impacts are adequately covered by the policy wording and supporting text.	No further action required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Hertfordshire Holdings (Tor & Co) • Suggested that specific noise submission requirements should be set out clearly in the local validation checklist, subject to further consultation.	• Comments noted. Validation checklits requirements sit outside of the Local Plan.	No policy change required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**

The Working Group Against Over Development • Objected to the draft Policy. • Suggested housing in noisy areas should not rely on closed windows to achieve Lowest Observed Adverse Effect levels. • Suggested noise barriers should be non-intrusive and blend into the landscape.	• Comments noted. No further changes to the policy are required necessary other than those made through the general review of the policy and in response to other representations highlighted above.	No further action required.
CPRE Sussex • Objected to the draft Policy. • Suggested housing in noisy areas should not rely on closed windows to achieve Lowest Observed Adverse Effect levels. • Suggested noise barriers should be non-intrusive and blend into the landscape.	• Comments noted. No further changes to the policy are required necessary other than those made through the general review of the policy and in response to other representations highlighted above.	No further action required.
Clarity Ecoworks • Supported the draft Policy and considered no change required.	• Comment of support noted.	No action required.
Dicker Residents Association • Supported the draft Policy and considered no change required.	• Comment of support noted.	No action required.
BP • Supported the draft Policy and considered no change required.	• Comment of support noted.	No action required.
Village Concerns • Supported the draft Policy and considered no change required.	• Comment of support noted.	No action required.

Conservators of Ashdown Forest • Suggested reference should be made to special consideration of SPA, SAC and Ramsar sites and their 400m and 7km zones. • Suggested reference should also be made to Ashdown Forest as a quiet and natural area under the Ashdown Forest Act 1974.	• Comments noted. It is not considered that specific reference needs to be made in this policy to the Ashdown Forest.	No further action required.
Transport Futures East Sussex • Supported the draft Policy. • Considered the principles and descriptors detailed and generally uncontroversial. • Suggested policy aspirations would be aided by reducing private motorised vehicle use.	• Comment of support noted.	No direct policy change required.
The Marquess of Christopher Abergavenny • Objected to the draft Policy. • Suggested it does not go far enough to address Gatwick Airport noise affecting sensitive natural receptors including Ashdown Forest, the High Weald National Landscape and SSSIs.	• Comments noted. No further changes to the policy are required necessary other than those made through the general review of the policy and in response to other representations highlighted above.	No further action required.
Beal's Farm Charcuterie • Objected to the draft Policy. • Suggested it does not go far enough to address Gatwick Airport noise affecting sensitive natural receptors including Ashdown Forest, the High Weald National Landscape and SSSIs.	• Comments noted. No further changes to the policy are required necessary other than those made through the general review of the policy and in response to other representations highlighted above.	No further action required.

Local Residents	WDC Response	Changes made to policy/chapter
• Support was expressed for draft Policy NE11. • Concerns were raised that applicant-led noise assessments may not be sufficiently investigated through planning applications. • Greater analysis was requested of cumulative traffic congestion and noise from permitted but unbuilt developments. • Objections raised that the policy should include clearer noise mitigation measures and design standards, including soundproofing, buffer zones and strategic landscaping. • Residents suggested clearer standards to assist developers and secure consistent application across the district. • The policy was considered not to fully address cumulative noise impacts from multiple sources, including strategic developments during construction and occupation. • Suggestions included identifying, mapping and protecting quiet areas/natural soundscapes, public noise reporting, community consultation and public education. • Greater emphasis was requested on road and traffic noise, including delivery traffic, loud vehicles, unsuitable road infrastructure and traffic calming measures. • Concerns were raised that indirect noise emissions are harmful to amenity and tranquillity in a predominantly rural district.	• Comments noted. The policy seeks to manage adverse noise impacts through the planning process. Further consideration has been given to whether the supporting text addresses address cumulative, indirect, construction, traffic and rural noise issues, and expectations for mitigation where appropriate. General revisions to the policy and responses directly to the representations highlighted above are considered sufficient.	Policy wording and supporitng text have been updated generally.

• Concerns were raised that the policy could affect the rural economy where agricultural machinery creates noise. • Support was expressed for locating development sustainably to minimise noise from road traffic and vehicles. • Residents suggested comprehensive and enforceable CEMPs for developments, including noise pollution measures. • Concerns were raised about Air Source Heat Pump noise impacts on adjoining occupiers and quality of life. • Careful consideration was requested of NC and NR ratings, and more noise measuring equipment was suggested.		

Policy NE12: Air Pollution

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 58	**Support:** 40	**Neutral:** 6	**Object:** 12

Policy NE12 – Air Pollution		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Advised that the phrase "do not result in significant adverse impacts on sensitive receptors" is not sufficiently robust. • Suggested policy wording should be revised to require development to "avoid or fully mitigate" adverse impacts on sensitive receptors.	Comments noted. The wording of the policy has been been reviewed to ensure it is sufficiently robust in relation to sensitive receptors.	The policy has been restructured and reviewed.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
No comments.	n/a	n/a
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council • No comment as the policy is unlikely to be relevant to the parish.	Noted.	No action required.
Laughton Parish Council	• Comment of support noted.	No action required.

Supported draft Policy NE12.		
Withyham Parish Council Supported draft Policy NE12.	• Comment of support noted.	No action required.
Rotherfield Parish Council • Supported draft Policy NE12. • Suggested examples of acceptable mitigation measures should be included in point 5 of the policy.	• Comment of support noted. Details of mitigation measures are not necessary for the policy.	No further action required.
Heathfield and Waldron Parish Council • Supported draft Policy NE12. • Suggested "significant" measured values must be carefully set in the Wealden context, including the National Landscape and historic environment. • Emphasised the need to consider cumulative impacts of successive proposals.	• Comment of support noted. The policy will ensure cumulative impacts are considered where relevant.	No further action required.
Horam Parish Council • Objected to draft Policy NE12. • Suggested major development should be defined as 10 or more dwellings for bullet point 3a. • Requested measurable targets and timelines for reducing key pollutants. • Suggested stronger emphasis on sustainable transport, electric vehicles, public transport, walking and cycling.	• Comments noted. The suggested additions have considered as part of general revisions and restructuring of the policy. References to major development have been removed.	General revisions to the policy cover a number of these matters.

• Suggested guidance on indoor air quality and stronger links between air quality and climate change mitigation.		
Polegate Town Council • Supported draft Policy NE12. • Suggested air quality needs to be consistently monitored, especially where there was no previous development.	• Comment of support noted.	No action required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Hertfordshire Holdings (Tor & Co) • Suggested that any specific air quality requirements for applicants should be clearly set out in the local validation checklist, subject to further consultation.	Comment noted. Validation checklist requirements sit outside the policy wording but can be considered separately through the appropriate process.	No direct policy change required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Dicker Residents' Association • Supported draft Policy NE12. • Suggested more widespread air pollution monitoring, especially near schools, should inform decisions on development and increased car use.	• Comment of support noted. Monitoring comments are noted.	No direct policy change required
Conservators of Ashdown Forest • Suggested reference should be made to Ashdown Forest's lowland heathland habitat	• Comment of support noted. The relevance of Ashdown Forest and nitrogen deposition is reflected in	No further action required.

and SAC status, particularly in relation to nitrogen deposition impacts.	other policies in the Plan, specifically the Ashdown Forest Policy.	
Village Concerns • Supported draft Policy NE12 and indicated no change was required.	• Comment of support noted.	No action required.
Transport Future East Sussex • Supported draft Policy NE12 and indicated no change was required.	• Noted.	No action required.
BP • Supported draft Policy NE12 and indicated no change was required.	• Comment of support noted.	No action required.
Willingdon Residents' Association • Suggested air pollution should be monitored carefully in the Willingdon area due to proposed housing growth, existing pollution and pollution from France.	• Comment noted.	No direct policy change required; monitoring comments noted.
The Marquess of Christopher Abergavenny and Beal's Farm Charcuterie • Objected that the policy does not go far enough to address Gatwick Airport as a local noise and pollution source, including aircraft impacts on Ashdown Forest, the High Weald National Landscape and SSSIs.	• Comment noted. The scope of the air pollution policy and its relationship with wider aviation-related impacts have been considered but not considered necessary to amend the policy or supporting text.	No further action required.

Clarity Ecoworks • Objected to draft Policy NE12. • Suggested threshold limits for Pevensey Levels should be reassessed for actual habitat character of protected species. • Suggested special regard should be given to prevailing winds across sites, especially close to Special Areas of Conservation.	• Comments noted. The relationship between air quality impacts, protected habitats should be considered where relevant through site assessment and policy implementation.	No further action required to this policy or supporting text.

Local Residents	WDC Response	Changes made to policy/chapter
• Support was expressed for draft Policy NE12. • Some residents supported alternatives such as wood burners and coppiced wood to reduce carbon footprint, while others raised concerns about wood burning stoves and air quality, particularly in Hailsham. • Residents suggested Ashdown Forest SPA/SAC protection, aircraft impacts on air quality, and prevailing wind impacts from the Newhaven incinerator should be considered. • Concerns were raised that housing growth and reliance on private cars, due to poor public transport, could increase air pollution. • Questions were raised about why ozone was not included and whether there are enough air quality monitoring sites to enforce the policy. • Residents suggested development should improve air quality, with stronger wording than “should”.	• Comments of support and objection noted. The issues raised cover monitoring, enforcement, sensitive habitats, transport-related emissions, domestic heating, ozone, and the strength of policy wording. These matters will be considered where they fall within the scope of the Local Plan and air pollution policy, and have been dealt with by general amendments and restructuring to streamline the policy	No further action required to this policy or supporting text.

• Suggestions included 20mph zones, low-pollution travel by walking, cycling and horses, reducing VOCs and methane, requiring air quality assessment for all housing development, incentivising air source heat pumps, and clarifying enforcement. • Concerns were raised that the Climate Change graphic following paragraph 2.32 is factually incorrect in relation to ground-level ozone and relevant UK/EU thresholds.		

Policy NE13: Water Environment and Water Infrastructure

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 102	**Support:** 46	**Neutral:** 6	**Object:** 50

Policy NE13: Water Environment and Water Infrastructure		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Neutral. Requests stronger wording to ensure impacts are avoided or fully mitigated, removal of "where possible" in NE13.3,	• Comments noted. The policy wording has been reviewed to ensure it provides robust protection for groundwater, aquifers, habitats and species, while remaining clear	The policy has been restructured and streamlined to take account of all representations received. The term 'where possible' has been removed.

stronger restrictions on potentially polluting development, clarification on sewage treatment wording, and greater emphasis on infrastructure being available over the plan period.	and effective for development management purposes.	
Southern Water • Supportive, but requests amendments to clarify the respective roles of developers and statutory undertakers. Southern Water considers that applicants should not be required to set out infrastructure improvements that are the statutory undertaker's responsibility, and that the latest statutory undertaker information should instead be incorporated.	• Comments noted. The wording of the policy and supporting text helps to distinguish between matters that can reasonably be addressed by applicants and those which sit with the statutory undertaker through separate statutory regimes. Part 7 of the policy has been specifically amended.	Policy NE13 part 7 has been amended.
South East Water Ltd • Supportive. Requests stronger protection for Source Protection Zones, references to the Water Resources Management Plan 2024 once approved, and consideration of floodplain loss and wider water quality impacts beyond the Water Framework Directive.	• Comments noted. The supporting text has been reviewed to ensure it recognises Source Protection Zones, and other water resource planning issues.	Supoprting text reviewed.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
No responses received.	n/a	n/a
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**

Rotherfield Parish Council • Supportive. Raises serious reservations about national wastewater management and harmful discharges and notes the need for infrastructure spending. Considers the policy likely goes as far as can be accepted at Regulation 19 stage.	• Comments noted. The concerns reinforce the importance of robust water infrastructure and wastewater policy wording which the Council is seeking to achieve.	No further action required beyond wider review of NE13 wording.
Mayfield and Five Ashes Parish Council • Neutral. Highlights poor water supply provision locally, the need for water supply and wastewater improvements to keep pace with growth, and requests more specific monitoring targets.	• Comments noted. The Council will continue to engage with water providers and has considered monitoring targets.	Monitoring indicators reviewed.
Polegate Town Council • Supportive. Identifies older and undersized pipes, storm flow pressures, sewer overflows and the need to prove adequate system capacity before occupation.	• Comments noted. Many of the issues stated sit with the statutory water undertakers to manage.	General modifications have been made to the policy and supporting text.
Horam Parish Council • Objects. Seeks stronger wording on sustainable water use, water-efficient appliances, rainwater harvesting, climate adaptation, SuDS, natural flood management, ecosystem-based water	• Comments noted. A number of suggested measures overlap with wider policy objectives and have been considered generally through revised and restructured policy wording, as well as the supporting text	The policy and supporting text have been reviewed based on other representations, including from statutory stakeholders. The wording of the policy and supporting text is considered appropriate and to the necessary detail required.

management, separation of foul and surface water, Grampian conditions, public engagement and partnership working.		
Withyham Parish Council • Supportive. Raises concerns about existing capacity constraints, the need for mitigation to avoid restricted supplies, and increased engagement with South East Water and Southern Water.	• Comments noted. Ongoing engagement with statutory undertakers informs plan preparation and infrastructure planning.	Significant engagement has taken place with the water companies through infrastructure work to support the Local Plan. No further changes required to the policy.
Heathfield & Waldron Parish Council • Supportive. Suggests NE13.3 should apply to all watercourses, not just rivers, and should not be limited to development adjacent to watercourses.	• Comments noted. The wording of NE13 has been reviewed for clarity and scope.	Part 4 of the policy has been reviewed.
Isfield Parish Council • Supportive. Requests clarification that cumulative effects of current applications, existing commitments and previous permissions will be considered.	• Comments noted. Consideration of cumulative impacts is relevant to effective water infrastructure and environmental protection and is an overall consideration or the policy.	No further changes required to the policy.
Laughton Parish Council • Supportive. Requests clearer wording for development adjacent to watercourses and tighter drafting of NE13.7 so that	• Comments noted. The wording of the policy has been reviewed for clarity, responsibility and deliverability.	Part 4 and 7 of the policy has been reviewed as above to cover the issues that have been raised here

infrastructure improvements are approved by both the statutory undertaker and WDC.		
Uckfield Town Council • Supportive. Raises water quality, water table disturbance, public sewer connections, issues with package treatment works, pollution capture, river ecological condition, Shortbridge Stream and protection of floodplains and low-lying areas.	• Comments noted. The policy and supporting text will continue to support protection and enhancement of water quality and appropriate wastewater connections.	No further changes required to the policy.
Chalvington With Ripe Parish Council • Supportive. Agrees with the draft policy.	• Support noted.	No action required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
Grosvenor Property UK Limited • Supportive. No detailed comments provided.	• Support noted.	No action required.
Taylor Wimpey UK Ltd • Objects. Considers NE13.1 unclear because "ecology of surface water" is undefined, argues NE13.3 goes beyond national policy, and states NE13.7 is not justified because water infrastructure capacity is the responsibility of statutory providers rather than applicants.	• Comments noted. The policy has been reviewed to ensure requirements are clear, justified, and do not duplicate statutory undertaker responsibilities.	The policy has been streamlined and restructured but the emphasis of the policy text remains.
Trafalgar Group Limited	• Comments noted. The policy will clarify the role of applicants and statutory	Part 7 of the Policy has been amended.

• Objects. Considers NE13 unsound because it requires applicants to identify how wider infrastructure improvements will be completed before development is implemented, despite such infrastructure normally being the responsibility of statutory undertakers.	undertakers in infrastructure delivery. Part 7 of the policy has been amended.	
Gladman Developments Limited • Neutral. States that requiring applicants to outline infrastructure improvements where existing water supply is inadequate is inappropriate because water companies have the statutory duty to provide and maintain adequate infrastructure.	• Comments noted. The policy will avoid placing responsibility on applicants for matters controlled by water companies.	Part 7 of the Policy has been amended.
Persimmon Homes South East • Objects. Considers NE13.7 inappropriate because it requires applicants to assess water and wastewater capacity, which is governed by statutory duties under the Water Industry Act 1991 and should be addressed by water companies and relevant authorities.	• Comments noted. The Council will ensure the policy aligns with the statutory framework for water and wastewater infrastructure.	Part 7 of the Policy has been amended.
Home Builders Federation • Objects. Considers NE13.7 unsound, unnecessary and potentially unlawful because applicants cannot be required to	• Comments noted. The policy has been reviewed to ensure consistency with the legal framework and to avoid requiring	Part 7 of the Policy has been amended.

provide water or wastewater services. States that responsibility lies with water companies and that unresolved water service constraints could affect plan soundness.	applicants to undertake matters outside their control.	
Sigma Strategic Land • Neutral. States that NE13.7 is unnecessary and unlawful because responsibility for water services and infrastructure lies with water companies, working with local authorities and the Environment Agency, rather than applicants or developers.	• Comments noted. The policy wording has been considered against the statutory responsibilities of water companies.	Part 7 of the Policy has been amended.
Rookwood Trinity Limited • Objects. States that water companies have statutory duties to provide water and drainage for new development, and that such facilities are outside the control of development companies.	• Comments noted. This issue is addressed through the wider review of Part 7 of the policy and statutory undertaker responsibilities.	Part 7 of the Policy has been amended.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Dicker Residents Association • Supportive. Calls for the renationalisation of Southern Water and South East Water due to concerns about their environmental impacts.	• Comments noted. Ownership of water companies is outside the scope of the Local Plan, but concerns about environmental impacts and infrastructure performance are noted.	No direct policy change proposed.

Hertfordshire Holdings • Neutral. Considers the draft policy repeats national and local policy and should be more focused. Requests clarity on what applicants must submit and when.	• Comments noted. The policy has been reviewed for clarity, focus and implementation requirements.	No further changes required.
Village Concerns • Objects. Raises concerns about East Hoathly sewage network capacity, frequent overflows into the River Cuckmere catchment, lack of upgrades, lifting of planning conditions, inadequate future wastewater treatment proposals, and local low water pressure.	• Comments noted. The concerns highlight the importance of ensuring water and wastewater infrastructure implications are properly considered through plan-making and development management.	Part 7 of the Policy has been amended.
Transport Futures East Sussex • Supportive. Agrees with the principles and considers the policy detailed and largely uncontroversial, but notes that delivery would be supported by reducing reliance on private motor vehicles.	• Support noted. Wider transport matters are addressed elsewhere in the Local Plan.	No direct policy change proposed.
Clarity Ecoworks • Supportive. No detailed comments provided.	• Support noted.	No action required.

Local Residents	WDC Response	Changes made to policy/chapter
Local Residents Local residents submitted grouped comments in support, objection and neutral positions. The main issues raised were: • Concerns that existing foul water, surface water and water supply infrastructure is already inadequate, including sewage overflows, flooding, low water pressure and wastewater treatment constraints. • Requests that no new development should be occupied until necessary water and wastewater infrastructure improvements are completed, including support for Grampian conditions. • Concerns about Southern Water performance, sewage spills, pumping station failures and the ability of utility companies to provide timely infrastructure upgrades. • Support for stronger requirements for sustainable water use, including water-efficient appliances, rainwater harvesting, grey-water reuse, mandatory water meters and sustainable landscaping. • Requests for stronger separation of foul sewage and surface water drainage, and for SuDS to be properly designed, maintained and monitored.	• Comments noted. The Local Plan will consider water environment and infrastructure matters through plan-making and development management, while recognising the statutory responsibilities of water undertakers and the role of other regulatory regimes. The concerns raised support review of Policy NE13 to ensure the policy is clear, effective and capable of addressing water quality, infrastructure capacity, sustainable water management, cumulative effects and sensitive environmental receptors. • Where matters relate to the ownership or national regulation of water companies, these sit outside the scope of the Local Plan. However, concerns about infrastructure capacity, wastewater treatment, flooding, surface water drainage and environmental protection are relevant to the policy and supporting text.	A number of refinements to policy wording and supporting text have been undertaken.

• Concerns about impacts on ordinary watercourses, riparian responsibilities, groundwater, Pevensey Levels, Shortbridge Stream, floodplains and wider water quality. • Requests for larger buffer zones or development restrictions around sensitive water environments, including the Pevensey Levels. • Requests for cumulative impacts of development, existing commitments and permissions to be assessed. • Concerns about specific local examples including East Hoathly wastewater capacity, Pook Reed Lane surface water drainage and planning applications that could affect the Pevensey Levels. • Suggestions that the policy should better address climate adaptation, natural flood management, ecosystem-based water management, education, public engagement and partnership working.		

Policy NE14: Contaminated Land and Land Stability

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 36	**Support:** 28	**Neutral:** 4	**Object:** 4

Policy NE14 – Contaminated Land and Land Stability		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Suggested strengthening bullet point 2b so risks to sensitive receptors are avoided and fully mitigated. • Suggested amending bullet point 2c to avoid ambiguity and ensure any risks to waterbodies, groundwater and aquifers are avoided.	• Comments noted. It has been necessary to review and streamline the policy and as such parts 2b and 2d have been reviewed and these comments taken into account.	Part 2 of the Policy has been amended.
Network Rail • Supported Policy NE14. • Considered the policy provides an opportunity to take account of land stability and potential landslips around the rail network. • Suggested development should not adversely affect land stability where this could impact the safe and efficient running of the railway.	• Comment of support noted. • Land stability point noted.	No further action required.

Neighbouring/Other Local Authorities	WDC Response	Changes made to policy/chapter
No comments.	n/a	n/a
Town/Parish Councils	**WDC Response**	**Changes made to policy/chapter**
Heathfield and Waldron Parish Council • Supported Policy NE14. • Suggested bullet point 3 should not allow unacceptable adverse impacts on sensitive receptors to be mitigated where harm cannot be avoided or prevented. • Considered that the word "unacceptable" introduces uncertainty.	• Comment of support noted. The comments on wording and certainty are noted and small revisions have been made to part 3 of the policy.	Part 3 of the policy revised.
Mayfield and Five Ashes Parish Council • No comment, as the policy is unlikely to be relevant to the Parish.	• Noted.	No action required.
Rotherfield Parish Council • Supported Policy NE14. • Suggested the Council should ensure the public has access to information required under bullet points 1 and 2 where there may be health and wellbeing implications.	• Comment of support noted.	No further action required.
Polegate Town Council • Supported Policy NE14.	• Comment of support noted.	No action required.
Laughton Parish Council • Supported Policy NE14.	• Comment of support noted.	No action required.

Horam Parish Council • Objected to Policy NE14. • Suggested bullet point 2c should be amended to require developers to explain why and how there is no inappropriate risk to waterbodies, groundwater and aquifers. • Requested more detailed risk assessment guidance, including environmental site assessment procedures, contamination and instability risk criteria and expert consultation requirements. • Suggested more explicit remediation and land stability mitigation standards. • Considered the policy should recognise natural features and climate change impacts on land stability.	• Comment noted. The requested additional detail and suggested wording changes have been considered against the role of the policy and relevant national/local guidance.	Amendments made to the policy and supporting text generally.
Withyham Parish Council • Supported Policy NE14. • Suggested strict conditions should apply in accordance with the policy.	• Comment noted.	No further action required.
Site Promoters	**WDC Response**	**Changes made to policy/chapter**
No comments.	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Hertfordshire Holdings (Tor & Co) • Suggested much of the policy repeats national/local policy and guidance and could be removed to make the policy more focused.	• Comment noted. The Policy has been reviewed and streamlined to cover these issues.	The policy has been streamlined and restructured. No further changes are required.

• Suggested the Council should clarify what applicants are expected to submit and when.		
Willingdon Residents' Association • Raised concerns about sewerage and wastewater management in the Willingdon area. • Considered there is no appropriate policy to manage additional sewerage demand arising from overdevelopment. • Raised concerns about the need for new and upgraded treatment works and improved drainage infrastructure.	• Comment noted. The issues raised are primarily related to wastewater and drainage infrastructure rather than contaminated land and land stability.	No direct change to Policy NE14 required.
Dicker Residents Association • Supported Policy NE14 and no change required.	• Comment of support noted.	No action required.
Clarity Ecoworks • Supported Policy NE14 and no change required.	• Comment of support noted.	No action required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
• Support was expressed for Policy NE14. • Suggested enforcement procedures should be in place through the planning process to make land safe for surrounding neighbourhoods and environs. • Objection was raised to Policy NE14. • Concern that the policy requirements could encourage developers to develop greenfield sites because soil removal may be cheaper than on brownfield sites and housing on greenfield land may be easier to market.	• Comment of support noted. • Concerns regarding enforcement and greenfield/brownfield delivery are noted and have been considered in the context of the policy's purpose and wider plan policies.	No further changes required to those identified above.

Historic Environment

Policy HE1: The Conservation, Protection and Enhancement of the Historic Environment

WDC Response to the Regulation 18 Consultations

Total: 108	Support:95	Neutral:5	Object:8

Policy HE1: The Conservation, Protection and Enhancement of the Historic Environment		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Environment Agency • Policies HE1, HE2 and HE3 should support flood resilience measures, such as raised floor levels and elevated building design, where necessary. • The policies should be aligned to ensure that heritage requirements, including height restrictions and conservation considerations, do not prevent appropriate flood mitigation measures.	• While flood resilience measures are important, Policies HE1-HE3 are intended to protect the historic environment. Flood risk is addressed through the Climate Change chapter, including proposed Policy HE6 on Climate Change and the Historic Environment. Development proposals will be assessed on their individual merits, with the planning balance determining their acceptability.	• No change to policies HE1- HE3 but a policy will be added on Climate Change and the Historic Environment.

Historic England • The Historic Environment chapter should be shorter, more focused on local issues, and avoid repeating national policy. • Policies HE1 and HE2 should be reviewed to reduce overlap and clarify their distinct roles. • Heritage considerations should be embedded across all Local Plan policies, not just the heritage chapter. • A positive heritage strategy should be supported by a robust evidence base and inform site allocations. • Site allocations should be informed by heriage evidence. • A Heritage SPD or Strategy could help deliver policy objectives and guide future development.	• The chapter has been streamlined to reduce repetition of national policy. • A Heritage Strategy has been prepared to support the Local Plan, provide the evidence base, identify key heritage issues and opportunities, and help reduce duplication within the chapter. • Site allocations are informed by Heritage Impact Assessments, which identify heritage assets, assess potential effects on significance, and recommend measures to avoid, minimise or mitigate harm.	Policies and supporting text has been considerably overhauled and updated. Duplication of national policy has been removed.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
None received.	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
<u>Developers and Land Agents</u> **Tor and Co (on behalf of Hertfordshire Holdings)** • The need for Policies HE1 and HE2 is questioned, as they largely reflect national policy. • If retained, they should align fully with the NPPF and national guidance. • Heritage submission requirements should be set out in the Local Validation List.	• It is accepted that there is repetition between HE2 and a number of other policies.	Policy HE2 has been removed. Text has been updated.

Grassroots Planning (on behalf of South West Strategic Developments) • Agree with draft policy HE1 The Conservation, Protection and Enhancement of the Historic Environment.	• Welcome the support.	No action required.
Organisations with Specific Interest **High Weald National Landscape** • Supports the policy and requests recognition of the historic environment's contribution to the National Landscape's character, sense of place and natural beauty, including its influence on settlement patterns, building materials and local building traditions.	• The supporting text already talks to the role of the historic environment more generally.	No action required to policy. Text has been added to the supporting text to refer to the three national character areas.
Conservators of Ashdown Forest • Include reference to Ashdown Forest's open landscape character, recognising the importance of conserving heathland and preventing changes that would erode its openness.	• The Heritage Strategy will refer to historic landscape character areas and area specific character of place. It is not considered necessary to add this policy.	No action required.
Clarity Ecoworks • Agree with draft policy HE1 The Conservation, Protection and Enhancement of the Historic Environment.	Welcome the support.	No action required.

Greenbank • Supports Policy HE1 but suggests encouraging contemporary design within heritage settings rather than pastiche development. • Notes that unrecorded heritage assets may still have significance and should not be discounted simply because they are absent from the Historic Environment Record.	• Welcome the support. • The Heritage Strategy does discuss the HER and its limitations.	No action required.
Uckfield Community Technology College • Supports Policy HE1 and recommends strengthening the identification and protection of locally significant heritage assets, including those not currently recorded in official databases. • Suggests greater community involvement through local working groups and regular updates to the Historic Environment Record. • Seeks stronger protection for overlooked heritage landscapes and assets, drawing on local knowledge as well as formal evidence.	• Welcome the support. • We do hope to prepare a Local List but given the resources available to us this will not happen before the Regulation 19 Consultation. As and when we produce a Local List there will be community engagement	No action required to the policy.
<u>Campaign Groups</u> **Transport Futures** • Agree with principles and descriptors: very detailed and on the whole uncontroversial. The aspirations are, again, good. In all cases their attainability would be greatly aided and	• This is outside the scope of this policy to introduce measures to reduce car ownership and usage.	No action required.

enhanced by reductions in numbers and private motorised vehicles.		
<u>Residents Associations</u> **Dicker Residents Association** • Supports Policy HE1 and seeks recognition of the Low Weald and its locally significant features, including historic farm buildings and isolated dwellings, within the historic environment.	• Welcome the support. • The historic environment does include the Low Weald.	No action required.
Willingdon Residents Association • Supports Wealden's approach to heritage conservation and the requirement for archaeological assessment before development.	• Welcome the support.	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council • Strongly support Policy HE1 The Conservation, Protection and Enhancement of the Historic Environment**.**	• Welcome the support.	No action required.
Polegate Town Council • Agree with draft policy HE1. • There should be more emphasis on attracting tourism to aid the local economy and explore the possibilities of a council owned and run motor home park.	• Welcome the support. • There is a separate tourism policy in the draft Local Plan. The policy does not need to repeat these.	No action required.

Horam Parish Council • Does not support Policy HE1, arguing it focuses too heavily on the built environment and should give greater recognition and protection to the historic rural landscape, including field patterns, ridge roads and settlement settings. • Recommends stronger protection for heritage assets, clearer enhancement criteria, greater stakeholder engagement, and recognition of heritage tourism opportunities	• Policy HE1 and the supporting evidence already address landscape character, including historic field patterns, ridge roads and rural heritage. • The Heritage Strategy provides detailed evidence on Wealden's historic landscapes, heritage issues and opportunities, so further policy detail is unnecessary. • The revised policy strengthens references to landscape character and heritage significance. • Enhancement measures are necessarily site-specific and guided by significance, policy and supporting evidence. • Heritage tourism is addressed through separate tourism policies and the Heritage Strategy.	Definition of historic environment added to supporting text which makes it clear that it includes physical remains and landscapes. Reference added in footnote to PPG paragraph 3 which gives some examples of enhancement measures.
Withyham Parish Council, Rotherfield Parish Council, Willingdon and Jevington Parish Council, Laughton Parish Council, Chalvington with Ripe Parish Council, Isfield Parish Council • Agree with/ support draft policy HE1 The Conservation, Protection and Enhancement of the Historic Environment.	Welcome the Support.	No action required.
Frant Parish Council, Maresfield Parish Council	• Welcome the support. • Supporting text has been amended and now talks to protecting and	Amendments made to supporting text.

• Supports Policy HE1 but seeks stronger recognition of the historic environment's role in community identity and wellbeing. • Recommends strengthening protection-focused wording in the supporting text. • Suggests amendments to address cumulative impacts, important views within heritage settings, above-ground structures, and cases where harm cannot be fully mitigated.	conserving the historic environment as well as above ground archaeology. • Amendments to schemes would be discussed as part of the planning application process. Does not need to be in the policy.	
Uckfield Town Council • Supports Policy HE1, particularly its approach to cumulative impacts, important views and pollution effects on heritage assets. • Recommends greater involvement of local heritage groups and parish councils in major applications, alongside Historic England. • Seeks clarification on how cumulative impacts under Policy HE1(c) will be assessed and enforced.	• Welcome the support. • Applicants will be expected to demonstrate how they have considered cumulative change as part of their application.	No action required.
Buxted Parish Council • Supports Policy HE1 but recommends encouraging contemporary design in heritage settings and recognising the potential significance of unrecorded heritage assets that may not appear in the Historic Environment Record.	• Welcome the support. • Contemporary extensions including those to historic buildings, are referred to in the design policies. • The Heritage Strategy does discuss the HER and its limitations in section 5.10.	No action required.
Heathfield and Waldron Parish Council	• Welcome the support. • The importance of ridge roads are referred to in the Heritage Strategy, in	No action required.

• Supports Policy HE1 but seeks stronger wording to ensure non-compliant proposals are refused and recommends explicit recognition and protection of historic ridge roads.	the Historic Landscape Character section. No need to repeat in policy or supporting text.	
Arlington Parish Council • Supports Policy HE1 but seeks greater recognition, protection and reuse of non-designated heritage assets, including through the creation of a Local List.	• Welcome the support. • Non-designated heritage assets are now recognised within Policy HE1. • The Council also intends to prepare and maintain a Local List of non-designated heritage assets supported by published selection criteria.	No action required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Principle of the Policy • The majority of respondents agree with the policy.	• Welcome the support.	No action required.
High Weald National Landscape • Objects to large-scale development in the High Weald AONB, citing potential harm to its heritage landscape and rural character. • Requests reassessment of development sites on the High Weald ridge and stronger emphasis on compliance with Policy NE7.	• Site allocations have been reassessed to inform the Regulation 19 Local Plan consultation. • The Local Plan is to be read as a whole. No need to reference draft policy NE7.	No action required.
Climate Change and the Environment • Seeks stronger support for adapting heritage assets to modern needs, including energy efficiency and renewable energy measures.	• A new policy (Policy HE6) has been added on Climate Change and the Historic Environment.	A new policy (Policy HE6) has been added on Climate Change and the Historic Environment.

• Recommends specific policies on climate change adaptation, environmental performance and sustainable management of heritage assets.		
Modernisation and New Builds • Supports heritage conservation but seeks greater flexibility to enable the modernisation and sustainable maintenance of historic buildings. • Recommends that new development reflects local architectural character.	This is covered by the design policies and the updated Design Guide, as well as the High Weald Housing Design Guide.	No action required.
Rural Environment • Policy HE1 focuses too heavily on the built environment and should give greater recognition to the historic rural landscape, including field patterns, droveways, ancient routes and industrial heritage features. • Concerns that village housing allocations may undermine the protection and enhancement of heritage assets and local character.	• Policy HE1 already addresses landscape character, with further detail on historic landscapes, field systems, roads, farmsteads and woodland provided in the Heritage Strategy. • Additional policy wording is not necessary, as these matters are covered by the supporting evidence base. • Heritage considerations have been undertaken to inform site allocations.	No action required.
Tourism • Suggests greater emphasis on heritage tourism as a means of supporting the local economy while conserving and promoting the historic environment.	• There is a separate tourism policy. The supporting text to this policy explains the importance of the district's heritage to sustainable tourism.	No action required.

Stakeholders • Recommends stronger engagement with local communities, heritage groups and conservation experts to inform heritage conservation and reuse decisions.	• There is already an opportunity to contribute and stakeholder involvement, both in terms of the Local Plan and on Planning Applications.	No action required.
Conservation Areas • Requests explicit reference to the protection and enhancement of Conservation Areas in Policy HE1. • Recommends working with parishes to identify and designate new Conservation Areas, including consideration of locally valued landscapes and green spaces. • Specifically proposes Budletts Common as a new Conservation Area.	• There is a separate policy on Conservation Areas. The Plan should be read as a whole. • A conservation area boundary review does not relate to the Local Plan and any amendments would happen outside of the Local Plan process.	No action required.
Non designated Heritage Assets • Recommends creating parish-level Local Lists to capture locally significant heritage assets not recorded in existing databases, including a Local List for Uckfield.	• The Council intends to prepare and maintain a district wide local list of non-designated heritage assets supported by published selection criteria in due course. It has not been possible to carry this out at the same time as the work on the Local Plan.	No action required.
Setting • The the impact of development is often determined more by its setting, landscaping and screening than by the building design itself.	• This is covered in the Design policies and updated Design Guide.	No action required.

Digital Documentation and Public Access (including HER) • Recommends greater use of digital technology to document heritage assets and improve public access to heritage information. • Calls for regularly updated heritage records informed by local knowledge and community participation.	• The NPPF already encourages recording. East Sussex County Council maintains the HER. • The Council intends to prepare and maintain a district wide local list of non-designated heritage assets supported in due course.	No action required.
Sites • Supports the policy in principle but argues that proposed housing allocations conflict with heritage protection objectives, particularly where they may harm listed building settings and village character.	• Each site allocation has been reviewed prior to the Regulation 19 consultation.	No action required.
Wording of the Policy and Supporting Text • Recommends greater recognition of the historic rural environment, including field patterns, settlement settings and landscape character, together with clearer criteria for enhancement. • Supports stronger protection of important views and the cumulative impacts of development on heritage assets and landscapes.	• Policy HE1 and the supporting evidence already address landscape character, including historic field patterns, ridge roads and rural heritage. • The revised policy strengthens references to landscape character and heritage significance.	See amended wording to policy.
Decision Making and Enforcement • Raises concerns that heritage policies and specialist advice can be overridden in decision-making.	• It should be noted that planning applications are assessed on their own merits.	No action required.

• Calls for greater weight to be given to heritage impacts, particularly on setting, views and amenity, while allowing proportionate alterations to historic buildings.		

Policy HE2: Heritage Assets

WDC Response to the Regulation 18 Consultation

Total: 67	Support:49	Neutral:5	Object:13

Please note this policy has been deleted prior to the Regulation 19 Consultation following comments regarding duplication and length.

Policy HE2: Heritage Assets		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Environment Agency • Recommends that heritage policies better support flood resilience measures and ensure heritage restrictions do not prevent appropriate flood mitigation.	• A separate policy (HE6) has been added on Climate Change and the Historic Environment which will cover adaptation	No change to policies HE1- HE3 but a policy has been added on Climate Change and the Historic Environment.

Historic England • The Historic Environment chapter is overly lengthy and repeats national policy; it should be more concise, locally focused and clearly structured. • There is overlap between Policies HE1 and HE2, and with asset-specific policies, which could be reduced to clarify their distinct roles.	• Policy HE1 is considered necessary as a strategic policy on the Conservation, Protection and Enhancement of the Historic Environment. We have amended the policy and have simplified the wording where required.	Policies and supporting text have been shortened and NPPF repetition removed. Policy HE2 has been removed.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
None received.	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
<u>Developers and land agents</u> **Tor and Co (on behalf of Hertfordshire Holdings)** • Questions the need for Policies HE1 and HE2 as they largely repeat national policy. • If retained, they should align fully with the NPPF and national guidance, with heritage submission requirements clearly set out in the Local Validation List.	• It is accepted that there is repetition between HE2 and a number of other policies. It is considered that the other policies are required and set out our local approach to the historic environment, albeit they will be significantly shortened. Validation requirements have been removed from the policies.	Policy HE2 has been removed. Text either moved to other policies (including two new policies) or removed where it duplicates the NPPF.
Nevill Estate Company, Beal's Farm Charcuterie • Objects to Policy HE2, arguing that the definition of non-designated heritage assets is too broad and subjective, potentially creating unnecessary restrictions and bureaucracy.	• The Council intends to prepare and maintain a district wide local list of non-designated heritage assets supported by published selection criteria in due course.	No action required.
Grassroots Planning (on behalf of South West Strategic Developments)	• Welcome the support.	No further action required.

• Supports Policy HE2 but argues criterion 12 is inconsistent with national policy, as it requires both heritage and public benefits to outweigh less than substantial harm.	• Policy HE2 to be removed as a result of other comments, including regarding repetition of the NPPF.	
Wates Development • Supports the protection of designated heritage assets but considers Policy HE2 inconsistent with the NPPF. • Objects to requiring heritage benefits to offset less than substantial harm, arguing this may be impractical and is not required by national policy. • Recommends aligning the policy with the NPPF by focusing on public benefits and referring to optimum viable use only where appropriate.	• Welcome the support. • Policy HE2 to be removed as a result of other comments, including regarding repetition of the NPPF. •	No action required.
ASP • Supports the aims of Policy HE2 but seeks clearer guidance on identifying non-designated heritage assets. • Raises concerns about the lack of a Local List and published Conservation Area Appraisals, creating uncertainty for applicants. • Recommends clear assessment criteria and supporting evidence to improve consistency and transparency in decision-making.	• The draft character appraisal documents are available on the WDC website apart from 3 which are still in production. These will all be part of a separate consultation. • The Council intends to prepare and maintain a district wide local list of non-designated heritage assets supported by published selection criteria in due course.	No action required.
Folkington Estate	• Policy HE2 to be deleted as a result of other comments.	No further action required.

• Supports the protection of heritage assets but seeks stronger safeguards against development that would harm the rural settings of heritage assets. • Recommends removing the word "normally" from Policy HE2(4) and recognising the Pevensey-Lewes Roman Road as a locally important heritage asset.		
Batchellor Monkhouse • Supports Policy HE2 in principle but seeks clearer guidance on what constitutes a non-designated heritage asset. • Recommends adopting a Local List to provide certainty for applicants and improve consistency in decision-making.	• The Council intends to prepare and maintain a district wide local list of non-designated heritage assets supported by published selection criteria in due course.	No amendments required.
<u>Organisations with specific interest</u> **High Weald National Landscape** • Supports Policy HE2 but recommends recognising historic public realm features as non-designated heritage assets, particularly within the High Weald National Landscape. • Seeks supporting text on the contribution of historic public realm features to local character.	• Welcome the support. • Added wording to policy HE1 to incorporate other non designated heritage assets. • A new policy on Climate Change and the Historic Environment has been added.	Policy HE1 amended and new policy on climate change and historic environment.

• Recommends explicit reference to Historic England guidance on improving the energy performance of historic buildings.		
National Trust • Supports Policy HE2, particularly the protection of heritage asset settings, important views and energy efficiency measures in historic buildings.	Welcome the support.	No action required.
Clarity Ecoworks • Agree with draft policy HE2: Heritage Assets. • No change required.	• Welcome the support.	No action required.
Greenbank • Emphasises the importance of heritage settings in development decisions and recommends greater use of local knowledge to identify non-designated heritage assets through parish and town councils.	• The importance of setting is reflected in Policy HE1. • The Council intends to prepare and maintain a district wide local list of non-designated heritage assets supported by published selection criteria in due course.	No action required.
<u>Resident Associations and Campaign Groups</u> **Village Concerns** • Supports Policy HE2 but is concerned that heritage objections and specialist advice can be overridden. • Seeks stronger policy wording to ensure greater weight is given to heritage considerations in decision-making.	• Welcome the support. • It should be noted that planning applications are assessed on their own merits.	No action required.

Dicker Residents Association • Agree with draft policy HE2: Heritage Assets.	• Welcome the support.	No action required.
Transport Futures East Sussex • Supports Policy HE2 and its heritage objectives, but notes that reducing private vehicle use would help achieve its aims.	• Welcome the support. • This is outside the scope of this policy to introduce measures to reduce car ownership and usage.	No action required
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council • Strongly support Policy HE2: Heritage Assets.	• Welcome the support.	No action required.
Rotherfield Parish Council • Supports Policy HE2 but seeks greater recognition of energy efficiency improvements to historic buildings, including measures such as modern double glazing that can support net zero objectives while preserving heritage character.	• Welcome the support. • A new policy on Climate Change and the Historic Environment is now included in the Pan.	New Policy HE6: Climate Change and the Historic Environment added.
Horam Parish Council • Objects to Policy HE2 and proposes stronger protection for heritage assets. • Recommends consultation with the East Sussex Historic Environment Record, clearer criteria for heritage asset identification, stronger public engagement, and greater emphasis on adaptive reuse.	• Policy HE2 has been removed and replaced in part by a new Policy HE7. • Reference to consulting the Historic Environment Record when preparing heritage statements is Policy HE1 supporting text. • The Council intends to prepare a district-wide Local List of non-	Policy and supporting text to policy HE1 sets out the importance of a heritage statement and what it needs to do.

• Suggests requiring Heritage Impact Assessments and strengthening safeguards against the loss or harm of heritage assets.	designated heritage assets with published selection criteria. • Public engagement is already supported through planning consultations, Conservation Area Appraisals, neighbourhood plans and local listing processes. • Heritage Statements are already required through the Council's validation requirements and do not need to be repeated in policy.	
Withyham Parish Council • Agree with draft policy HE2: Heritage Assets. • No change required.	• Welcome the support.	No action required.
Isfield Parish Council • IPC supports these draft policies.	• Welcome the support.	No action required.
Heathfield and Waldron Parish Council • Supports Policy HE2 but recommends consultation with the Historic Environment Record, stronger protection against heritage harm, and clearer safeguards where heritage assets are lost. • Seeks clearer guidance on heritage asset identification, public involvement, adaptive reuse and the use of Heritage Impact Assessments.	• Welcome the support. • The Historic Environment Record will remain a key source for heritage statements and this requirement will be transferred to Policy HE1. • Policy HE2 will be removed, with a new Policy HE7 introduced to address the change of use or loss of heritage assets.	Policy and supporting text to policy HE1 sets out the importance of a heritage statement and what it needs to do.

Uckfield Town Council • Supports Policy HE2 and the recognition of both heritage and non-heritage assets. • Recommends greater involvement of local heritage groups and parish councils in major applications. • Suggests stronger protection of heritage assets during redevelopment and construction, highlighting the loss of locally valued but undesignated buildings. •	• Welcome the support. • Public engagement on heritage matters is already supported through planning consultations, Conservation Area Appraisals, neighbourhood plans and local listing initiatives. • Consultation of the Historic Environment Record remains a key requirement for heritage statements. • Concerns about damage to historic buildings through neglect are already addressed by national policy.	No action required.
Frant Parish Council, Maresfield Parish Council • Supports Policy HE2 but seeks stronger requirements for heritage assessment, protection and mitigation. • Recommends consulting the Historic Environment Record, recognising important views and settings, and strengthening evidence requirements where harm or loss is proposed. • Supports a Local List, greater public involvement, adaptive reuse, and a whole-building approach to energy efficiency improvements. • Seeks stronger protection for archaeological assets, historic materials and newly identified heritage assets.	• Welcome the support. • Reference to the Historic Environment Record and wider evidence sources retained in supporting text to Policy HE1. • Policy HE2 deleted and a new Policy HE7 on the change of use or loss of heritage assets. • A district-wide Local List of non-designated heritage assets will be prepared in due course. • Existing consultation processes already provide opportunities for public involvement in heritage matters. • Guidance on artistic interest has been clarified, and supporting text will recognise non-designated	Amendment to Policy HE1 And a new policy to be added HE7: The Change of Use or Loss of Heritage Assets.

	heritage assets identified through planning applications.	
Buxted Parish Council • Supports Policy HE2 but emphasises the importance of heritage settings in assessing development impacts. • Recommends using local knowledge to identify non-designated heritage assets, including updating parish and town-level asset lists.	• Welcome the support. • The importance of setting is reflected in Policy HE1. • A district-wide Local List of non-designated heritage assets will be prepared in due course.	No action required.
Chalvington with Ripe Parish Council • Supports stronger recognition of energy efficiency measures in historic buildings and recommends giving significant weight to carbon reduction and modernisation improvements when balancing heritage impacts.	• Policy HE2 deleted and a new policy on Climate Change and the Historic Environment added.	No action required.
Pevensey Parish Council • Objects to Policy HE2, arguing that changes of use for non-designated heritage assets should only be supported where they represent the optimum viable use and conserve the asset's significance and features.	• Policy HE2 is deleted with the text related to optimum viable use moved to the new Policy HE7 and more general text on NDHAs moved to Policy HE1.	See amended policies
Polegate Town Council • Agree with draft policy HE2: Heritage Assets. • ensure that any heritage assets identified are quickly dealt with by the district council in a timely manner.	• Welcome the support.	No action required.

Laughton Parish Council • Supports Policy HE2 but seeks greater flexibility for energy efficiency improvements to historic buildings, including low-carbon heating, insulation and double glazing.	• Agree that there needs to be some flexibility but subject to certain caveats.	New policy HE6 added on Climate Change and the Historic Environment.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Principle of policy • The majority of respondents agreed with this policy. • Welcomes the strong safeguards for heritage assets, while recognising that some loss may be unavoidable in exceptional circumstances.	• Welcome the support.	No action required.
Energy Efficiency and Environmental Performance • Recommends stronger policy support for improving the energy efficiency and sustainability of heritage assets, including insulation, low-carbon technologies and renewable energy. • Highlights the need for detailed guidance to ensure energy efficiency measures do not damage historic buildings.	• Policy HE2 deleted and a new policy on Climate Change and the Historic Environment added.	Policy HE6: Climate Change and the Historic Environment added.
Heritage Statements • stronger emphasis on Heritage Impact Assessments needed, making them a standard requirement for relevant developments to better assess and mitigate impacts on heritage assets.	• The requirement for Heritage Statements is set out in our validation criteria. It does not need to be repeated in policy.	The supporting text to policy HE1 will reiterate the importance of a heritage statement and what it needs to do.

Identifying Heritage Assets and Local List • Seeks clearer criteria and processes for identifying heritage assets, including non-designated assets. • Raises concerns over the absence of a Local List and the broad definition of non-designated heritage assets, which could create uncertainty and unnecessary restrictions.	• A district-wide Local List of non-designated heritage assets will be prepared in due course.	No action required.
Public Engagement • Recommends stronger community engagement in identifying, valuing and conserving heritage assets, recognising the importance of public knowledge and local stewardship.	• Existing consultation processes already provide opportunities for public involvement in heritage matters.	No action required.
Adaptive Reuse • Recommends stronger support for the adaptive reuse of heritage assets, including community-led uses, to help secure their long-term conservation and viability.	• Policy HE2 is removed as a result of other comments. However, a new policy HE7 is to be added on the Change of Use or Loss of Heritage Assets which will incorporate parts of HE2 and support the change of use of heritage assets subject to certain criteria.	See policy wording for HE7.
Heritage at Risk and Being More Proactive • Recommends exploring financial incentives, grants and other support mechanisms to encourage the conservation and restoration of heritage assets, particularly those at risk.	• It is not the role of the Local Plan to provide grants.	No action required.

Wording of Policy (that is not covered elsewhere). • Sronger wording needed to ensure any harm to heritage assets or their settings is resisted, and replacing discretionary terms such as "normally" and "expect" with more definitive policy language.	• Policy HE2 is to be deleted as a result of other comments.	No action required.
Other Comments	**WDC Response**	
Other comments which are not directly related to the policy which have been raised by the general public include the following: • Emphasises the importance of protecting irreplaceable heritage assets as a core principle of the Local Plan. • Requests greater recognition of Pevensey's heritage significance and tourism value. • Opposes development that would result in the loss of ancient woodland.	• Welcome the support. • There is a separate policy on Ancient Woodland.	No action required. .

Policy HE3: Conservation Areas

WDC Response to the Regulation 18 Consultations

Total: 92	Support:78	Neutral:4	Object:10

Policy HE3: Conservation Areas		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Environment Agency • Recommends that heritage policies better support flood resilience measures, such as raised floor levels and flood-resistant design. • Seeks alignment between heritage and flood risk policies to ensure heritage controls do not hinder necessary flood mitigation.	• A separate policy (HE6) has been added on Climate Change and the Historic Environment which will cover adaptation	No change to policies HE1- HE3 but a policy has been added on Climate Change and the Historic Environment.
Historic England • Support draft policy HE3 Conservation Areas, although the Historic Environment chapter would benefit from condensing and removing NPPF quotes.	• This policy is considered necessary. We have improved to the policy and simplified the wording where required.	The policy is simplified.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
• None received.	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Organisations with specific interest	• New wording added which refers to the historic public realm, including	See amended policy wording.

High Weald National Landscape • It may be appropriate to include a reference to the historic public realm in Conservation Areas in policy HE3.	public spaces, green areas and street furniture.	
Clarity Ecoworks • Agree with draft policy HE3 Conservation Areas.	• Welcome the support.	No action required.
Campaign Groups **Village Concerns** • Supports Policy HE3 but is concerned that heritage policies and specialist advice can be overridden in decision-making. • Seeks stronger safeguards to ensure greater weight is given to heritage considerations and expert heritage advice.	• Welcome the support. • It should be noted that planning applications are assessed on their own merits.	No action required.
Transport Futures East Sussex • Supports Policy HE3 and its objectives but notes that reducing private vehicle use would help achieve conservation area enhancement goals.	• Welcome the support. • It is outside the scope of this policy to introduce measures to reduce car ownership and usage.	No action required.
Rotherfield Protection Group • Supports Policy HE3 but recommends amending the wording to align with the NPPF by referring to the need to sustain and enhance the significance of heritage assets.	• Welcome the support. • The Planning (Listed Buildings and Conservation Areas) Act 1990 refers to 'preserve and enhance'. The NPPF already refers to sustaining. No need for repetition.	No action required.

<u>Residents Associations</u> **Dicker Residents Association** • Supports Policy HE3 and requests recognition of the Low Weald's distinct character, with conservation measures extending beyond the High Weald to reflect the relationship between heritage and landscape.	• Welcome the support. • The High Weald is not a Conservation Area but a National Landscape and it is not possible to designate these as part of a Local Plan. The Low Weald is recognised as a National Character Area in the introduction to HE1.	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Polegate Town Council, Chalvington with Ripe Parish Council, Frant Parish Council, Isfield Parish Council, Mayfield and Five Ashes Parish Council • Agree with/ supports draft policy HE3 Conservation Areas.	• Welcome the support.	No action required.
Horam Parish Council • Does not support Policy HE3 and seeks greater emphasis on conserving and enhancing public spaces, green areas and street furniture within Conservation Areas. • Recommends clearer criteria for designation and development, together with stronger measures to identify and address heritage assets at risk.	• Reference to the public realm added. • Conservation Area Character Appraisals, the Design Guide and the High Weald AONB Design Guide provide the detailed guidance sought and are more appropriate than policy wording. • The Council already takes a proactive approach to heritage assets at risk through Conservation Area Appraisals, boundary reviews and Management Plans.	The policy has been updated.
Uckfield Town Council	• Welcome the support.	The policy has been updated.

• Supports Policy HE3 but requests a review of Conservation Area boundaries, including those in Uckfield. • Recommends recognising the contribution of historic street scenes to Conservation Area character.	• Conservation area boundary reviews do not relate to the Local Plan process. • Reference to the public realm added.	
Rotherfield Parish Council • Supports Policy HE3 but seeks greater recognition of energy efficiency improvements in Conservation Areas, including measures such as modern double glazing that can support net zero objectives while preserving historic character.	• Welcome the support • Agree that Climate Change and the Historic Environment needs more consideration.	New policy HE6 on Climate Change and the Historic environment added.
Pevensey Parish Council • Objects to Policy HE3, arguing that Conservation Area Character Appraisals are not available to inform compliance. • Considers Policy HE3(1c) unnecessary, as existing Conservation Area protections are already provided through legislation.	• The draft Conservation Character Appraisals are available to view on our website. • Agree that the wording of part 3 is clumsy and could read better.	Policy wording updated.
Arlington Parish Council • Supports Policy HE3 and seeks wider use of Conservation Areas to help protect the character of rural villages while accommodating sustainable development.	• Welcome the support. • This policy does not prevent development but rather seeks to ensure that development seeks to preserve or enhance the special character of the Conservation Area.	No change needed.
Crowborough Town Council	• Conservation area boundary reviews are part of the Local Plan process.	No action required.

• The council would like to see the extension of the Conservation Area within the town to encompass the Rush site and Fieldbuss newsagents, and to include the first floor.		
Heathfield and Waldron Parish Council • Supports Policy HE3 but proposes adding "and" between criteria to make clear that all requirements must be met.	• Welcome the support. • The policy woring will be clear when referring to what criteria should be met.	No action required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Principle of policy • The majority of respondents support the policy.	• Welcome the support.	No action required.
Wording • Recommends stronger protection and enhancement of public spaces, green areas and street furniture, recognising their importance to Conservation Area character and quality.	• Public realm wording added to policy.	See revised policy wording.
Guidelines • Clearer guidance needed on acceptable development within Conservation Areas, including materials, design and construction approaches, while supporting high-quality contemporary design that respects local character.	• This level of detail cannot go in the policy but will be found in the Conservation Area Character Appraisals, Design Guide and the High Weald AONB Design Guide.	Text added to supporting text that we will not discourage contemporary approaches.

Designation of Conservation Areas • Clearer and more transparent criteria needed for designating new or extended Conservation Areas. • Suggests designating Berwick Station and Budletts Common as Conservation Areas and raises concerns about risks to Westham Conservation Area.	• This is not part of the Local Plan process. The criteria is set out by the PLBCA Act. • Conservation area boundary reviews are part of the Local Plan process.	No action required.
Climate Change and the Environment • Recommends greater emphasis on climate adaptation and environmental performance within Conservation Areas, including flood resilience, sustainable landscaping and energy efficiency improvements to historic buildings.	• Agreed.	A new policy on Climate Change and the Historic Environment has been included.
Public Engagement • Recommends stronger community engagement in the management of Conservation Areas to ensure conservation decisions reflect local values, needs and priorities	• The public will be formally consulted on the draft Conservation Area Character Appraisals and the future Management Plans when they happen.	No action required.

Heritage at Risk • Recommends proactive measures to identify, prioritise and protect heritage assets at risk within Conservation Areas. • Suggests encouraging the reuse and regeneration of vacant historic buildings, including mixed-use and workspace opportunities.	• We already take a proactive approach to Grade II* and Grade I Listed Buildings and the CAs are being addressed through the Character Appraisals and boundary amendments. The Management Plans will also help address buildings at risk.	No action required.
Decision Making • Seeks clearer assessment criteria to reduce subjectivity in decision-making. • Raises concerns that heritage policies and expert advice can be overridden, and that some developments fail to preserve or enhance Conservation Areas. • Suggests stronger use and enforcement of existing Conservation Area legislation.	• As regards Conservation Areas, the policy outlines the considerations that we take into account. Conservation Area Character Appraisals also outline characteristics of the area that might be relevant. • Enforcement is a matter of balance in the planning process and will be determined on a case by case basis.	No action required.
Other Comments	**WDC Response**	
Other comments which are not directly related to the policy which have been raised by the general public include the following: • Emphasises the irreplaceable nature of heritage assets and suggests this should be a core principle of the Local Plan. • Calls for stronger protection and management of retained features during development, including trees.	• Noted. Policies are set out in the Local PLan covering heritage assets, trees. Proposed site allocations are considered against these requirements through the wider evidence base.	No action required.

• Objects to large-scale development affecting the AONB, SSSIs, the High Weald and Ashdown Forest.		

HE4: Enabling Development

WDC Response to the Regulation 18 Consultation

Total: 40	Support:37	Neutral:1	Object:2

Policy HE4: Enabling Development		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Historic England • Support draft policy HE4, although the Historic Environment chapter would benefit from condensing and removing NPPF quotes.	• Welcome the support. • Other policies have been removed or shortened to avoid repetition.	No action required to this policy but supporting text is shortened.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
• None received.	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Organisations with Specific Interest **Clarity Ecoworks** • Agree with draft policy HE4 Enabling Development.	• Welcome the support.	No action required.

<u>Campaign Groups</u> **Village Concerns** • Agrees with draft policy HE4 Enabling Development	• Welcome the support.	No action required.
Transport Futures East Sussex • Agree with draft policy HE4 Enabling Development and its objectives but notes that reducing private vehicle use would help achieve conservation area enhancement goals.	• Welcome the support. • A reduction in the number of cars would have little effect on enabling development.	No action required.
<u>Residents Associations</u> **Dicker Residents Association** • Agree with draft policy HE4 Enabling Development. • Conservation barriers should be higher and you need greater statutory power over developers.	• Welcome the support. • We are bound by the legislation and national policy. Changes to statutory powers are outside the scope of the Local Plan.	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Heathfield and Waldron Parish Council, Horam Parish Council, Withyham Parish Council, Frant Parish Council, Polegate Town Council, Rotherfield Parish Council, Buxted Parish Council, Isfield Parish Council, Mayfield and Five Ashes Parish Council • Agree with/ support draft policy HE4 Enabling Development.	• Welcome the support.	No action required.

Local Residents	WDC Response	Changes made to policy/chapter
Principle of Policy • The majority of respondents agree with draft policy HE4 Enabling Development.	• Welcome the support.	No action required.
Environmental Performance • Recommends greater emphasis on improving the environmental performance of heritage assets, including energy efficiency, biodiversity enhancement and climate change adaptation	• Agreed and new policy covering energy performance in historic buildings is now included in the plan. The need for a policy related to the historic environment and Climate Change has also been raised in the Heritage Strategy. • Enabling development is about addressing the conservation deficit.	Policy HE7 will be added on Climate Change and the Historic Environment.
Wording of the Policy • Recommends tighter definitions of exceptional circumstances and long-term management and maintenance plans to secure the ongoing conservation of heritage assets.	• This would depend on the individual circumstances of each case. Historic England offers guidance on the subject.	No action required.
Further Guidance Required • Recommends clearer guidance on how public benefits are assessed and balanced against harm, including consideration of public access, education and long-term community benefits.	• This would depend on the individual circumstances of each case and could not be defined in a policy. The Historic England guidance talks to when enabling development may be justifiable.	No action required.
Funding • Questions whether applicants should be required to demonstrate that all funding	• There is an explanation in the Historic England guidance.	No action required.

sources have been explored if their financial circumstances are not taken into account when assessing the viability of restoring a heritage asset.		
Concerns • Raises concerns that the policy could be misused to justify unpopular developments and reduce community influence in decision-making. • Seeks stronger safeguards, greater community involvement, and higher design standards for the conversion and reuse of existing buildings.	• The right exists and is in the Act. It is tightly controlled and the potential for misuse is therefore very low. • Enabling development is very controlled and this would only occur where it is justified, as per part c of the policy and other guidance, and the appropriate evidence provided.	No action required.
Statutory Power and Enforcement • There needs to be stronger enforcement on developers and house owners to ensure the policies are followed.	• Our Planning Enforcement team investigates complaints of alleged breaches of planning control to determine if a breach has occurred and what action, if any, is required.	No action required.
High Weald National Landscape • Development to the immediate Heritage assets should be allowed but it should not be used to open up development other areas of the AONB as an off-set. It will simply open up development of AONB.	• Enabling development is very controlled and this would only occur where it is justified, as per part c of the policy and other guidance and the appropriate evidence provided.	No action required.
Other Comments	**WDC Response**	
Other comments which are not directly related to the policy which have been raised by the general public include the following:	• Noted.	No action required.

• The opening sentence of paragraph 7.11 should be the over-riding guiding principle of this entire draft Local Plan.		

HE5: Historic Parks and Gardens

WDC Response to the Regulation 18 Consultation

Total: 38	Support:34	Neutral:2	Object:2

Policy HE5: Historic Parks and Gardens		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Historic England • Supports draft policy HE5 Historic Parks and Gardens, although the Historic Environment chapter would benefit from condensing and removing NPPF quotes	• Welcome the support. • Other policies have been removed or shortened to avoid repetition.	Policy wording updated.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
• None received.	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
<u>Organisations with specific interest.</u> **National Trust** • Supports the policy for protecting historic parks and gardens and welcomes their recognition as heritage assets.	• Welcome the support.	No action required.

• Supports measures to restore historic features and improve public access, particularly at Sheffield Park.		
Friends of the South Downs • Agree with draft policy HE5 Historic Parks and Gardens. • Supports protection of historic parks and gardens, recognising the importance of the setting of heritage assets such as Wootton Manor.	• Welcome the support.	No action required.
<u>Resident Associations and Campaign Groups</u> **Dicker Residents Association, Village Concerns** • Agree with draft policy HE5 Historic Parks and Gardens.	• Welcome the support.	No action required.
Transport Futures East Sussex • Agrees with draft policy HE5 Historic Parks and Gardens but notes that reducing private vehicle use would help achieve conservation area enhancement goals.	• Welcome the support. • It is outside the scope of this policy to introduce measures to reduce car ownership and usage.	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Rotherfield Parish Council, Frant Parish Council, Isfield Parish Council • Agree with/ support draft policy HE5 Historic Parks and Gardens.	• Welcome the support.	No action required.
Uckfield Town Council	• Welcome the support.	No action required.

• Supports Policy HE5 and the protection of historic parks and gardens, including their settings and key views. • Emphasises the importance of protecting vistas and providing buffer zones around heritage and landscape assets.	• Setting is already a consideration- see criteria b. It will be different in every case therefore setting up a buffer zone would not be practical.	
Horam Parish Council • Recommends strengthening Policy HE5 to better protect the integrity of historic parks and gardens and ensure public benefits clearly outweigh any harm. • Seeks more guidance on conservation, restoration and biodiversity enhancement. • Supports greater educational, community and volunteer involvement in the stewardship of historic parks and gardens.	• Some amendments will be made to the policy based on the commments – in relation to views within historic parks and gardens. • There are links provided in the supporting text to further guidance. Also, the design guide will address historic landscapes. • The amount or quality of biodiversity is not relevant to why a park may be registered.	See amended policy wording.
Mayfield and Five Ashes Parish Council • Strongly supports draft policy HE5 Historic Parks and Gardens.	• Welcome the support.	No action required.
Buxted Parish Council (and one other respondent) • Broadly supports Policy HE5 but emphasises the importance of protecting the setting and views of historic parks and gardens. • Notes some policy duplication and recommends buffer zones to help safeguard heritage assets from nearby development.	• Welcome the support. • We have restructured the policies and split them up so as to try and avoid repetition. • Setting is already a consideration. It will be different in every case therefore setting up a buffer zone would not be practical.	Policies restructured and repetition removed.

Heathfield and Waldron Parish Council • Supports Policy HE5 but recommends adding protection for the integrity of historic parks and gardens and ensuring public benefits clearly outweigh any harm. • Seeks stronger guidance on conservation, biodiversity enhancement, and community engagement in the management of historic parks and gardens.	• Welcome the support. • Policy wording amended to refer to integrity.	Policy wording amended.
Polegate Town Council • Agrees with draft policy HE5 and believe that everything should be done to preserve these areas that either have a heritage asset or an asset of community value.	• Welcome the support.	No action required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Principle of Policy • The majority of respondents agree with the draft policy.	• Welcome the support.	No action required.
Setting • Seeks stronger protection for the settings of historic parks and gardens, including buffer zones, and opposes development that would harm their significance or rural character.	• Setting is already a consideration. It will be different in every case therefore setting up a buffer zone would not be practical.	No action required.
Education • Recommends better recognition of the educational, community and volunteering	• This is not appropriate for inclusion in the policy.	No action required.

benefits of historic parks and gardens to encourage public engagement and stewardship.		
Maintenance and restoration • Recommends clearer guidance on the maintenance and restoration of historic parks and gardens, alongside sustainable visitor management measures that balance public access with conservation.	• This is beyond the scope of the policy. There are links provided in the supporting text to further guidance. Also, the design guide will address historic landscapes.	No action required.
Environmental Performance and Climate Change • Recommends strengthening the policy to address climate change adaptation and biodiversity within historic parks and gardens, including resilient planting, water management and habitat creation. • Seeks greater emphasis on improving the environmental performance of heritage assets.	• Separate policy added on the Historic Environment and Climate Change.	Policy HE7 added on Climate Change and the Historic Environment.
Register of Parks and Gardens • Recommends recognising and protecting additional historic parks and gardens, including Lake Wood, and strengthening protection of its relationship with Grade II Buckswood Grange.	• The process for registering a park or garden is through Historic England. When we prepare a local list we will assess whether any meet the criteria and could be considered non-designated heritage assets.	No action required.
Other Comments	**WDC Response**	

Other comments which are not directly related to the policy which have been raised by the general public include the following: • Requests careful consideration of the impact of development on views to and from Horsted Place (reference to Owlsbury). • Emphasises that the irreplaceable nature of the historic environment should be a guiding principle of the Local Plan.	• This has been considered when assessing the site for allocation.	Consider in site allocation evidence.

Policy HE6: Archaeology

WDC Response to the Regulation 18 Consultation

Total: 39	Support:37	Object:1	Neutral:1

Policy HE6: Archaeology		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Historic England • Supports draft policy HE6 Archaeology, although the Historic Environment chapter would benefit from condensing and removing NPPF quotes.	• Welcome the support.Other policies have been removed or shortened to avoid repetition.	Policy wording updated.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**

ESCC County Archaeologist • Satisfied that they will be consulted by WDC on individual applications through the development management process and in accordance with the Service Level Agreement. No further comments.	• Comments are noted.	No action required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
<u>Resident Associations and Campaign Groups</u> **Transport Futures** • Agree with draft policy HE6 Archaeology but notes that reducing private vehicle use would help achieve conservation area enhancement goals.	• Welcome the support, • It is outside the scope of this policy to introduce measures to reduce car ownership and usage.	No action required.
Dicker Residents Association, Village Concerns. • Agree with draft policy HE6 Archaeology.	• Welcome the support.	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council • Strongly support draft policy HE6 Archaeology.	• Welcome the support.	No action required.
Heathfield and Waldron Parish Council, Horam Parish Council, Frant Parish Council, Polegate Town Council, Willingdon and Jevington Parish Council, Isfield Parish Council • Agree with/ support draft policy HE6 Archaeology.	• Welcome the support.	No action required.

Uckfield Town Council • Supports Policy HE6 but seeks stronger protection of historic landscapes and their relationship to heritage assets. • Questions whether development should be permitted on or adjacent to important archaeological and heritage sites, except where it directly supports their interpretation or appreciation. • Recommends giving greater weight to local knowledge in identifying and assessing heritage significance.	• The policy already mentions setting but have made clearer. • Each application will be assessed on its own merits. • ESCC Archaeologists do have extensive local knowledge and will be consulted on applications that affect a site of archaeological interest.	See amended policy.
Rotherfield Parish Council • Agree with draft policy HE6 Archaeology. • The policy places considerable requirements on developers where ancient sites would be affected.	• Welcome the support. • The policy is considered the minimum necessary to explain what we require from applicants and to ensure our archaeology is protected.	No action required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Principle of Policy • The majority agree with draft policy HE6 Archaeology. • General support for Policy HE6 and recognises archaeological assets as irreplaceable resources that are essential to understanding Wealden's history and cultural heritage.	• Welcome the support.	No action required.
Environmental Performance • No policy on enhancing the environmental performance of heritage assets.	• Agreed. The need for a policy related to the historic environment and	Policy HE7 added on Climate Change and the Historic Environment.

	Climate Change has also been raised in the Heritage Strategy.	
Public Education and Community Engagement • Recommends greater emphasis on public education and community engagement, including interpretation, events and access to archaeological findings.	• This would be site specific, covered in a WSI agreed by ESCC County Archaeologist.	No action required.
Wording of the Policy • Seeks stronger protection for archaeological remains through more detailed assessments, firmer policy wording and greater reliance on expert advice. • Objects to development-led excavation where remains could otherwise be preserved in situ.	• We cannot mandate what archaeological surveys are required as it will be different in each case and is a validation matter. • A WSI is not required in every case, will be for the County Archaeologist to determine.	No action required.
Clear Guidance Required • Clearer guidance needed on archaeological discoveries during development, including assessment, notification and mitigation procedures. • Seeks stronger criteria for deciding between preserving remains in situ and excavation.	• The majority of this is covered in the Sussex Archaeological Standards. It is outside the remit of the Local Plan. • We rely on the comments from the County Archaeologist as to what works are required.	No action required.
Accessibility of Finds • Recommends stronger requirements for the analysis, reporting, publication and long-term curation of archaeological finds to maximise their research and public value.	• This would be considered on a case by case basis and as part of a WSI.	No action required.
Other Comments	**WDC Response**	

Other comments which are not directly related to the policy which have been raised by the general public include the following: • Street naming should better reflect local history, people and events, and reviewing restrictions on naming streets after locally significant families. • Emphasises that the irreplaceable nature of the historic environment should be a guiding principle of the Local Plan.	• This is out of the remit of the Local Plan.	No action required.

Housing

Policy HO1: Housing Type and Mix

WDC Response to the Regulation 18 Consultations

Total: 388	Support: 78	Neutral: 208	Object: 102

Policy HO1 - Housing Type & Mix		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
None		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Developers and agents (30)</u> **ASP** Object – policy overly restrictive and inflexible Does not reflect changing lifestyles and household needs Housing mix should vary by site size and local context	• Policy created based on local need, as evidenced in LHNA (January 2026) and justified in Viability Assessment (September 2026). • Housing mix justified based on LHNA and considered viable as per the viability assessment. • Criteria 5 aims to enable site specific assessment, to allow for flexibility	Amended Criteria 5 to clarify the justified circumstances. Amended Criteria 7 to provide clarity on use.

Paragraphs 5 and 7 unclear/unworkable	sought. However, revisions have been made to ensure clearer criteria are applied. • Criteria 7 aims to prevent subdivision of larger bedrooms into smaller bedrooms, thus increasing the number of bedrooms in a property, which would be contrary to the evidence base on need. However, revisions have been made to ensure clearer criteria is applied.	
Batcheller Monkhouse Overly prescriptive policy with limited flexibility	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of deviation from the housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.
Boakes Land Projects Generally supported as a starting point Must be viability-led and flexible over time Paragraph 7 unclear	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment Criteria 7 aims to prevent subdivision of larger bedrooms into smaller bedrooms, thus increasing the number of bedrooms in a property, which would be contrary to the evidence base on need. However, revisions have been made to ensure clearer criteria is applied.	Amended Criteria 7 to provide clarity on use

Commented [SP1]: Choose option base don how HO1 is revised

Catesby Strategic Land Limited Overly restrictive and lacks regard to settlement differences May impact delivery	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment that shows that it can be delivered. Seeks to provide smaller units in all settlements, including rural settlements. Criteria 5 provides flexibility in terms of deviation from the housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.
Esquire Developments and TWRFC Policy overly prescriptive: it would limit bespoke design and market responsiveness	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of deviation from the housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.
Firle Estate Paragraphs 2 and 3 should be deleted	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. The two paragraphs listed are those that control delivery of unit size, thus need to be retained for the policy to be effective.	Comment noted. No changes required.
Gladman Developments Limited Policy overly prescriptive	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of	Amended Criteria 5 to clarify the justified circumstances.

Housing mix should be determined by site context	deviation from the housing mix sought.	
Grosvenor Property UK Limited Supportive of the policy Requirements should be updated to reflect the latest Census	The updated LHNA accounts for the latest Census data.	Comment of support noted. No changes required.
Hertfordshire Holdings Greater flexibility required Policy unsuitable for flatted / specialist schemes	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of deviation from the housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.
Landspeed Supportive of the policy	Comment noted	Comment of support noted. No changes required.
Naked Vine Limited Departure from the proposed policy should be supported when evidenced by local housing need Policy should support proposal seeking to address need through the delivery of specialist housing in rural areas	Amended criteria 5 allows for exceptions where set out and evidenced.	Amended Criteria 5 to clarify the justified circumstances.
Persimmon Homes South East Flexibility needed over the plan period Clarification needed as to whether the affordable housing mix includes First Homes	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of	Amended Criteria 5 to clarify the justified circumstances.

Further assessment needed of the effect of delivering to this mix at a greater discount for First Homes.	deviation from the housing mix sought. First Homes are covered under criteria 3 in terms of mix (Affordable housing (ownership)) alongside share ownership.	
Real Select Ltd Questions the proposed level of 1-bed apartment for affordable homes	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of deviation from the housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.
Rockwood Trinity Limited Policy lacks flexibility	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of deviation from the housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.
Sifelle Limited Policy lacks flexibility and could impact on viability Policy won't reflect local need in all places	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of deviation from the housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.
Sigma Strategic Land	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment.	Amended Criteria 5 to clarify the justified circumstances.

Policy provides some flexibility but should be inform by local demand evidenced by local estates agents and experiences developers	Criteria 5 provides flexibility in terms of deviation from the housing mix sought.	
Strategic West Strategic Developments Supportive of the policy Policy wording should be amended to say that the housing mix should be *broadly in accordance with* the mix set out in the policy	Criteria 5 allows for exceptions where set out and evidenced. Criteria 2 and 3 confirm that this is the indicative housing mix for both market and affordable housing.	Comment of support noted. Amended Criteria 5 to clarify the justified circumstances.
Strutt & Parker The plan fails to address Built-to-Rent	Lack of evidence on the delivery or desire for Build to Rent in district in the LHNA, so no requirement to provide, but equally the policy does not prevent Build to Renr in the district coming forward.	Comment noted. No changes required.
Tarn (Mornings Mill) Limited **Earlswood Homes Holdings Limited** **James Fermor** **Hempstead Farm Limited** **Bellway Strategic** **Obsidian Strategic Asset Management Limited** **Fernham Homes (Sussex) Limited**	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 allows for exceptions where set out and evidenced. Criteria 2 and 3 confirm that this is the indicative housing mix for both market and affordable housing.	Comment noted. Amended Criteria 5 to clarify the justified circumstances.

Commented [SP2]: Double check LHNA

Stonebond Properties (Sevenoaks) Limited & Akehurst Homes Limited **Fernham Homes Limited** Policy should recognise that housing need changes overtime Criteria for policy departure are too stringent Private housing mix should be dictated by the market		
Taylor Wimpey UK Ltd Policy not supported by evidence Policy should be a started point and additional should be added to ensure deliverability of the plan Suggested added criteria: • Taking into account the requirements of Registered Providers; and • Accounting for market demands	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 allows for exceptions where set out and evidenced. Criteria 2 and 3 confirm that this is the indicative housing mix for both market and affordable housing. RPs are considered at Policy HO8 (Affordable Housing)	Comment noted. Amended Criteria 5 to clarify the justified circumstances.
Vistry Group Supportive of the policy Flexibility to be maintained to adopt to local context and design of schemes	Comment of support noted. Criteria 5 provides flexibility in terms of deviation from the housing mix sought.	Comment of support noted. Amended Criteria 5 to clarify the justified circumstances.
Registered providers	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment.	Amended Criteria 5 to clarify the justified circumstances.

Hastoe Housing Association Proportion of 1-bed home is too high Preference for 2 and 3-bed homes from longer-term flexibility	Criteria 5 provides flexibility in terms of deviation from the affordable housing mix sought.	
Hyde Housing Suggests alternative housing mix as the proportion of 1-bed affordable homes is too high	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of deviation from the affordable housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.
Orbit Homes High quantum of 1-bed homes makes sites unappealing 2 and 3-bed homes are our preferred affordable home type	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of deviation from the affordable housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.
Town & Country Housing Further flexibility required for 1-bed affordable homes for rent is required	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of deviation from the affordable housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.
<u>Organisations with specific interest</u> **CPRE Sussex**	Comments of support noted. Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment.	Comment noted. No changes required.

The Working Group Against Over Development Supportive of the policy Claims on viability grounds should be carefully examined. The issue of sustainability should not be compromised. Roof voids should not be able to be converted at a later stage.	Criteria 5 provides flexibility in terms of deviation from the housing mix sought in line with the NPPF. Removal of PD rights will be considered at the planning application stage.	
Eastbourne Eco Action Network CIC Need for higher density, lower carbon developments within the 20-minute neighbourhoods	Comment Noted and the Plan is supportive of higher densities at Policy HO3 and the 20-minute neighbourhoods in the spatial strategy chapter.	Comment noted. No changes required.
Forest Row Local CBS Limited Housing design and performance must improve significantly Risk of encouraging the conversion of agricultural buildings into dwellings Policy fails to address design consideration where roof space is left for future extension	Other policies in the Plan seek to address design issues and the conversion of agricultural buildings into dwellings. Conversion of spaces controlled by PD rights largely. Removal of PD rights will be considered at the planning application stage.	Comment noted. No changes required.
Hailsham Community Land Trust Policy fails to reflect local nuances	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 (c) allows for deviation if robust, locally specific housing needs evidence is	Comment noted. No changes required.

	available and supports an alternative mix in localised areas.	
Home Builders Federation Further flexibility required Proposed mix conflicts with RP requirements and First Homes policy	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 allows for exceptions where set out and evidenced. Criteria 2 and 3 confirm that this is the indicative housing mix for both market and affordable housing. First Homes are covered under criteria 3 in terms of mix (Affordable housing (ownership)) alongside share ownership.	Amended Criteria 5 to clarify the justified circumstances.
Transport Futures East Sussex The north of the district lacks affordable homes. Better transport links would help to retain residents.	The policy aims to provide the housing mix needed across the district. Transport links are dealt with elsewhere in the Local Plan.	Comment noted. No changes required.
Resident Associations **Dicker Residents Association** Supportive of the policy Mix should reflect demographic changes	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment.	Comment of support noted. No changes required.
Rotherfield Protection Group Supportive of the policy	The policy aims to limit exceptions to ensure smaller dwellings are proposed on all major development	Comment noted. No changes required.

Villages are more likely to see small scale development that will not apply the proposed mix and not benefit from the provision of smaller homes.	proposals – any development smaller will be considered on a case-by-case basis in line with the LHNA evidence.	
Willingdon Residents' Association Accommodation for older residents is needed	Accommodation for older residents are dealt with in Policy HO11.	Comment noted. No changes required.
Village Concerns Policy is driven by viability rather than need Parishes and towns should be able to assert their own local needs There should be greater reliance on CLTs Clarification should be provided in relation to subdivision, and the provision of additional room should be avoided Proposed percentage of 4+-bed houses too high	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 enables local consideration, including through policies in NPs on a different housing mix.	Amended Criteria 5 to clarify the justified circumstances.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Chiddingly Parish Council Supportive of the policy Provided that there is no joining up of towns/villages	Comments of support noted. Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment.	Comment of support noted. No changes required.
East Hoathly with Halland Parish Council Supportive of the policy Challenges in finding RPs to take on properties in the parish All development should provide affordable homes, with higher proportion in urban settings	Comments of support noted. Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 provides flexibility in terms of deviation from the affordable housing mix sought.	Amended Criteria 5 to clarify the justified circumstances.

Isfield Parish Council Supportive of the policy Housing design and performance must improve significantly Viability should not be argued in Wealden Risk of encouraging the conversion of agricultural buildings into dwellings Support further measure to ensure roofing void are not converted at later dates.	Comments of support noted. Criteria 5 provides flexibility in terms of deviation from the housing mix sought in line with the NPPF. Other policies in the Plan seek to address design issues and the conversion of agricultural buildings into dwellings. Conversion of spaces controlled by PD rights largely. Removal of PD rights will be considered at the planning application stage.	Comment of support noted. No changes required.
Hellingly Parish Council **Rotherfield Parish Council** **Westham Parish Council** • Supportive of the policy • Support the removal of PD to extend new 1, 2 and 3-bed properties.	• Comments of support noted. • Conversion of spaces controlled by PD rights largely. Removal of PD rights will be considered at the planning application stage.	Comment of support noted. No changes required.
Hailsham Town Council Supportive of the policy	Comments of support noted.	Comment of support noted. No changes required.
Heathfield & Waldron Parish Council Supportive of the policy The thresholds for housing mix should be from 5 or more units for para 2, and for 25 or more units for para 3. Affordable tenures need to be better defined.	Comments of support noted. Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Lower thresholds would create complications in terms of delivery.	Comment of support noted. No changes required.

Concerns over enforceability of house subdivisions, and lack of social considerations	Conversion of spaces controlled by PD rights largely. Removal of PD rights will be considered at the planning application stage.	
Horam Parish Council In areas with a neighbourhood plan should rely on local housing need assessment Interpretation of number in para 8.12 is incorrect Costs of meeting higher standards in design and performance should be factored in Need an up to date/recent District wide Design Guide/Design Codes.	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Criteria 5 enables local consideration, including through policies in NPs on a different housing mix. Other comments dealt with elsewhere in the Local Plan.	Comments noted. No changes required.
Laughton Parish Council Supportive of the policy Percentage of 1-bed properties should be increased. The location of new development needs to be reconsidered to ensure affordable housing can be provided on-site	Comments of support noted. Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Affordable Housing dealt with Policy HO8	Comments of support noted. No changes required.
Mayfield and Five Ashes Parish Council Housing mix should reflect current need	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment.	Comments noted. No changes required.
Pevensey Parish Council Supportive of the policy Need to ensure that there are sufficient small homes for social housing	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment.	Comments of support noted. No changes required.

Polegate Town Council Emphasis should be placed on affordable homes for younger people Proposed percentage for 4+-bed homes too high	Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment.	Comments noted. No changes required.
Uckfield Town Council Supportive of the policy A range of property type should be included. Starter and affordable homes need to be closer to public transport and local employment areas.	Comments of support noted. Other comments dealt with elsewhere within the Local Plan.	Comments noted. No changes required.
Willingdon and Jevington Parish Council **Withyham Parish Council** • Supportive of the policy	• Comments of support noted.	Comments noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Broad support for the policy Affordable homes are often sacrificed in developments. Stronger focus on delivering affordable housing is needed. Proportion of affordable housing should be higher (sometimes suggested all homes should be affordable in a crisis). Greater provision of social housing and affordable rented homes. Support for traditional council housing delivery. Affordable housing should be prioritised in rural area but not come at the expense of agricultural land.	Comments of support noted. Policy created based on local need, as evidenced in LHNA and justified in Viability Assessment. Smaller homes generally supported within the policy and by our own evidence. Criteria 5 enables local consideration, including through policies in NPs on a different housing mix. Conversion of spaces controlled by PD rights largely. Removal of PD rights will be considered at the planning application stage.	Amended Criteria 5 to clarify the justified circumstances.

Affordable housing is not needed in certain rural/low-access areas. Need for: o More 1- and 2-bed properties. o Fewer 4+ bed homes o Smaller homes generally. Housing mix should: be flexible; reflect local needs and settlement characteristics; be based on clear local evidence. Parishes/towns should have stronger influence over local housing mix. Concern that delivered housing mix does not match what is promised. Concern about oversupply of large properties. Need to consider: o Accommodation for disabled people. o Provision for older people (e.g. bungalows, retirement villages). o Housing for key workers. o Housing design and performance must improve significantly. o Strong support for higher design and performance standards. Need for: o Minimum space standards. o Balanced living and sleeping space. o Consideration of garden sizes. Design policies should: o Be strengthened. o Be supported by an up-to-date design guide/code. Concerns about:	Other policies in the Plan seek to address design issues, climate change, rural exception sites, space standards for new dwellings, the spatial distribution of residential development and the conversion of agricultural buildings into dwellings. Criteria 5 provides flexibility in terms of deviation from the housing mix sought in line with the NPPF.	

Design quality of new developments. Lack of consideration for future extensions (roof/loft space). Development should be in sustainable locations. Concerns over sustainability of: ○ Rural sites. ○ Agricultural building conversions. Calls for: ○ Carbon-neutral development. ○ District energy, storage, and communal infrastructure. Recognition that density impacts affordability and sustainability. The policy may encourage inappropriate conversion of agricultural buildings. Need for stricter criteria for agricultural building conversion with better sustainability safeguards. Some support for conversion near villages if delivering small homes. Support for: ○ Higher density housing in appropriate locations. ○ Efficient land use. ○ Variable density approaches depending on context. • Concerns about density affecting house prices. Policy too influenced by viability and market factors. Policy biased towards most profitable development types.		

Emphasis on viability should be removed or reduced. Factor policy costs into land purchase price. Need for greater reliance on Community Land Trusts (CLTs). Recognition of differing views between developers, residents, and planners. Greater weight should be given to Neighbourhood Plan evidence and Local community needs. Applications should be considered on their own merits and with site-specific flexibility. Policy seen by some as overly prescriptive. Policy should: Allow flexibility across different towns/villages. Avoid overly rigid housing mix requirements. Need for clearer guidance on subdivision of dwellings and future extensions. Support for shared amenities, communal gardens and allotments and central hubs in larger developments. Local people should be prioritised for housing in their area. Objection to: Overall scale of housing proposed. Construction of further housing in some cases. Diversity of housing types within single estates (minority view). Concerns about access to housing, delivery gaps and policy clarity and wording. Large developments should not occur in AONB.		
Other Comments	**WDC Response**	
None		

Policy HO2: Density

WDC Response to the Regulation 18 Consultations

Total: 321	Support: 48	Neutral: 245	Object: 28

Policy HO2: Density		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Natural England The policy should include the requirement to provide sensitive and limited density which it may impact National Landscape and National Parks.	• Comment noted. The policy itself considers landscape character at criteria 1(c) and moreover, there are separate policies in the Natural Environment Chapter that consider both the setting of the South Downs National Park and the High Weald National Landscape in this respect.	Comment noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
Eastbourne Borough Council Supportive of making effective and optimal use of land Increased density should be considered, particularly in sustainable locations and town centre to increase home supply Emphasis that higher densities should align with accessibility levels and this should be stronger in policy	Comments of support noted. The Council agrees that higher densities are generally more appropriate in the most sustainable and accessible locations, including town and village centres and locations well served by public transport, services, facilities and employment opportunities. Policy HO2 already seeks to achieve this through criterion 1(d), which	Comment noted. No changes required.

Development on the boarder with EBC will be meeting the wider housing needs of Eastbourne residents. Further considerations should be given to the neighbouring need and opportunities should be explored to enable Eastbourne residents to access affordable housing elsewhere within the wider market area. Proposals should deliver mixed and balanced communities across the wider area.	requires density to be informed by existing and future accessibility to services, facilities, employment opportunities and public transport, including opportunities for walking and cycling. The Council considers that the policy strikes an appropriate balance between making efficient use of land and ensuring that development responds positively to local character, environmental constraints, infrastructure capacity and placemaking considerations. This flexibility is important given the varied urban and rural character of the district. The Council does not consider it necessary for Policy HO2 to refer specifically to meeting the housing needs of neighbouring authorities. Cross-boundary housing matters are addressed through the spatial strategy and overall housing requirement for the Local Plan. The purpose of Policy HO2 is to ensure residential developments optimise site capacity and make the most effective and efficient use of land, whilst delivering high-quality,	

	sustainable and well-designed places.	
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Developers and agents **Boakes Land Projects** Supportive of the policy Suggest replacing "capacity" with "developable area" Oppose need for minimum density standards	Comments of support noted. The Council considers that "capacity" is the more appropriate term. The policy is concerned with understanding the amount and form of development that a site can accommodate having regard to design, environmental, infrastructure and placemaking considerations, rather than simply the extent of land that is capable of being developed. The existing wording therefore better reflects the purpose of the policy. Making efficient use of land is a key objective of the Local Plan and this can assist in ensuring land is used effectively, particularly in sustainable and accessible locations.	Comment noted. No changes required.
BP Supportive of the policy	Comments of support noted.	Comment of support noted. No changes required.
Grosvenor Property UK Ltd Support non-prescriptive, case-by-case approach Support varying densities across sites to reflect character and landscape,	Comments of support noted.	Comment of support noted. No changes required.
Hertfordshire Holdings	Comments of support noted.	Comment of support noted. No changes required.

Support effective use of land and design-led density approach Density should consider design quality, transport, and placemaking Concern existing density evidence may restrict innovation Recommend aligning policy with national design guidance	It is considered that the policy aligns with the NPPF (December 2024) and national design guidance in respect of density	
Landspeed Supportive of the policy Higher densities appropriate on strategic/brownfield sites Support introduction of a minimum density standard	Comments of support noted. Making efficient use of land is a key objective of the Local Plan and this can assist in ensuring land is used effectively, particularly in sustainable and accessible locations.	Comment of support noted. No changes required.
Savills Supportive of the policy and case-by-case approach Support non-prescriptive density based on local context and constraints	Comments of support noted.	Comment of support noted. No changes required.
Sclater Estates Ltd Support site-specific density approach Concern about inappropriate, out-of-character developments Need to prevent small gardens and overdevelopment	Comments of support noted. Overdevelopment is dealt with through other policies within the Local Plan.	Comment of support noted. No changes required.
SSP Support site-by-site density assessment Oppose blanket density standards Need clear space standards to prevent overdevelopment and ensure appropriate layouts	Comments of support noted. Overdevelopment and space standards are dealt with through other policies within the Local Plan.	Comment of support noted. No changes required.

Registered providers **Hyde Housing** Support case-by-case approach Higher density (especially affordable housing) requires supporting infrastructure.	Comments of support noted.	Comment of support noted. No changes required.
Organisations with specific interest **CPRE Sussex** Support policy and case-by-case approach Support site-specific minimum densities Support increased density in sustainable towns to reduce greenfield loss	Comments of support noted. Making efficient use of land is a key objective of the Local Plan and this can assist in ensuring land is used effectively, particularly in sustainable and accessible locations.	Comment of support noted. No changes required.
Resident Associations **Dickers Residents Association** Supportive of the policy Concern case-by-case approach creates inconsistencies Suggest minimum density standard	Comments of support noted. Given the differing levels of densities across the district (as defined in the evidence) the need for case-by-case decisions on densities in line with criteria 1a – e is considered the preferred approach.	Comment of support noted. No changes required.
The Working Group Against over Development Support policy and efficient land use to reduce greenfield loss Support site-specific minimum densities (especially rural/windfall sites)	Comments of support noted. Making efficient use of land is a key objective of the Local Plan and this can assist in ensuring land is used	Comment of support noted. No changes required.

Support higher density in towns to reduce pressure on greenfield land	effectively, particularly in sustainable and accessible locations.	
Village Concerns Support higher density, apartment-led development in sustainable locations Emphasis on meeting housing need and promoting active travel with green/social spaces	Making efficient use of land is a key objective of the Local Plan and this can assist in ensuring land is used effectively, particularly in sustainable and accessible locations.	Comments noted. No changes required.
Willingdon Residents Association Supportive of the policy Support density controls to avoid overcrowding Emphasis on adequate garden space, privacy, and resident amenity	Comments of support noted. Specific design issues dealt with elsewhere within the Local Plan.	Comments noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
East Hoathly with Halland Parish Council Supportive of the policy Density should be site-specific Oppose use of generic density ratios, especially in rural areas	Comments of support noted.	Comments noted. No changes required.
Hailsham Parish Council Supportive of the policy Concern about reliance on Urban Capacity Study (too simplistic) Study does not adequately assess appropriate density or design quality Need for more robust evidence base and validation Support for use of design codes to guide density and form Concerns about lack of transparency and robustness in windfall assumptions	Comments of support noted. The evidence base is considered robust and based prevailing densities at that time. Since the 204 version of the Local Plan, the Council has developed its own design guide. Windfall development is dealt with as part of the spatial strategy.	Comments noted. No changes required.

Heathfield and Waldron Parish Council Supportive of the policy Concern about potential high-rise development in rural settlements	Comments of support noted.	Comments noted. No changes required.
Horam Parish Council Density should reflect NPPF (lower at settlement edges) Support for maximum density standards to prevent overcrowding Concern about parking, congestion, and emissions Concern about high-rise in rural settlements Need for up-to-date district-wide design guidance	Making efficient use of land is a key objective of the Local Plan and this can assist in ensuring land is used effectively, particularly in sustainable and accessible locations. The evidence base is considered robust and based prevailing densities at that time. Since the 204 version of the Local Plan, the Council has developed its own design guide. Given the differing levels of densities across the district (as defined in the evidence) the need for case-by-case decisions on densities in line with criteria 1a – e is considered the preferred approach.	Comments noted. No changes required.
Isfield Parish Council Density should be assessed on a site-by-site basis, particularly on windfall sites in rural locations.	Comments noted and agreed that the principle of applying densities on a case-by-case basis in line criteria 1 a-e.	Comments noted. No changes required.
Laughton Parish Council Concern about developer influence over decision-making Support for minimum density standards Support for well-designed higher density to reduce land take	Making efficient use of land is a key objective of the Local Plan and this can assist in ensuring land is used effectively, particularly in sustainable and accessible locations.	Comments noted. No changes required.

Sites should be rejected if density is too low Concern about loss of farmland and environmental impacts	The evidence base is considered robust and based prevailing densities at that time.	
Mayfield and Five Ashes Parish Council Supportive of the policy	Comments of support noted.	Comments of support noted. No changes required.
Polegate Town Council Concern about existing over-dense development Need more green and utility space Open space must be balanced with development Larger sites should secure on-site open space and facilities Infrastructure should be delivered before occupation Concern about cramped layouts and spacing between properties Land availability should be considered	Making efficient use of land is a key objective of the Local Plan and this can assist in ensuring land is used effectively, particularly in sustainable and accessible locations. The evidence base is considered robust and based prevailing densities at that time. Other issues on infrastructure, open space overdevelopment are considered elsewhere in this Local Plan.	Comments noted. No changes required.
Rotherfield Parish Council Supportive of the policy Support case-by-case approach reflecting settlement differences Oppose minimum density standards Note environmental and character considerations may require lower densities	Comments of support noted	Comments of support noted. No changes required.
Uckfield Town Council Supportive of the policy Support case-by-case approach Density must reflect landscape, topography, and context Example of overdevelopment (Ridgewood Farm)	Comments of support noted and agreed that the principle of applying densities on a case-by-case basis in line criteria 1 a-e.	Comments of support noted. No changes required.

Concern about high-density harming landscape and views Oppose minimum density standards		
Withyham Parish Council Supportive of the policy	Comments of support noted	Comments of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Support for draft Policy HO2 Density Support for case-by-case (site-specific) approach Concern that case-by-case approach is subjective or open to challenge/manipulation Suggestion for minimum and maximum density standards Suggestion for tailored density (by location e.g. centres vs edges) Density should reflect local character, grain and settlement pattern Concern about developments being out of character Concern about overly dense developments / "cramming" Need to prevent very small or inadequate garden sizes Call for minimum garden size standards Need for adequate private and communal green space Importance of green space for wellbeing, biodiversity, drainage, and recreation Density should consider biodiversity and environmental constraints (BNG, LNRS, NRN) Exclude constrained land (e.g. ancient woodland buffers) from density calculations	Making efficient use of land is a key objective of the Local Plan and this can assist in ensuring land is used effectively, particularly in sustainable and accessible locations. The evidence base is considered robust and based prevailing densities at that time. Since the 204 version of the Local Plan, the Council has developed its own design guide. Given the differing levels of densities across the district (as defined in the evidence) the need for case-by-case decisions on densities in line with criteria 1a – e is considered the preferred approach. Other policies relating to design, landscape character, open space provision, ancient woodland, BNG, infrastructure capacity, brownfield land and housing mix are dealt with in other parts of the Local Plan.	Comments noted. No changes required.

Support for higher density in sustainable locations and town centres Support for apartments / building upwards Concern that high density harms community cohesion and mental health Concern about unattractive, poor-quality design in dense schemes Need to improve design quality alongside density Density must consider infrastructure capacity (schools, healthcare, transport) Concern about inadequate infrastructure to support higher density Parking pressures and increased congestion concerns Density should reflect settlement hierarchy and NPPF principles (e.g. lower at edges) Prioritise brownfield land for higher density development Concern about overdevelopment in certain villages/areas Balance needed between efficient land use and liveability Promote smaller homes at appropriate densities Consider alternative layouts (e.g. shared open space, mixed-use schemes) Need for community facilities (schools, medical, childcare) in larger schemes Importance of community consultation and local input Concern developments are imposed on communities		

Criticism of recent developments as too dense / poor layout / unsellable Policy needs clearer wording and stronger guidance Need for robust criteria and transparent decision-making Density should account for tree planting requirements Suggestion to require on-site green/open space provision Density influences housing affordability and costs Need to align with Neighbourhood Plans Concern about overall housing numbers linked to density		
Other Comments	**WDC Response**	
None		

Policy HO3: Brownfield Land

WDC Response to the Regulation 18 Consultations

Total: 105	Support: 80	Neutral: 13	Object: 12

Policy HO3: Brownfield Land		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Natural England Brownfield land can contain biodiversity interest, and this should be reflected in the policy	• The Council recognises that previously developed (brownfield) land can contain habitats and species of biodiversity value. However, biodiversity considerations are addressed through the Local Plan's biodiversity and natural environment policies, which apply to development proposals on both brownfield and greenfield land. Consequently, no amendment to Policy HO3 is considered necessary.	Comment noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
Tunbridge Wells Borough Council The policy could allow brownfield development beyond settlement boundaries subject to certain criteria	The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites	Comment noted. Amendments have taken place to criterion 1(a) and 1(d) to address the comments on this policy.

Clarify that support for brownfield development is conditional to compliance with other policies in the plan The last part of the policy is unclear.	located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. This clarifies that the policy is not intended to provide unrestricted support for brownfield housing development in the countryside, but note solely in development boundaries either. Criterion 1(d) explicitly states that proposals must accord with all other relevant policies in the Local Plan. This confirms that support for brownfield redevelopment is conditional upon compliance with the wider policy framework, including policies relating to design, infrastructure, the natural and historic environment, flood risk and other material considerations. The final part of the policy has also been retained to clarify the expectations for the form of development on brownfield sites. Paragraph 2 emphasises that, whilst proposals should optimise the use of previously developed land, this must be achieved through high-quality design and without unacceptable harm to local character, residential amenity or environmental quality. This	

	provides guidance on how the policy will be applied alongside the plan's design and place-making policies.	
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Developers and agents **Clarity Ecoworks** Supportive of the policy.	Comment of support noted.	Comment of support noted. No changes required.
Dowsett Mayhew Planning Partnership Policy should include brownfield sites in settlements with defined settlements boundaries Proposed policy restricts growth of smaller settlements reducing potential housing supply	The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. Brownfield development is supported within defined settlements as a matter of principle in Policy SS1.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.
Kitewood Estates Limited Policy should include brownfield sites outside the settlement Policy conflicts with paragraph 123 of the NPPF (maximising brownfield land)	The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.

	development boundary of settlements identified as sustainable within the settlement hierarchy.	
Landspeed Supportive of the policy. Suggest supporting brownfield redevelopment in less sustainable locations where land supply within boundaries is constrained, where there is demand and sufficient viability to deliver policy compliant or high affordable housing	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.
Nevill Estate Company Supportive of the policy. Recommend expanding the policy beyond defined development boundaries, included within the AONB	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. This includes settlements within the High Weald National Landscape where appropriate.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.

Signature Prime Property Policy should include brownfield sites outside the settlement Policy conflicts with paragraph 123 of the NPPF (maximising brownfield land)	The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.
The Marquess of Christophe Abergavenny Supportive of the policy. Seek expansion beyond development boundaries, including rural and High Weald locations.	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. This includes settlements within the High Weald National Landscape where appropriate.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.
<u>Organisation with specific interest</u> **CPRE Sussex** Supportive of the policy	Comment of support noted. Policy HO3 supports the redevelopment of suitable previously developed land within, or well-related to, sustainable settlements and seeks to ensure that such sites are used effectively and	Comment of support noted. No changes required.

The policy has overlooked the opportunity of achieving densification near our town centres through redevelopment. Site outside the development boundaries are usually unsustainable and redevelopment would harm the countryside setting.	efficiently, consistent with Policy HO2 (Density). The Council agrees that development on previously developed land in the open countryside would not generally represent a sustainable pattern of development and could harm the character and setting of the countryside. The Regulation 19 policy therefore limits support to brownfield sites that are located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy.	
<u>Resident Associations</u> **Dicker Residents Association** Supportive of the policy. Support brownfield development even in less sustainable locations to protect greenfield land. Policy should compel use of brownfield land first	Comment of support noted. Policy HO3 supports the redevelopment of suitable previously developed land within, or well-related to, sustainable settlements and seeks to ensure that such sites are used effectively and efficiently, consistent with Policy HO2 (Density). The Council agrees that development on previously developed land in the open countryside would not generally represent a sustainable pattern of development and could harm the character and setting of the countryside. The Regulation 19 policy therefore limits support to	Comment of support noted. No changes required.

	brownfield sites that are located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. The NPPF confirms that policies should promote brownfield land but cannot compel the use of brownfield land first for new development.	
The Working Group Against Over Development Supportive of the policy. Sites outside development boundaries are usually unsustainable dans redevelopment would harm the countryside setting Policy overlooked the opportunity for densification near town centres	Comment of support noted. Policy HO3 supports the redevelopment of suitable previously developed land within, or well-related to, sustainable settlements and seeks to ensure that such sites are used effectively and efficiently, consistent with Policy HO2 (Density). The Council agrees that development on previously developed land in the open countryside would not generally represent a sustainable pattern of development and could harm the character and setting of the countryside. The Regulation 19 policy therefore limits support to brownfield sites that are located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy.	Comment of support noted. No changes required.

Village Concerns Supportive of the policy. Policy should consider development outside the development boundaries on a case-by-case basis Development of greenfield sites should be linked to the delivery of brownfield sites	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Forest Row Parish Council Supportive of the policy Supportive of redevelopment of brownfield site in less sustainable locations subject to linking with to sustainable link or active travel options available to reach facilities.	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.
Hailsham Parish Council Brownfield Land Register fails to identify sites with development potential The Urban Capacity Study cannot be relied on Suitable brownfield sites should be brought forward proactively by the Council	The Local Plan supports the redevelopment of suitable previously developed (brownfield) land through Policy HO3 and this is informed by the evidence base available to the Council, including the Urban	Comments noted. No changes required.

The Character Assessment to establish densities is not fit for purpose Support brownfield reuse but request stronger design guidance (e.g. small sites design code).	Capacity Study. The purpose of Policy HO3 is not to allocate or identify specific brownfield opportunities, but to provide a positive policy framework to support their redevelopment where suitable proposals come forward. The Council does not agree that the Urban Capacity Study or associated evidence cannot be relied upon. The evidence has been prepared to inform plan-making and has been considered alongside other elements of the housing land supply evidence base. Design policies are dealt with elsewhere within the Local Plan.	
Heathfield and Waldron Parish Council Supportive of the policy Policy should consider brownfield sites in less sustainable locations subject to town and villages not joining up Definition of brownfield should be included	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. Brownfield definition is included in glossary and NPPF.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.

Horam Parish Council Policy should consider brownfield sites in less sustainable locations subject to town and villages not joining up Definition of brownfield should be included	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. Brownfield definition is included in glossary and NPPF.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.
Isfield Parish Council Supportive of the policy.	Comment of support noted.	Comments noted. No changes required.
Laughton Parish Council Supportive of the policy. Policy should not support the redevelopment of brownfield sites in less sustainable locations Public footpath requirement viewed as unrealistic and unclear in purpose.	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. The public footpath element of the policy has been replaced by Criterion 1 (c).	Comment noted. Amendments have taken place to criterion 1(a) and 1(c) to address the comment on this policy.

Mayfield Parish Council Supportive of the policy. Sites outside the development boundaries should not be automatically dismissed	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.
Pevensey Parish Council Supportive of the policy It is unclear how this policy would apply to Pevensey Bay given its location in flood zone 3.	Comment of support noted. Flooding policies are dealt with Climate Change chapter of the Local Plan and national planning policy is generally not supportive of residential development within Flood Zone 3.	Comments noted. No changes required.
Polegate Town Council Supportive of the policy. All brownfield sites should be explored	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.

Rotherfield Parish Council Supportive of the policy. Flexibility should be applied to brownfield sites outside the development boundaries Employment sites should be retained policy could reenforced that agricultural building do not fall into the definition of brownfield	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. Employment sites are retained though other policies in the Local Plan. Brownfield definition is included in glossary and NPPF.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.
Uckfield Town Council Supportive of the policy. Supportive of the redevelopment of brownfield sites in less sustainable locations if this refers to old and unused agricultural building Concerns about the limited Brownfield Land Register	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. Brownfield definition is included in glossary and NPPF.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.

Withyham Parish Council Supportive of the policy. Support the redevelopment of brownfield sites in less sustainable locations, which should be considered in the context of the local plan	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy.	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
General support for the policy Mixed views on developing brownfield in less sustainable locations Strong emphasis on prioritising brownfield over greenfield (brownfield-first approach) Calls to extend policy beyond development/settlement boundaries Need for clearer definitions (e.g. brownfield, less sustainable locations) Importance of accessibility and sustainable transport Environmental concerns, including biodiversity and ecological value Design quality and impact on character and landscape Need for safeguards (infrastructure, sustainability, remediation, criteria) Viability and delivery challenges (e.g. contamination, developer preferences)	Comment of support noted. The Regulation 19 version of Policy HO3 has been revised to address this concern. Criterion 1(a) now makes clear that support for housing development on previously developed land is limited to sites located within, or well-related to, the development boundary of settlements identified as sustainable within the settlement hierarchy. The Council recognises that previously developed (brownfield) land can contain habitats and species of biodiversity value. However, biodiversity, natural environment and land contamination considerations are addressed through the Local Plan's biodiversity and natural	Comment noted. Amendments have taken place to criterion 1(a) to address the comment on this policy.

Suggestions for improvements (targets, incentives, mixed-use, stronger policy wording) Recognition of alternative uses (employment, industry, food production, tourism) Preference for case-by-case or criteria-based flexibility Some objections to the policy overall	environment policies, which apply to development proposals on both brownfield and greenfield land. Consequently, no amendment to Policy HO3 is considered necessary.	
Other Comments	**WDC Response**	
None		

Policy HO4: Small and Medium Sized Housing Sites

WDC Response to the Regulation 18 Consultations

Total: 101	Support: 77	Neutral: 13	Object: 11

Policy HO4: Small and Medium Sized Housing Sites		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
None		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**

Developers and agents **Boakes Land Projects** Raised an objection to the policy. Brownfield sites outside settlement boundaries should also be considered suitable. Contradiction between supporting sites near settlements and restricting support to sites within settlement boundaries.	The Regulation 19 version of the policy clarifies that support for small and medium-sized housing sites is subject to compliance with the spatial strategy and other relevant policies of the Local Plan. The policy does not provide support for development on all small and medium-sized sites regardless of location. The Council does not consider it appropriate to support brownfield sites outside development boundaries through this policy. The suitability of previously developed land is addressed separately through Policy HO3 (Brownfield Land), which supports redevelopment only where it is consistent with the spatial strategy and located within, or well-related to, sustainable settlements.	Comments noted. No changes required.
Esquire Developments and TWRFC Raise an objection to the policy. Policy only supports development where all other plan requirements are met, limiting effectiveness and creating contradictions. Submitted preferred wording to improve consistency across councils.	The Regulation 19 version of the policy clarifies that support for small and medium-sized housing sites is subject to compliance with the spatial strategy and other relevant policies of the Local Plan. The policy does not provide support for development on all small and	Comments noted. No changes required.

	medium-sized sites regardless of location.	
Fernham Hones Limited Supportive of the policy. Policy should be amended to provide a stronger mechanism for delivering proportionate sites in smaller rural settlements.	Comment of support noted. Policy HO4 supports residential development on small and medium-sized sites where proposals contribute towards meeting housing needs and comply with the spatial strategy and other relevant policies of the Local Plan. The acceptability of a site's location is therefore considered through the spatial strategy rather than this policy itself.	Comments noted. No changes required.
Firle Estate Supportive of the policy. Policy suggests all four aspirations must be delivered, which may not be feasible on small sites.	Comment of support noted. The Regulation 19 version of the policy conforms at criteria 2 that support will be given to proposals that deliver one or more of the aspirations.	Comment noted. Amendments have taken place to criterion 2 to address the comment on this policy.
Hertfordshire Holdings Policy is inconsistent with draft policy HO1 in terms of mix and size. Policy is flawed due to defining type of development by site size rather than the capacity of the site.	The Regulation 19 version of the policy clarifies that support for small and medium-sized housing sites is subject to compliance with the spatial strategy and other relevant policies of the Local Plan. The policy does not provide support for development on all small and medium-sized sites regardless of	Comments noted. No changes required.

	location or not adhering to the other draft policies of the Plan.	
James Fermor Supportive of the policy. Policy should be amended to provide a stronger mechanism for delivering proportionate sites in smaller rural settlements.	Comment of support noted. Policy HO4 supports residential development on small and medium-sized sites where proposals contribute towards meeting housing needs and comply with the spatial strategy and other relevant policies of the Local Plan. The acceptability of a site's location is therefore considered through the spatial strategy rather than this policy itself.	Comments noted. No changes required.
Landspeed Supportive of the policy.	Comment of support noted.	Comment of support noted. No changes required.
Naked Vine Limited Supportive of the policy. Policy should provide a stronger mechanism for delivering proportionate rural sites addressing specific local housing needs.	Comment of support noted. Policy HO4 supports residential development on small and medium-sized sites where proposals contribute towards meeting housing needs and comply with the spatial strategy and other relevant policies of the Local Plan. The acceptability of a site's location is therefore considered through the spatial strategy rather than this policy itself. The Rural Exceptions (HO7) site policy also considers addressing specific	Comments noted. No changes required.

	local housing needs such as affordable housing.	
Rockwood Trinity Limited Raised an objection to the policy. Greater flexibility is needed as small sites are often constrained by surrounding character.	Comment noted. Policy HO4 supports residential development on small and medium-sized sites where proposals contribute towards meeting housing needs and comply with the spatial strategy and other relevant policies of the Local Plan. The acceptability of a site's location is therefore considered through the spatial strategy rather than this policy itself.	Comments noted. No changes required.
The Marquess of Christopher Abergavenny Raised an objection to the policy.	Comment noted.	Comments noted. No changes required.
Vistry Group Supportive of the policy Welcome clarification that policy applies to sites under 1 hectare.	Comment of support noted.	Comments of support noted. No changes required.
Orginsations with specific interests **Action in Rural Sussex** Supportive of the policy Policy should recognise growing momentum behind community-led housing and development.	Comment of support noted.	Comments of support noted. No changes required.
CPRE Sussex Supportive of the policy. Policy likely to be used for windfall sites.	Comment of support noted.	Comments of support noted. No changes required.

Home Builders Federation Supportive of the policy. Policy should not be used as a reason for failing to meet 10% of the housing requirement on sites under one hectare. Support for small windfall sites is essential to ensure choice of housing and delivery within the plan period.	Comment of support noted.	Comments of support noted. No changes required.
Registered Providers **Hyde Housing** Supportive of the policy. Smaller sites can require similar resourcing and time as larger sites.	Comment of support noted.	Comments of support noted. No changes required.
Residents Associations **Dicker Residents Association** Supportive of the policy. Number of small-scale sites in an area should affect future decision making.	Comment of support noted.	Comments of support noted. No changes required.
Friends of Park Wood Hellingly Supportive of the policy.	Comment of support noted.	Comments of support noted. No changes required.
The Working Group Against Over Development Support of the policy. Policy likely to be used for windfall sites	Comment of support noted.	Comments of support noted. No changes required.
Village Concerns Supportive of the policy.	Comment of support noted.	Comments of support noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Forest Row Parish Council Supportive of the policy.	Comment of support noted.	Comments of support noted. No changes required.

Heathfield Parish Council Supportive of the policy.	Comment of support noted.	Comments of support noted. No changes required.
Horam Parish Council Raised an objection to the policy. Definition should be based on number of dwellings instead of size of the land. Design and sustainability criteria should be strengthened. Specify requirements for energy efficiency, biodiversity enhancements and integration with the local infrastructure services. Provide clear guidelines on how these developments integrate with existing communities.	The Council considers a site area threshold to be an appropriate and widely understood means of identifying small and medium-sized sites for planning purposes, including through the NPPF. The policy is intended to support the delivery of housing on such sites rather than prescribe development capacity. Design quality, sustainability, infrastructure provision and the integration of development with existing communities are addressed through the wider policies of the Local Plan, including policies relating to design, density, infrastructure, climate change and biodiversity. It is not necessary to repeat these requirements within Policy HO4.	Comment noted. No changes required.
Isfield Parish Council Supportive of the policy.	Comment of support noted.	Comments of support noted. No changes required.
Laughton Parish Council Raise an objection to the policy. Concerns that development are coming forward on site of less than 0.5ha to avoid affordable housing provision	The Council considers a site area threshold to be an appropriate and widely understood means of identifying small and medium-sized sites for planning purposes, including through the NPPF. The policy is intended to support the	Comment noted. No changes required.

	delivery of housing on such sites rather than prescribe development capacity.	
Mayfield and Five Ashes Parish Council Supportive of the policy.	Comment of support noted.	Comments of support noted. No changes required.
Pevensey Parish Council Supportive of the policy Unclear how policy will apply to Pevensey due to flood zone 3 location	Comment of support noted. Flooding policies are dealt with Climate Change chapter of the Local Plan and national planning policy is generally not supportive of residential development within Flood Zone 3.	Comments noted. No changes required.
Polegate Parish Council Supportive of the policy. Need to ensure the mix is suitable and definition of small and medium sized housing sites is required.	The Council considers a site area threshold to be an appropriate and widely understood means of identifying small and medium-sized sites for planning purposes, including through the NPPF. The policy is intended to support the delivery of housing on such sites rather than prescribe development capacity.	Comment noted. No changes required.
Rotherfield Parish Council Supportive of the policy. Need to ensure developers don't evade the need to provide affordable housing units on smaller sites.	The Council considers a site area threshold to be an appropriate and widely understood means of identifying small and medium-sized sites for planning purposes, including through the NPPF. The	Comment noted. No changes required.

	policy is intended to support the delivery of housing on such sites rather than prescribe development capacity.	
Uckfield Town Council Supportive of the policy. Would like to see smaller developments with a mix of one-, two- and three-bedroom houses as major developments put pressure on infrastructure. There needs to be more focus on green infrastructure. Small and medium sized housing could trial new types of housing such as self-build/Scandinavian type homes.	Comment of support noted. The policy supports a range of housing site sizes and does not preclude smaller developments from coming forward where they are sustainable and consistent with the spatial strategy. The mix of dwelling sizes and types is addressed through other housing policies, whilst green infrastructure requirements are considered through relevant design, environmental and infrastructure policies.	Comment noted. No changes required.
Withyham Parish Council Supportive of the policy.	Comment of support noted.	Comments of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Supportive of the policy Need for stricter design codes to protect the countryside. Developments should not include market or rentable homes on such sites. Design and sustainability criteria should be strengthened to ensure developments enhance local character. Requirement for clear guidance on integrating developments into existing communities.	The Council considers a site area threshold to be an appropriate and widely understood means of identifying small and medium-sized sites for planning purposes, including through the NPPF. The policy is intended to support the delivery of housing on such sites rather than prescribe development capacity.	Comment noted. No changes required.

Calls for incentives to increase affordable housing provision. Prioritisation of brownfield land to reduce pressure on greenfield sites. Recognition of a growing need for high-quality smaller housing, including innovative options such as eco-friendly or transitional housing (e.g. tiny homes). Policy should support well-designed single-storey homes to meet the needs of elderly and disabled people. Small-scale development in sensitive areas (e.g. AONB) should be carefully and sympathetically designed. Concern that limits on site size (e.g. 1 hectare) may be temporary and subject to change in future plans. Need to prevent clustering of multiple housing estates ('stacking' developments). View that small and medium-sized sites should be prioritised ahead of larger developments. Concern about 'creeping development' resulting from incremental small-scale schemes. Need to demonstrate strong sustainability benefits, particularly in constrained areas such as the AONB. Policy should be locally responsive, reflecting local environmental conditions, infrastructure capacity, and community needs, rather than a top-down approach.	The mix of dwelling sizes and types is addressed through other housing policies, whilst green infrastructure, climate change and landscape requirements are considered through relevant design, environmental and infrastructure policies.	

Other Comments	WDC Response	
None		

Policy H05: Self Build and Custom Housebuilding

WDC Response to the Regulation 18 Consultations

Total: 96	Support: 76	Neutral: 9	Object: 11

Policy HO5: Self and Custom-Build Housebuilding		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
None		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Developers and Agent</u> **Boakes Land Project** Raised an objection to the policy Favours 100% self-build schemes rather than inclusion within a larger scheme Self-build plots are unsuitable on sites under 100 units	• The Regulation 19 policy has been revised and refined to provide a balanced and deliverable mechanism for increasing the supply of self and custom-build plots in response to identified demand, whilst recognising site-specific circumstances and viability considerations.	Comment noted. Criterion 2 has been amended to alter the threshold for on-site provision, which has been increased to residential developments of 70 or more dwellings (gross).

Low demand on large scale development due to design constraints Policy overly restrictive Object to the proposed housing mix for self-build units	• The Council does not agree that provision should be limited solely to 100% self-build or custom-build schemes. National policy and guidance support a range of approaches to increasing self and custom-build opportunities, including the provision of serviced plots within larger residential developments. The Council considers that integrating self and custom-build plots within larger schemes can contribute to housing choice, diversify supply and support the delivery of mixed and balanced communities. • The threshold for on-site provision has been increased to residential developments of 70 or more dwellings (gross). This reflects consideration of deliverability and the practicalities of providing self and custom-build plots as part of larger strategic developments. The policy also includes flexibility where site-specific constraints, viability considerations or evidence of oversupply demonstrate that the requirement would be impracticable or unnecessary. • The Council notes the concern that demand for self and custom-build	

	plots may be limited on larger sites due to design constraints. However, the requirement for design codes and plot passports is intended to provide an appropriate framework for development while allowing individualisation and design flexibility. The Council considers that this approach can successfully accommodate self and custom-build development within larger schemes. • The objection to housing mix requirements is also noted. The policy requires self and custom-build housing to contribute towards identified housing needs and accord with Policies HO1 and HO2. This ensures that self and custom-build development contributes to the delivery of the overall housing objectives of the Local Plan whilst retaining flexibility regarding the detailed design and specification of individual homes.	
Gladman Development Limited Supportive of the policy Emphasise need for flexibility to reflect demand and viability. Requirements should be tested through viability assessments. Unsold plots should revert to market housing.	The Regulation 19 policy has been revised and refined to provide a balanced and deliverable mechanism for increasing the supply of self and custom-build plots in response to identified demand, whilst recognising site-specific	Comment noted. No changes required.

	circumstances and viability considerations. The policy has been considered in the Wealden Viability Study (September 2026) and tested, raising no viability concerns. Criterion 4 confirms that where plots remain unsold following the agreed marketing period and appropriate evidence of active marketing has been provided, the Council may permit the plots to be developed for alternative housing purposes.	
Grosvenor Property UK Limited Supportive of the policy. Seek greater flexibility in thresholds and proportions on a site-specific basis.	The threshold for on-site provision has been increased to residential developments of 70 or more dwellings (gross). This reflects consideration of deliverability and the practicalities of providing self and custom-build plots as part of larger strategic developments. The policy also includes flexibility where site-specific constraints, viability considerations or evidence of oversupply demonstrate that the requirement would be impracticable or unnecessary.	Comment noted. Criterion 2 has been amended to alter the threshold for on-site provision, which has been increased to residential developments of 70 or more dwellings (gross).
Hertfordshire Holdings Raised an objection to the policy.	The Council agrees that the assessment of self and custom-build housing need is a matter for the Council and	Comment noted. No changes required.

Oppose to placing the responsibility on applicant to assessed demand, this should be the Council's role Request standardises s106 clauses Marketing outcomes should be reported on for efficiency	this is informed through the Self and Custom Build Register and other relevant evidence. The policy does not require applicants to assess overall demand but provides flexibility where up-to-date evidence demonstrates that plot provision is no longer justified. The detailed drafting of Section 106 agreements, including the use of standard clauses and monitoring arrangements, is an implementation matter rather than a matter for planning policy. Reporting on the marketing and take-up of self and custom-build plots can be secured, where necessary, through planning obligations.	
Landspeed Raised an objection to the policy.	Comment noted.	Comment noted. No changes required.
Landstorm Group Limited Raised an objection to the policy. Seek more flexibility, permissive approaches reflecting varying demand and locations	The threshold for on-site provision has been increased to residential developments of 70 or more dwellings (gross). This reflects consideration of deliverability and the practicalities of providing self and custom-build plots as part of larger strategic developments. The policy also includes flexibility where site-specific constraints, viability considerations or evidence of	Comment noted. Criterion 2 has been amended to alter the threshold for on-site provision, which has been increased to residential developments of 70 or more dwellings (gross).

	oversupply demonstrate that the requirement would be impracticable or unnecessary.	
South West Strategic Developments Supportive of the policy Highlight viability impacts, suggesting provision is better on large strategic sites. Propose 5–10% requirement in Garden Communities.	Comment of support noted. The threshold for on-site provision has been increased to residential developments of 70 or more dwellings (gross). This reflects consideration of deliverability and the practicalities of providing self and custom-build plots as part of larger strategic developments. The policy also includes flexibility where site-specific constraints, viability considerations or evidence of oversupply demonstrate that the requirement would be impracticable or unnecessary.	Comment of support noted. Criterion 2 has been amended to alter the threshold for on-site provision, which has been increased to residential developments of 70 or more dwellings (gross).
Organisations with specific interests		
Home Builders Federation Raised on objection to the policy Policy is excessive and not evidence-based Blanket approach ignores site-specific deliverability—should include “where feasible”. Self-build provision should be delivered on specific sites. Suggest permissive approach on small edge-of-settlement sites. Recommend 6-month marketing period.	The Council considers that Policy HO5 is supported by the evidence of demand for self and custom-build housing, including the Council's Self-Build and Custom Housebuilding Register, and provides an appropriate mechanism for increasing the supply of serviced plots across the district. The Council does not agree that the policy is excessive or that provision should only be secured through	Comments noted. Criterion 2 has been amended to alter the threshold for on-site provision, which has been increased to residential developments of 70 or more dwellings (gross).

	specific site allocations. National policy encourages local planning authorities to support opportunities for self and custom-build housing, and the Council considers that requiring provision on larger housing developments is an effective and flexible means of helping to meet identified demand. This is supported in the LHNA. The concern regarding site-specific deliverability is noted. The Regulation 19 policy has been revised to include flexibility where up-to-date evidence demonstrates an oversupply of plots relative to need, or where site-specific constraints or viability considerations would make provision impracticable. The Council considers that this provides an appropriate mechanism to address circumstances where delivery may not be feasible without requiring additional wording. The recommendation to reduce the marketing period from 12 months to 6 months has been considered. The Council considers that a 12-month marketing period provides a reasonable opportunity for eligible purchasers to identify and secure plots, particularly given the specialist	

	nature of the self and custom-build market. The policy already provides flexibility for alternative housing uses where plots remain unsold following the agreed marketing period and appropriate evidence of active marketing has been provided.	
Registered Providers **Hailsham Community Land Trust** Supportive of the policy Call for more support to deliver affordable homes in perpetuity	The Council recognises the importance of delivering affordable homes to meet local needs. However, affordable housing provision and its long-term retention are addressed through the Local Plan's affordable housing policies rather than Policy HO5, which relates specifically to self and custom-build housing.	Comment noted. No changes required.
Hastoe Housing Association Object to the requirement being applied to 100% affordable housing schemes	The suggestion that 100% affordable housing schemes should be exempt from the self and custom-build requirement has been considered. However, Policy HO5 already includes flexibility where site-specific constraints or viability considerations demonstrate that provision would be impracticable. The Council considers this provides an appropriate mechanism to assess individual circumstances on a case-	Comment noted. No changes required.

	by-case basis rather than applying a blanket exemption.	
Hyde Housing Supportive of the policy. Built time is often longer with impact on viability on such schemes 100% affordable homes schemes should be exempt	The suggestion that 100% affordable housing schemes should be exempt from the self and custom-build requirement has been considered. However, Policy HO5 already includes flexibility where site-specific constraints or viability considerations demonstrate that provision would be impracticable. The Council considers this provides an appropriate mechanism to assess individual circumstances on a case-by-case basis rather than applying a blanket exemption.	Comment noted. No changes required.
Orbit Homes Demand is insufficient Concern over lack of exemption for 100% affordable schemes and viability impacts due to funding constraints.	The suggestion that 100% affordable housing schemes should be exempt from the self and custom-build requirement has been considered. However, Policy HO5 already includes flexibility where site-specific constraints or viability considerations demonstrate that provision would be impracticable. The Council considers this provides an appropriate mechanism to assess individual circumstances on a case-	Comment noted. No changes required.

	by-case basis rather than applying a blanket exemption.	
Town and Country Housing 100% affordable homes schemes should be exempted	The suggestion that 100% affordable housing schemes should be exempt from the self and custom-build requirement has been considered. However, Policy HO5 already includes flexibility where site-specific constraints or viability considerations demonstrate that provision would be impracticable. The Council considers this provides an appropriate mechanism to assess individual circumstances on a case-by-case basis rather than applying a blanket exemption.	Comment noted. No changes required.
<u>Residents Associations</u> **Dicker Residents Association** Supportive of the policy Suggest lower threshold (below 20 dwellings) as schemes are difficult to manage at higher levels.	The Council notes the preference for a lower threshold for requiring self and custom-build plots. However, the threshold of 70 dwellings has been selected to ensure that the requirement is proportionate and deliverable, whilst avoiding undue impacts on smaller housing schemes.	Comment noted. No changes required.
Village Concerns Supportive of the policy. Suggested threshold of 20 dwellings for requiring self-build plots.	The Council notes the preference for a lower threshold for requiring self and custom-build plots. However, the threshold of 70 dwellings has been	Comment noted. No changes required.

	selected to ensure that the requirement is proportionate and deliverable, whilst avoiding undue impacts on smaller housing schemes.	
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Forest Row Parish Council Supportive of the policy Prefer a much lower threshold (5 units) Prefer a significantly longer marketing period (3 years)	The Council notes the preference for a lower threshold for requiring self and custom-build plots. However, the threshold of 70 dwellings has been selected to ensure that the requirement is proportionate and deliverable, whilst avoiding undue impacts on smaller housing schemes. The suggestion to extend the marketing period to three years has also been considered. The Council considers that the proposed 12-month marketing period strikes an appropriate balance between providing a reasonable opportunity for plots to be purchased for self and custom-build housing and ensuring that housing delivery is not unnecessarily delayed. The policy also allows alternative housing uses where plots remain unsold following active marketing.	Comment noted. No changes required.

Hailsham Town Council Supportive of the policy. Policy should clearly support individual/smaller self-build plots	Comment noted. The policy support individual self and custom-build plots in accordance with other policies in the Plan.	Comment noted. No changes required.
Heathfield and Waldron Parish Council Supportive of the policy. Clarification needed on the start point of the marketing period At para 3 applications should be replace with applications	Comment of support noted. It is impossible to clarify when the marketing period starts for all cases and the assessment of this evidence will ensure that 12 months marketing has been completed and this will be secured through a Section 106 agreement.	Comment noted. No changes required.
Horam Parish Council Raised an objection to the policy. Prefer 18-month marketing period with clarification on start point Request clarity on CIL for reverted plots A design guide/code should be prepared Proposed amendment: "Where serviced plot(s) for self-build and custom-build housing have been sought as part of a strategic allocation within the Local Plan, or on sites of 20 dwellings (gross) or more, those plots must be prominently marketed for sale to self or custom builders for at least 18 months (or a longer period of time if mutually agreed between the two parties), at a reasonable price (this may be independently assessed through the Council) and if not sold, the plot(s) can return to the developer to be constructed as open market	The Council notes the preference for a lower threshold for requiring self and custom-build plots. However, the threshold of 70 dwellings has been selected to ensure that the requirement is proportionate and deliverable, whilst avoiding undue impacts on smaller housing schemes. The suggestion to extend the marketing period to 18 months has also been considered. The Council considers that the proposed 12-month marketing period strikes an appropriate balance between providing a reasonable opportunity for plots to be purchased for self and custom-build housing and ensuring	Comment noted. No changes required.

housing or in line with the terms set in a specific legal agreement"	that housing delivery is not unnecessarily delayed. The policy also allows alternative housing uses where plots remain unsold following active marketing.	
Laughton Parish Council Raised an objection to the policy. Support an 18-month marketing period Concerns about misuse/abuse of policy after permission	The suggestion to extend the marketing period to 18 months has also been considered. The Council considers that the proposed 12-month marketing period strikes an appropriate balance between providing a reasonable opportunity for plots to be purchased for self and custom-build housing and ensuring that housing delivery is not unnecessarily delayed. The policy also allows alternative housing uses where plots remain unsold following active marketing.	Comment noted. No changes required.
Mayfield and Five Ashes Parish Council Supportive of the policy.	Comment of support noted.	Comment of support noted. No changes required.
Pevensey Parish Council Supportive of the policy. Unclear how the policy applies to Pevensey Bay	Comment of support noted. This policy will apply in all parts of the district, albeit this would not be the case for other policies within the Plan.	Comment of support noted. No changes required.
Polegate Town Council Supportive of the policy. Favour 18-month marketing period	The suggestion to extend the marketing period to 18 months has also been considered. The Council considers	Comment noted. No changes required.

Self-build should be genuinely independent Concerns about both low and high thresholds	that the proposed 12-month marketing period strikes an appropriate balance between providing a reasonable opportunity for plots to be purchased for self and custom-build housing and ensuring that housing delivery is not unnecessarily delayed. The policy also allows alternative housing uses where plots remain unsold following active marketing.	
Rotherfield Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Uckfield Town Council Supportive of the policy Oppose fixed threshold and favour case-by-case approach	Comment of support noted. The Council notes the preference for a case-by-case basis for requiring self and custom-build plots. However, the threshold of 70 dwellings has been selected to ensure that the requirement is proportionate and deliverable, whilst avoiding undue impacts on smaller housing schemes.	Comment of support noted. No changes required.
Withyham Parish Council Supportive of the policy. Threshold should be below 20 dwellings Support 12-month marketing period	The Council notes the preference for a lower threshold for requiring self and custom-build plots. However, the threshold of 70 dwellings has been selected to ensure that the requirement is proportionate and deliverable, whilst avoiding undue	Comment of support noted. No changes required.

	impacts on smaller housing schemes. Support for 12 month marketing period is agreed.	
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Self-build seen as diversifying housing choice Self-build demand considered modest (~2%) Policy may be incompatible with affordable housing provision with risk of reducing affordable housing delivery Viability concerns for developers Suggestion to set threshold for provision Need to balance self-build with affordable housing on small sites Marketing period suggestions – shorter than 12 months, support for 12-month, longer Need for flexibility in marketing period Concern about delays to housing delivery from long marketing periods Concern about land-banking if marketing period too long Suggestion unsold plots revert quickly to developer, agricultural land, provide smaller homes Concern that self-build could reduce CIL contributions Suggestion to disband self-build policy entirely Concern that self-build is not achievable for many people View that policy has not worked well nationally Risk of policy misuse and lack of control	The Council notes the comments on the threshold for requiring self and custom-build plots. However, the threshold of 70 dwellings has been selected to ensure that the requirement is proportionate and deliverable, whilst avoiding undue impacts on smaller housing schemes. The suggestion to extend or reduce the marketing period has also been considered. The Council considers that the proposed 12-month marketing period strikes an appropriate balance between providing a reasonable opportunity for plots to be purchased for self and custom-build housing and ensuring that housing delivery is not unnecessarily delayed. The policy also allows alternative housing uses where plots remain unsold following active marketing. Comments in relation viability have been addressed through the Council's	Comments noted. Criterion 2 has been amended to alter the threshold for on-site provision, which has been increased to residential developments of 70 or more dwellings (gross).

Need for clearer policy wording Need for Design Guide/Code Suggestion to support small sites for 100% self-build Suggestion to encourage Community Land Trusts Encourage sustainable construction methods and materials Suggestion to incentivise sustainability in self-build Lack of clarity on fully self-build developments vs large sites Lack of clarity on who can access the self-build register Concern about awareness of the self-build register Questions over the accuracy and age of evidence base Concern about how demand is monitored and evidenced	Wealden Local Plan viability study (September 2026). The management of the self-build and custom build register is a separate process undertaken by the Council.	
Other Comments	**WDC Response**	
None		

Policy HO6: Houses in Multiple Occupancy (HMOs) and Subdivision of Existing Dwellings

WDC Response to the Regulation 18 Consultations

Total: 76	Support: 68	Neutral: 2	Object: 6

Policy HO6: Houses in Multiple Occupancy (HMO) and Subdivision of Existing Dwellings		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
None		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Developers and Agents **Clarity Ecoworks** Supportive of the policy.	Comment of support noted.	Comment of support noted. No changes required.
Landspeed Supportive of the policy.	Comment of support noted.	Comment of support noted. No changes required.
Residents Association **Dicker Residents Association** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Village Concerns Supportive of the policy.	Comment of support noted.	Comment of support noted. No changes required.
Willingdon Residents Association Suggest inspections to identify HMO	Comment noted. Inspections to identify HMOs fall outside the scope of the Local Plan policy.	Comment noted. No changes required.

Rural exceptions sites should be considered to ensure people can afford to purchase homes	Rural exceptions sites are addressed through the Local Plan's policy on this matter.	
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Crowborough Town Council Support provision of smaller, more affordable homes Suggest including bedroom-to-bathroom ratio in HMOs	Comment of support noted. HMO standards are addressed through other mechanisms, such as through our housing team.	Comment of support noted. No changes required.
Forest Row Parish Council Supportive of the policy. Suggest incentive to encourage subdivision of properties	Comment of support noted. Incentives to encourage the subdivision of residential properties falls outside the scope of the Local Plan policy.	Comment of support noted. No changes required.
Heathfield and Waldron Parish Council Supportive of the policy. HMOs should be in sustainable locations, not isolated in the countryside	Comment of support noted. The Council agrees that HMOs should generally be located in accessible and sustainable locations. However, HMOs are a residential use and, where proposals are within development boundaries, the spatial strategy and settlement hierarchy already direct development to the most sustainable locations. The policy focuses on managing the specific impacts of HMOs, while proposals outside development boundaries are subject to wider Local Plan policies that strictly	Comment of support noted. No changes required.

	control residential development in the countryside.	
Horam Parish Council Raised an objection to the policy. Policy should include reference to EV charging Policy should include a district-wide design code/guide	Comment noted. Provision for EV charging is addressed through wider Local Plan policies relating to sustainable transport, parking and infrastructure, and relevant building regulations and national standards where applicable. The purpose of Policy HO6 is to manage the particular planning considerations associated with HMOs and the subdivision of dwellings. The Council has published a district wide design guide as part of the Regulation 19 Local Plan.	Comment noted. No changes required.
Laughton Parish Council Raised an objection to the policy. HMO should be provided within large sites Need to consider accessibility for existing HMO	Comment noted. HMOs can make an important contribution to meeting housing needs across a range of locations and property types. The policy therefore focuses on ensuring that proposals provide a suitable standard of accommodation and do not result in unacceptable impacts on the character of the area or neighbouring amenity. Criterion 1(c) requires HMOs to provide an appropriate standard of	Comment noted. No changes required.

	accommodation for future occupiers, while wider Local Plan policies on design and inclusive access also apply where relevant. It is not considered necessary to include additional accessibility requirements within this policy	
Mayfield and Five Ashes Parish Council Supportive of the policy.	Comment of support noted.	Comment of support noted. No changes required.
Pevensey Parish Council Raised an objection to the policy. HMOs are not a popular choice for accommodation and are poorly maintained Prefer the provision of 1-bed homes instead Suggest replacing policy with subdivision of larger properties	Comment noted. HMOs provide an important source of accommodation for a range of households, including those who may not be able to access other forms of housing. The policy seeks to ensure that HMOs provide an appropriate standard of accommodation and do not result in unacceptable impacts on the character of the area or neighbouring amenity. Maintenance and management matters are addressed through separate regulatory regimes. HMOs and the subdivision of dwellings represent different forms of development and raise distinct planning considerations. The policy therefore includes provisions relating to both HMOs and the subdivision of existing dwellings to ensure that	Comment noted. No changes required.

	each type of proposal is appropriately managed.	
Polegate Town Council Supportive of the policy. Ensure high quality standard for HMOs HMOs should be within development boundaries	Comment of support noted. The Council agrees that HMOs should generally be located in accessible and sustainable locations. However, HMOs are a residential use and, where proposals are within development boundaries, the spatial strategy and settlement hierarchy already direct development to the most sustainable locations. The policy focuses on managing the specific impacts of HMOs, while proposals outside development boundaries are subject to wider Local Plan policies that strictly control residential development in the countryside.	Comment of support noted. No changes required.
Rotherfield Parish Council Supportive of the policy HMOs help meet unmet local housing needs	Comment of support noted.	Comment of support noted. No changes required.
Withyham Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Focus HMOs in larger suburban properties to limit local impacts Need for more HMOs, particularly for single-person households	Comments noted. Provision for EV charging is addressed through wider Local Plan policies relating to sustainable transport, parking and infrastructure, and	Comments noted. No changes required.

Lack of clear definition of “larger residential dwellings” Need for strong controls and safeguards on HMOs Support for HMOs due to undersupply of one-bedroom homes Growing need for high-quality small housing Policy should include EV charging requirements Policy should include a district-wide design guide/code Concern HMOs are out of character in rural villages Perception that HMOs are often poorly maintained and undesirable	relevant building regulations and national standards where applicable. The purpose of Policy HO6 is to manage the particular planning considerations associated with HMOs and the subdivision of dwellings. The Council has published a district wide design guide as part of the Regulation 19 Local Plan. The Council agrees that HMOs should generally be located in accessible and sustainable locations. However, HMOs are a residential use and, where proposals are within development boundaries, the spatial strategy and settlement hierarchy already direct development to the most sustainable locations. The policy focuses on managing the specific impacts of HMOs, while proposals outside development boundaries are subject to wider Local Plan policies that strictly control residential development in the countryside.	
Other Comments	**WDC Response**	
None		

Policy HO7: Rural Exception Sites to Meet Local Housing Need

WDC Response to the Regulation 18 Consultations

Total: 102	Support: 89	Neutral: 4	Object: 9

Policy HO7: Rural Exception Sites to Meet Local Housing Need		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
National Highways Supportive of the policy Add reference to designing communities in accordance with Manual for Streets and Local Transport Note 1/20 Should be consulted on the housing site allocations	• Comments of support noted. • The Council recognises the importance of creating well-designed, accessible and connected communities. However, these matters are addressed through the wider design, active travel and transport policies within the Local Plan, alongside relevant national guidance. It is not considered necessary to refer to specific guidance documents within this policy. • Consultation on housing site allocations has been undertaken as part of the Local Plan preparation process and statutory consultation requirements.	Comment of supported noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**

None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Developers and Agents **Boakes Land Projects** Supportive of the draft policy.	• Comments of support noted.	Comment of supported noted. No changes required.
Neville Estate Company Raised an objection to the policy. Affordable housing cannot be delivered in isolation Strongly support bringing land forward adjoining existing rural settlement to deliver affordable homes to support smaller village settlements and rural communities Council assets should be delivered affordable homes.	National policy specifically supports the use of rural exception sites to deliver affordable housing where there is an identified local need that would not otherwise be met. The policy allows for limited market housing where robust viability evidence demonstrates that it is necessary to facilitate the delivery of the affordable housing scheme. The policy is intended to facilitate the delivery of affordable housing on suitable sites within or adjoining settlements where a local housing need has been identified, helping to support the long-term sustainability of rural communities. The use of Council assets falls outside the scope of planning policy.	Comment noted. No changes required.
Organisations with specific interests **Action in Rural Sussex** Supportive of the policy.	• Comments of support noted. • National policy specifically supports the use of rural exception sites to deliver affordable housing where there is an identified local need that	Comment of supported noted. No changes required.

Inclusion of market housing should not lead to higher values or expectation by landowners	would not otherwise be met. The policy allows for limited market housing where robust viability evidence demonstrates that it is necessary to facilitate the delivery of the affordable housing scheme.	
English Rural Housing Association Supportive of the policy. Any financial appraisal to demonstrate the need for market housing will be submitted as part of the applicant's evidence base. The term 'independent' should be deleted from the text. It is unreasonable to restrict the policy to settlements defined in the settlement hierarchy. Additional flexibility should be considered for criterion 2a) to allow for a range of sources to be used as evidence of need. Criterion 2c) should be amended to allow more flexibility in the assessment at the time of the application. Criterion 2d) is unnecessary as the Plan should be read as a whole. Supportive of the recognition that market housing may be needed to make schemes viable.	The Council welcomes support for the policy and the recognition that allowing a proportion of market housing may be necessary to support the viability and delivery of schemes. The policy already provides flexibility for applicants to submit evidence demonstrating viability and local housing needs as part of the planning application process. The Council considers it appropriate to retain reference to an independent assessment where required to ensure that evidence submitted in support of proposals can be robustly verified. Restricting the policy to settlements identified within the settlement hierarchy is consistent with the spatial strategy and ensures that development is directed to the most sustainable locations. The Council also considers that the existing wording of criteria 2a) and 2c) provides sufficient flexibility to	Comment of supported noted. No changes required.

	consider relevant and up-to-date evidence on a case-by-case basis.	
Residents Association **Dicker Residents Association** Supportive of the policy. Affordable needs to be reviewed in line with increase in living costs. Local should be a narrow definition as commuting and journey to work distances have increased.	Comments of support noted. The Council recognises concerns regarding housing affordability and the impact of rising living costs. However, the definition and assessment of affordable housing need are informed by national policy and the Council's evidence base, which are regularly reviewed and updated as required. The policy seeks to ensure that affordable housing delivered through the policy meets identified local needs while remaining consistent with the relevant housing needs evidence and any local connection criteria applied by the Council. The existing approach provides an appropriate balance between addressing local housing needs and reflecting modern travel-to-work patterns.	Comment of supported noted. No changes required.
The Working Group Against Over Development Supportive of the policy. Insert "affordable" in the first sentence of para 2b) before 'housing need'.	Comments of support noted. The Council believes that the wording of the Regulation 19 policy is sufficiently clear on this issue.	Comment of supported noted. No changes required.

Village Concerns Supportive of the policy	• Comments of support noted.	Comment of supported noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Arlington Parish Council Supportive of the policy. Affordable housing should be genuinely affordable for local young people	Comments of support noted.	Comment of supported noted. No changes required.
Chiddingly Parish Council Supportive of the policy. Policy should refer to small-scale development meeting local needs Affordable housing should remain affordable in perpetuity Cycle and pedestrian access should be addressed	Criterion 1(c) already requires development to be of an appropriate scale and to relate well to the form and character of the settlement. It is therefore considered that the policy sufficiently addresses this matter. Criterion 2 requires affordable housing delivered through rural exception sites to be secured through a planning obligation or other appropriate legal mechanism to ensure that it remains available to meet local housing needs in perpetuity. The Council recognises the importance of providing safe and sustainable travel choices. Criterion 1(d) requires sites to be accessible to local services, facilities and public transport, or to provide suitable and safe connections to them.	Comment of supported noted. No changes required.
Forest Row Parish Council Supportive of the policy.	Comments of support noted.	Comment of supported noted. No changes required.

Rural exception sites could help villages where only small parcels of land are available		
Heathfield and Waldron Parish Council Supportive of the policy. Questions need for cycle access requirement Requests clarification of First Homes requirement	Comments of support noted. Criterion 1(d) seeks to ensure that rural exception sites are accessible to local services and facilities and support opportunities for sustainable travel where appropriate. The policy does not require specific cycle infrastructure in all cases, but allows for consideration of site-specific circumstances. It is therefore considered that the policy strikes an appropriate balance between accessibility and flexibility. The provision of First Homes will be considered in accordance with national policy and the Council's affordable housing policies in force at the time an application is determined. As Policy HO7 relates to the delivery of affordable housing to meet identified local needs, it is not considered necessary to include specific references to First Homes within this policy.	Comment of supported noted. No changes required.
Laughton Parish Council Supportive of the policy. Rural exception sites should provide only social/affordable rented housing Opposes market housing on exception sites	Comments of support noted. Policy HO7 seeks to facilitate the delivery of affordable housing to meet identified local needs and does not prescribe specific affordable	Comments of supported noted. No changes required.

Concern about misuse of policy through market housing provision Concern about loss of agricultural occupancy dwellings	housing tenures. The appropriate tenure mix will be informed by local housing needs evidence and relevant affordable housing policies. National policy allows for market housing on rural exception sites where it is necessary to facilitate the delivery of affordable housing. Criterion 3 of the policy strictly limits market housing to circumstances where robust viability evidence demonstrates that it is essential, requires it to be the minimum necessary, and ensures that it remains subordinate to the affordable housing provision. The policy includes clear safeguards requiring applicants to demonstrate through robust viability evidence that market housing is essential to deliver the affordable housing scheme. The Council may also require independent review of viability assessments to ensure that any market housing provision is appropriately justified and limited. Agricultural occupancy policy is dealt with elsewhere within the Local Plan.	
Mayfield and Five Ashes Parish Council Supportive of the policy	Comments of support noted. Policy HO7 is intended to provide a flexible framework for the delivery of	Comment of supported noted. No changes required.

Recognise need for affordable housing in rural areas Concern that some settlements may not have resources to meet policy requirements	rural exception sites and does not require all settlements to accommodate such development. Proposals will be assessed on their individual merits, taking account of the scale of the settlement, identified local housing needs, and the availability and accessibility of local services and facilities. The policy is designed to ensure that development is proportionate and appropriate to its location.	
Polegate Town Council Supportive of the policy. Affordable housing need and affordability should be demonstrated Development outside settlement boundaries should be restricted to rented housing	Comments of support noted. The policy includes clear safeguards requiring applicants to demonstrate through robust viability evidence that market housing is essential to deliver the affordable housing scheme. The Council may also require independent review of viability assessments to ensure that any market housing provision is appropriately justified and limited. The Council does not consider it appropriate to restrict development outside settlement boundaries solely to affordable rented housing. Rural exception sites can help meet identified local affordable housing needs through a range of affordable tenures, reflecting the varied housing	Comment of supported noted. No changes required.

	requirements of different households and helping to create balanced and sustainable communities. National policy also supports a range of affordable housing products where these meet identified needs.	
Rotherfield Parish Council Supportive of the policy. Welcome provision for rural workers and older residents Note implications for the planning authority and parish council	Comments of support noted.	Comment of supported noted. No changes required.
Uckfield Town Council Supportive of the policy. Rural character of exception sites should be protected	Comments of support noted. Criterion 1(c) already requires development to be of an appropriate scale, design and layout, relate well to the form and character of the settlement, and integrate successfully with its surroundings. In addition, wider design and landscape policies within the Local Plan will apply. It is therefore considered that the policy provides appropriate safeguards for rural character.	Comment of supported noted. No changes required.
Withyham Parish Council Supportive of the policy.	Comments of support noted.	Comment of supported noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Affordable housing should be genuinely affordable, including social housing.	Comments noted	Comments noted. No changes required.

Rural exception sites should meet a clearly evidenced local housing need. Imperative/local need should be the overriding consideration. Rural exception sites should support smaller homes and affordable homes for local people. Settlements with limited or no planned growth should also be eligible for rural exception sites. Rural exception sites can support smaller villages and rural communities. A priority system should be established for future occupiers. Occupancy should prioritise very local needs (e.g. within a 3-mile radius). Sites should be considered in conjunction with Neighbourhood Plans. The policy should be applied consistently to proposed site allocations. Adequate cycle path provision should be considered. An up-to-date district-wide Design Guide/Design Code is required. Concern that requiring a higher proportion of affordable housing may be unreasonable. Use of Council-owned land/assets should be explored for affordable/social housing delivery. Support for meeting local village and agricultural worker housing needs. Commitment to maintaining agricultural occupancy ties should be strengthened. Objection to development in rural locations.	The definition and assessment of affordable housing need are informed by national policy and the Council's evidence base, which are regularly reviewed and updated as required. National policy specifically supports the use of rural exception sites to deliver affordable housing where there is an identified local need that would not otherwise be met. The policy allows for limited market housing where robust viability evidence demonstrates that it is necessary to facilitate the delivery of the affordable housing scheme. Criterion 1(d) seeks to ensure that rural exception sites are accessible to local services and facilities and support opportunities for sustainable travel where appropriate. The policy does not require specific cycle infrastructure in all cases but allows for consideration of site-specific circumstances. It is therefore considered that the policy strikes an appropriate balance between accessibility and flexibility. Agricultural occupancy policy is dealt with elsewhere within the Local Plan. A design guide has been published on a district wide basis.	

Objection to building outside development boundaries. Concern that there is no current local housing need in some areas. Concern that exception sites could be used to expand development boundaries unnecessarily. Concern that affordable housing schemes cannot be delivered in isolation and may require some market housing. Policy may be inconsistent with national policy by restricting rural exception sites to certain settlement types. Clause 3 may discourage delivery of schemes. Unclear why affordable housing would be acceptable where market housing is not. Concern that rural exception sites could result in poorly designed development. General objection to the policy without detailed reasoning. Concerns regarding justification for additional rural development.	Restricting the policy to settlements identified within the settlement hierarchy is consistent with the spatial strategy and ensures that development is directed to the most sustainable locations, or adjacent/close proximity to them.	
Other Comments	**WDC Response**	
None		

Policy HO8: Affordable Housing

WDC Response to the Regulation 18 Consultations

Total: 139	Support: 43	Object: 61	Neutral: 35

Regulation 18 Draft Local Plan Consultation

Policy HO8: Affordable Housing		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
NHS Property Services Supportive of the policy. Affordable homes should be set aside/prioritised for essential local workers. Should consider site selection and allocation to identify need for affordable homes for NHS staff.	• Comment of support noted. • The Council recognises the importance of affordable housing for key workers, including NHS staff and other essential local workers. However, affordable housing delivered through Policy HO8 is intended to meet a broad range of identified housing needs across the district, in accordance with the Council's housing evidence and allocation policies that sits outside the planning policy process. • The Council does not consider it appropriate for this policy to prioritise specific occupational groups, as this could limit the ability to address wider affordable housing needs and may not align with national policy or housing allocation	Comment of support noted. No changes required.

	frameworks. The identification of housing needs, including the needs of key workers, is considered through the Local Plan evidence base and informs the overall affordable housing requirement.	
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Developers and Agents</u> **Aldi Stores Limited** Welcome clarification in criterion 1	• Comments of support noted.	Comment of support noted. No changes required.
B Yond Homes Limited First Homes discount should not exceed 30% Proposed tenure mix is too prescriptive Maximum First Homes value should be £250,000	The Council welcomes support for the inclusion of First Homes within the policy. The requirement for a minimum 30% discount reflects national policy and the Council does not consider a higher mandatory discount necessary. The Council also notes the suggestion that the maximum First Homes value should be £250,000; however, sale price caps are established through national policy and any relevant national guidance, and do not need to be repeated within the Local Plan. The Council acknowledges concerns regarding the prescribed tenure mix. However, the tenure split is based on	Comment noted. No changes required.

	the Council's most up-to-date evidence of housing need and seeks to ensure that affordable housing provision addresses identified local requirements, particularly the significant need for social rented housing. The policy already provides flexibility by allowing an alternative tenure mix where justified by the Council's latest evidence.	
Boakes Land Projects The overprovision of affordable homes should be supported by the policy with a similar approach to developer contributions. Higher First Homes discounts may create viability issues First Homes price caps and income caps should vary by property size Flexibility needed on affordable housing cluster sizes	The Council supports the delivery of affordable housing above policy requirements where this can be achieved and notes that proposals delivering higher levels of affordable housing may provide additional public benefits. However, it is not considered necessary to include a specific policy mechanism comparable to that used for developer contributions, as applications proposing an overprovision of affordable housing can already be assessed positively on their merits. The Council acknowledges concerns regarding the impact of higher First Homes discounts on scheme viability. Policy HO8 requires a minimum 30% discount, consistent	Comment noted. No changes required.

	with national policy, and does not require higher discounts. The Council notes the suggestion that First Homes price and income caps should vary by property size. These matters are established through national policy and guidance and may change over time. The Council therefore considers it inappropriate to duplicate or supplement national requirements within the Local Plan. Policy HO8 already requires affordable housing to be tenure integrated and distributed throughout developments, rather than concentrated in large clusters, and this approach is considered sufficiently flexible.	
Fernham Homes Limited **Obsidian Strategic Asset Management Limited** **Earlswood Homes Holdings Limited** **Stonebond Properties (Sevenoaks) Limited &** **Akehurst Homes Limited** **Fernham Homes (Sussex) Limited** **Bellway Strategic** **Tarn (Morning Mill) Limited** Housing needs and tenure requirements change over time First Homes requirement is not mandatory nationally	Comments noted Policy HO8 links the tenure mix to the Council's most up-to-date evidence of housing need and allows an alternative mix where justified by that evidence, providing flexibility to respond to changing circumstances. The inclusion of First Homes within the policy reflects the current national policy framework and local evidence and seeks to ensure that a range of affordable home ownership	Comment noted. No changes required.

First Homes may reduce provision of shared ownership and rented homes	opportunities are available alongside rented affordable housing products. The proposed tenure mix has been informed by the Council's housing needs evidence and seeks to strike an appropriate balance between different affordable housing tenures while prioritising the significant identified need for social rented and affordable rented housing.	
Care UK Suggested wording to define 'self-contained use class C2 development': "*Self-contained units including extra-care dwellings. They do not include Use Class C2 care homes, which are exempt from the affordable housing requirements*	Comment noted. Policy HO8 distinguishes between different forms of specialist and older persons' accommodation through its supporting text and the application of relevant planning use classes. The treatment of extra care housing, self-contained accommodation and care homes will be considered on a case-by-case basis having regard to the characteristics of the proposal, national policy and relevant Local Plan policies. It is not considered necessary to include the proposed definition within the policy wording.	Comment noted. No changes required.
Gladman Developments Limited Supports flexible approach in policy	Comment of support noted. The requirement for First Homes reflects national policy and forms part of the wider affordable housing tenure mix.	Comment noted. No changes required.

Policy limits provision of other intermediate housing products because of First Homes requirement	The revised Policy HO8 is intended to support the delivery of a range of affordable housing products to meet identified needs, and the precise tenure mix will be considered having regard to local housing needs evidence, viability considerations and national policy requirements. It is not considered that the policy unduly restricts the provision of other intermediate housing products.	
Grosvenor Property UK Limited More flexibility needed where affordable housing targets are unviable Greater flexibility needed in tenure mix requirements	Comment noted. Policy HO8 already provides a framework for considering viability evidence where applicants demonstrate that policy requirements cannot reasonably be met. This approach seeks to balance the delivery of affordable housing with development viability. Policy HO8 seeks to secure an affordable housing tenure mix that reflects identified housing needs and national policy requirements. The policy allows the Council to consider site-specific circumstances, local evidence and viability considerations when determining the appropriate tenure mix. It is therefore considered	Comment noted. No changes required.

	that sufficient flexibility is already provided	
Hertfordshire Holdings Affordable housing is both a national and local issue Policy should remain flexible following changes in national policy	Comment noted. Policy HO8 already provides a framework for considering viability evidence where applicants demonstrate that policy requirements cannot reasonably be met. This approach seeks to balance the delivery of affordable housing with development viability.	Comment noted. No changes required.
Landspeed First Homes reduce choice of affordable tenures First Homes should be allocated according to need Cluster size, tenure and mix should reflect site circumstances	Comment noted. The Council acknowledges concerns that the inclusion of First Homes could reduce the proportion of other affordable housing tenures available on a development. However, the tenure mix set out in Policy HO8 has been informed by the Council's evidence of housing need and seeks to provide a balanced range of affordable housing products, including social rent, affordable rent and affordable home ownership opportunities. Policy HO8 seeks to secure an affordable housing tenure mix that reflects identified housing needs and national policy requirements. The policy allows the Council to consider	Comment noted. No changes required.

	site-specific circumstances, local evidence and viability considerations when determining the appropriate tenure mix. It is therefore considered that sufficient flexibility is already provided	
Neville Estate Company Objects to the proposed threshold within the High Weald National Landscape due to the impact of development viability.	Comment noted. The threshold proposed within the High Weald National Landscape reflects the area's sensitive landscape character and the need to secure affordable housing contributions from development in a manner that supports the objectives of the Local Plan. The Council's viability evidence has informed the proposed approach, including consideration of viability matters. The policy also provides mechanisms to consider site-specific viability evidence where it can be robustly demonstrated that policy requirements would make development unviable.	Comment noted. No changes required.
Persimmon Homes South East Concerns about First Homes housing mix requirements Affordable housing distribution should balance Registered Provider needs Exceptional circumstances provisions should be reviewed	Comment noted. The Council acknowledges concerns that the inclusion of First Homes could reduce the proportion of other affordable housing tenures available on a development. However, the tenure mix set out in Policy HO8 has	Comment noted. No changes required.

	been informed by the Council's evidence of housing need and seeks to provide a balanced range of affordable housing products, including social rent, affordable rent and affordable home ownership opportunities. Policy HO8 seeks to secure an affordable housing tenure mix that reflects identified housing needs and national policy requirements. The policy allows the Council to consider site-specific circumstances, local evidence and viability considerations when determining the appropriate tenure mix. It is therefore considered that sufficient flexibility is already provided	
Real Select Ltd Viability assessment is critical to determining affordable housing levels Higher First Homes discounts may reduce delivery Property price caps will affect size of homes delivered Income cap should be as high as possible Affordable housing cluster sizes should be site-specific, with 5–15 units often most effective	Requirements relating to First Homes discounts are established through national policy. The policy seeks to support the delivery of affordable housing in accordance with national requirements whilst taking account of local housing needs and viability considerations. Property price caps for First Homes are set through national policy and are intended to ensure homes remain affordable to eligible households. The size and mix of homes delivered	Comment noted. No changes required.

	will continue to be informed by identified housing needs, site-specific circumstances and policy requirements. Eligibility criteria, including income caps for First Homes, are prescribed through national policy. The Council recognises the importance of a flexible and site-responsive approach to affordable housing layout and design. Policy HO8 does not prescribe specific affordable housing cluster sizes, allowing schemes to respond to site characteristics, design considerations and management requirements whilst achieving an appropriate integration of affordable and market housing.	
Reinar Properties Limited Supportive of the policy and its flexibility	Comments of support noted.	Comment of support noted. No changes required.
Sigma Strategic Land Supportive of the policy and its flexibility Policy should reflect circumstances with the requirement may differ	Policy HO8 seeks to secure an affordable housing tenure mix that reflects identified housing needs and national policy requirements. The policy allows the Council to consider site-specific circumstances, local evidence and viability considerations when determining the appropriate tenure mix. It is therefore considered	Comment of support noted. No changes required.

	that sufficient flexibility is already provided	
South West Strategic Developments Supportive of the policy Criterion 3 should actively encourage higher levels of affordable housing provision	The Council supports the delivery of affordable housing wherever appropriate and viable. Policy HO8 is intended to secure affordable housing provision that meets identified needs while ensuring development remains deliverable. The policy does not prevent the provision of affordable housing above the minimum requirements and proposals delivering higher levels of affordable housing will be supported where they are consistent with other policy objectives and site-specific considerations. It is not considered necessary to amend the policy to include an explicit encouragement for overprovision.	Comment of support noted. No changes required.
Taylor Wimpey UK Ltd Increased affordable housing requirements may affect viability Further viability testing is required First Homes requirements can reduce viability and overall affordable housing delivery The maximum sale value of First Homes should be applied to ensure the required level of provision remains deliverable across all sites and contributes to the range of tenure available.	Comment noted. The Council considers that the evidence base provides an appropriate assessment of viability to support the policy. In addition, the policy allows for site-specific viability evidence to be submitted where applicants consider that policy requirements cannot reasonably be met.	Comment noted. No changes required.

Income caps should maximise accessibility. Definition of small affordable housing clusters should be clarified and flexible.	The sale price and eligibility requirements for First Homes are set through national policy and guidance. The Local Plan policy seeks to operate within that framework while delivering an appropriate mix of affordable housing. Eligibility criteria, including income caps for First Homes, are prescribed through national policy. The Council recognises the importance of a flexible and site-responsive approach to affordable housing layout and design. Policy HO8 does not prescribe specific affordable housing cluster sizes, allowing schemes to respond to site characteristics, design considerations and management requirements whilst achieving an appropriate integration of affordable and market housing.	
Vistry Group Supportive of the policy	Comments of support noted.	Comment of support noted. No changes required.
Wates Development Supportive of the policy First Homes requirement restricts provision of other affordable ownership products Affordable ownership proportions should be increased and rented reduced Proposed First Homes price cap conflicts with Policy HO1	Comments of support noted. The Council acknowledges concerns that the inclusion of First Homes could reduce the proportion of other affordable housing tenures available on a development. However, the tenure mix set out in Policy HO8 has been informed by the Council's	Comment of support noted. No changes required.

Very small affordable housing clusters can create management difficulties Affordable housing clustering should focus on rented housing provision only	evidence of housing need and seeks to provide a balanced range of affordable housing products, including social rent, affordable rent and affordable home ownership opportunities. The Council does not support increasing the proportion of affordable home ownership housing at the expense of rented affordable housing. Evidence indicates a significant need for social rented and affordable rented homes within the district, and the proposed tenure mix has been established to respond to that identified need and is proven to be viable. The policy should be read as a whole, and the operation of First Homes is subject to national policy and guidance. The Council is satisfied that there is no conflict that would warrant amendment to Policy HO8. The policy seeks an appropriate balance by requiring affordable housing to be distributed and tenure integrated throughout developments, whilst allowing site-specific design and management considerations to be taken into account. The Council does not support restricting clustering considerations solely to rented affordable housing, as the objective	

	of the policy is to create mixed and balanced communities across all affordable housing tenures.	
Organisations with specific interest **Action in Rural Sussex** Affordable housing delivery should be increased without compromising quality, affordability or sustainability Stronger policy support needed for Community Land Trusts (CLTs) and community-led housing	Comment noted. The Council recognises the valuable contribution that Community Land Trusts and other forms of community-led housing can make to meeting local housing needs and delivering affordable homes. However, Policy HO8 applies to affordable housing provision generally and is intended to provide a consistent framework regardless of the delivery mechanism. Community-led housing proposals can come forward under the policy where they comply with its requirements and other relevant Local Plan policies.	Comment noted. No changes required.
CPRE Sussex Supportive of the policy Support higher affordable housing requirements Council should learn from other authorities to improve access to affordable housing	Comment of support noted. The affordable housing requirement has been informed by evidence of local housing need, development viability and national policy, and seeks to maximise the delivery of affordable homes across the district, without jeopardising viability.	Comment of support noted. No changes required.

Homes Builders Federation Supports continuation of current affordable housing approach Questions whether viability assumptions are realistic Supports flexibility but believes exceptional circumstances may be common Policy should clarify when affordable housing requirements may be amended Concerns about Registered Providers' ability to take on affordable housing stock Flexibility should allow tenure changes or market housing where affordable provision is not feasible	Comment of support noted. The affordable housing requirements set out in Policy HO8 have been informed by the Council's viability evidence, which has tested a range of development typologies and market circumstances. The policy also provides a mechanism for applicants to submit site-specific viability evidence where it can be demonstrated that policy requirements would affect development deliverability. The Council recognises that the availability and requirements of Registered Providers (RPs) can influence the delivery of affordable housing. However, RP interest varies over time and between locations. The policy provides a framework for securing affordable housing, with detailed delivery arrangements to be addressed through the development management process. Policy HO8 already provides flexibility where robust evidence demonstrates that policy requirements cannot reasonably be achieved. Any proposed amendments to tenure mix or affordable housing provision will be assessed having regard to identified housing needs, viability	Comment of support noted. No changes required.

	evidence and relevant policy objectives.	
<u>Registered Providers</u> **Hailsham Community Land Trust** Policy should be more ambitious on affordable housing delivery Greater support needed for a wider range of housing providers Policy HO1 should be reviewed to better meet local needs	Comment noted. The Council recognises the importance of maximising affordable housing delivery to help address identified housing needs across the district. Policy HO8 has been informed by evidence of housing need and viability and seeks to secure a level of affordable housing that is both ambitious and deliverable. Policy HO8 already supports delivery through a variety of mechanisms, including registered providers, Community Land Trusts, co-housing schemes, almshouses and other forms of community-led housing, helping to diversify supply and delivery models. Commet on Policy HO1 is dealt with elsewhere in this Consultation Statement.	Comment noted. No changes required.
Hastoe Housing Association First Homes may reduce overall affordable housing provision Mixed affordable rented tenures on the same scheme should be avoided	The Council acknowledges concerns that the inclusion of First Homes could reduce the proportion of other affordable housing tenures available on a development. However, the tenure mix set out in Policy HO8 has been informed by the Council's	Comment noted. No changes required.

	evidence of housing need and seeks to provide a balanced range of affordable housing products, including social rent, affordable rent and affordable home ownership opportunities. A mix of affordable housing tenures can help meet a wider range of identified housing needs and support the creation of balanced and inclusive communities. The appropriate tenure mix will be determined having regard to local housing needs, site-specific circumstances, management considerations and engagement with affordable housing providers. The Council does not consider it appropriate to prevent different affordable rented tenures from being delivered within the same development.	
Hyde Housing First Homes requirement could adversely affect housing waiting lists Supports proposed affordable housing target	Comment of support noted. The Council acknowledges concerns that the inclusion of First Homes could reduce the proportion of other affordable housing tenures available on a development. However, the tenure mix set out in Policy HO8 has been informed by the Council's evidence of housing need and seeks to provide a balanced range of	Comment of support noted. No changes required.

	affordable housing products, including social rent, affordable rent and affordable home ownership opportunities.	
Orbit Homes Not supportive of multiple tenure on one site First Homes reduce Housing Association interest in Section 106 units	A mix of affordable housing tenures can help meet a wider range of identified housing needs and support the creation of balanced and inclusive communities. The appropriate tenure mix will be determined having regard to local housing needs, site-specific circumstances, management considerations and engagement with affordable housing providers. The Council does not consider it appropriate to prevent different affordable rented tenures from being delivered within the same development. The Council acknowledges concerns that the inclusion of First Homes within the affordable home ownership tenure mix may affect the attractiveness of Section 106 affordable housing packages to some Registered Providers and Housing Associations. However, First Homes form part of the range of affordable home ownership products recognised within the national policy framework and are intended to widen	Comment noted. No changes required.

	opportunities for eligible households to access home ownership.	
Town & Country Housing Affordable rent should be reduced in lieu of Social rent.	Comment noted. Social Rent and Affordable Rent are both important affordable housing tenures that meet different housing needs and funding arrangements. The tenure mix sought through Policy HO8 is informed by evidence of local housing need and discussions with registered providers and other stakeholders. The Council considers that retaining flexibility to secure an appropriate balance of affordable housing tenures is important to maximise delivery and respond to site-specific circumstances.	Comment noted. No changes required.
Residents Association **Dicker Residents Association** Supportive of the policy Requirements should be consistent across Low Weald and High Weald	Comment of support noted. The differing affordable housing requirements reflect the distinct characteristics, constraints and development economics of different parts of the district, informed by the Council's housing and viability evidence. The High Weald National Landscape is subject to particular planning considerations, and policy seeks to ensure that affordable housing requirements remain both effective and deliverable in different	Comment of support noted. No changes required.

	locations. The Council therefore considers that a differentiated approach is justified and appropriate.	
Rotherfield Protection Group Supportive of the policy although affordable homes should be though on 5 and more dwellings developments.	Comment of support noted. The differing affordable housing requirements reflect the distinct characteristics, constraints and development economics of different parts of the district, informed by the Council's housing and viability evidence. The High Weald National Landscape is subject to particular planning considerations, and policy seeks to ensure that affordable housing requirements remain both effective and deliverable in different locations. The Council therefore considers that a differentiated approach is justified and appropriate.	Comment of support noted. No changes required.
The Working Group Against Over Development Supportive of the policy Support higher affordable housing requirements Council should learn from other authorities to improve access to affordable housing	Comment of support noted. The affordable housing requirement has been informed by evidence of local housing need, development viability and national policy, and seeks to maximise the delivery of affordable homes across the district, without jeopardising viability.	Comment of support noted. No changes required.

Village Concerns Contest the proposal for exceptional circumstances	Comment noted. The provision for exceptional circumstances is intended to provide a proportionate degree of flexibility where applicants can robustly demonstrate that site-specific constraints or viability considerations prevent full compliance with the policy requirements. This approach is consistent with national policy and helps to ensure that development remains deliverable whilst maximising affordable housing provision wherever possible. The Council considers that retaining this flexibility is justified and necessary.	Comment noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Chiddingly Parish Council Supportive of the policy. Affordable housing requirement should increase to 40% with a 6 unit threshold	Comment noted. The proposed requirement of 35% affordable housing and the relevant site size thresholds have been informed by the Council's evidence on housing need, development viability and deliverability. The policy seeks to secure the maximum reasonable amount of affordable housing while ensuring that development remains viable and can come forward during the plan period. In addition, national policy	Comment noted. No changes required.

	establishes the circumstances in which affordable housing contributions may be sought from smaller sites.	
East Hoathly with Halland Parish Council Limited reference to Community Land Trusts Insufficient confidence that enough affordable homes will be delivered 40% of affordable housing should be First Homes with a minimum 40% discount Maximum £200,000 price should apply to a 3-bedroom property Affordable housing cluster size should depend on location	Policy HO8 is intended to provide a framework for affordable housing delivery irrespective of the delivery model. Community Land Trust-led schemes are supported where they accord with the requirements of the Local Plan and other relevant policies. The Council considers that the policy provides an appropriate and robust framework for securing affordable housing whilst maintaining development viability and deliverability. The proportion of First Homes and the minimum discount to be applied are determined through national policy and guidance. Policy HO8 has been drafted to operate within that national framework whilst ensuring that the wider affordable housing tenure mix reflects local housing needs. Sale price caps and eligibility criteria for First Homes are established through national policy and are not matters	Comment noted. No changes required.

	that are intended to be set through Policy HO8. Policy HO8 does not prescribe fixed cluster sizes, allowing the layout and clustering of affordable housing to respond to factors such as site characteristics, location, design considerations, management requirements and the need to create mixed and balanced communities.	
Forest Row Parish Council Supportive of the policy. Higher affordable housing requirement needed in the short term to address acute need Questions whether First Homes can be delivered at proposed prices Lower income cap should apply to First Homes Different housing types and sizes should be mixed together	Comment of support noted. The Council considers that the policy provides an appropriate and robust framework for securing affordable housing whilst maintaining development viability and deliverability. Eligibility criteria, including income caps for First Homes, are established through national policy and guidance. It is not considered appropriate for Policy HO8 to introduce locally specific income thresholds. Policy HO8, alongside other housing and design policies in the Local Plan, supports a varied housing mix informed by identified local needs and site-specific circumstances. The Council considers that the policy	Comments of support noted. No changes required.

	already provides sufficient flexibility to achieve this objective.	
Heathfield & Waldron Parish Council Supportive of the policy. Questions whether proposed First Homes price cap and income cap are correct Affordable housing design should be considered on a site-by-site basis	Comment of support noted. Eligibility criteria, including income caps for First Homes, are established through national policy and guidance. It is not considered appropriate for Policy HO8 to introduce locally specific income thresholds. Policy HO8, alongside other housing and design policies in the Local Plan, supports a varied housing mix informed by identified local needs and site-specific circumstances. The Council considers that the policy already provides sufficient flexibility to achieve this objective.	Comments of support noted. No changes required.
Hailsham Town Council Supportive of the policy. More alternative housing products should be encouraged Policy should be more ambitious Further review of Policy HO1 is needed Over-reliance on private developers and volume housebuilders Affordable housing delivery has consistently fallen below target levels	Comment of support noted. Policy HO8 supports the delivery of a range of affordable housing tenures and products, with the appropriate mix informed by evidence of local housing need, national policy and site-specific considerations. The Council considers that the policy already provides sufficient flexibility to accommodate alternative housing products where appropriate.	Comments of support noted. No changes required.

	Policy HO8 has been informed by evidence relating to housing need, affordability, viability and deliverability, and seeks to maximise affordable housing provision whilst ensuring development remains capable of being delivered. The Council considers that the policy strikes an appropriate balance between ambition and deliverability. Comment on Policy HO1 is dealt with elsewhere in this Consultation Statement. The delivery of affordable housing relies on a range of sectors and delivery models, including private developers, registered providers and community-led organisations. Policy HO8 provides a framework to secure affordable housing from qualifying developments regardless of the delivery mechanism.	
Horam Parish Council Raised an objection to the policy. Areas with Neighbourhood Plans should set locally specific requirements Greater First Homes discounts for people with local connections Minimum occupation period should be required for First Homes purchasers	The Council recognises the role of Neighbourhood Plans in shaping development at the local level. However, affordable housing requirements are established through the Local Plan to provide a consistent strategic framework across the District. Neighbourhood Plans may address locally specific	Comment noted. No changes required.

Affordable housing should be spread across larger sites in multiple clusters	matters where consistent with national policy and the strategic policies of the Local Plan. First Homes discount requirements and eligibility criteria are primarily established through national policy and guidance. The Council does not consider it appropriate to introduce additional local discount requirements through Policy HO8. The occupation, eligibility and resale arrangements for First Homes are governed by national policy and the legal mechanisms used to secure First Homes in perpetuity. It is not considered necessary to introduce additional local occupation period requirements through Policy HO8. The distribution of affordable housing across a site should respond to its design, layout, management requirements and other site-specific considerations. Policy HO8 provides sufficient flexibility to achieve this and does not prescribe fixed clustering requirements.	
Isfield Parish Council Council should learn from other authorities to improve access to affordable housing	Comment noted.	Comments noted. No changes required.
Laughton Parish Council Raised an objection to the policy.	Comment noted.	Comments noted. No changes required.

Development location can affect delivery of on-site affordable housing Greater use of commuted sums should be considered High house prices are worsening affordability problems Support specialist housing providers delivering affordable homes Paragraph 9 should be strengthened	The Council acknowledges that site location and local market conditions can influence the delivery of affordable housing. The policy has been informed by evidence that considers geographical variations across the District and includes flexibility to consider site-specific circumstances where justified by robust evidence. The policy seeks to prioritise the delivery of affordable housing on-site, as this is generally the most effective way of meeting identified housing needs and creating mixed and balanced communities. Circumstances in which alternative approaches, including financial contributions, may be appropriate are addressed through the policy framework and will be considered on a case-by-case basis. Policy HO8 applies to affordable housing provision irrespective of the delivery model and supports schemes that contribute towards meeting identified affordable housing needs in accordance with Local Plan policies. The supporting text and policy have been prepared having regard to national policy, local evidence and the overall	

	objectives of the Local Plan. The representation does not identify specific amendments to paragraph 9, and the Council considers the current wording (now criterion 7) provides appropriate support and context for the policy.	
Mayfield and Five Ashes Parish Council Proposal inadequate to address need	Policy HO8 has been informed by evidence relating to housing need, affordability, viability and deliverability, and seeks to maximise affordable housing provision whilst ensuring development remains capable of being delivered. The Council considers that the policy strikes an appropriate balance between ambition and deliverability.	Comment noted. No changes required
Pevensey Parish Council Supportive the provision of social homes that meet government capping amount for those on benefits.	Comments of support noted.	Comment of support noted. No changes required.
Polegate Town Council Supportive of the policy. Affordable housing requirement should increase to 40% First Homes should have a 40% discount Affordable housing quality should match market housing	Comments of support noted. The Council considers that the policy provides an appropriate and robust framework for securing affordable housing whilst maintaining development viability and deliverability. The Council agrees that affordable housing should be designed and	Comment of support noted. No changes required.

	constructed to a high standard and should integrate successfully with market housing.	
Rotherfield Parish Council Supportive of the policy. Concern that higher affordable housing requirements may affect development viability	Comments of support noted. The Council considers that the policy provides an appropriate and robust framework for securing affordable housing whilst maintaining development viability and deliverability.	Comment of support noted. No changes required.
Uckfield Town Council Supportive of the policy. Affordable housing proportion should be increased to reflect tenure broadening Higher requirement needed to compensate for schemes failing to achieve 35% Affordable housing should meet long-term family needs Self-build housing opportunities should be considered	Comments of support noted. The affordable housing requirements have been established based on evidence of need and viability across the District and are intended to secure the maximum reasonable level of affordable housing delivery. The policy also includes mechanisms to assess site-specific viability where policy-compliant provision cannot be achieved. The Council does not consider it appropriate to increase requirements to compensate for under-delivery on individual schemes. The size, type and tenure of affordable housing secured through Policy HO8 will be informed by the latest evidence of housing need and will	Comment of support noted. No changes required.

	seek to provide homes that meet a range of household requirements over the longer term. The Council considers that this objective is already reflected in the policy framework. The Council recognises the contribution that self-build and custom-build housing can make to housing delivery and choice. However, self-build housing is addressed separately through Policy HO5, which provides the framework for considering such proposals.	
Westham Parish Council Higher affordable housing requirement would address under-provision from smaller sites Higher First Homes discounts may harm viability and reduce affordable housing delivery Mechanisms needed to ensure affordable housing agreed at application stage is delivered	The affordable housing requirements have been established based on evidence of need and viability across the District and are intended to secure the maximum reasonable level of affordable housing delivery. The policy also includes mechanisms to assess site-specific viability where policy-compliant provision cannot be achieved. The Council does not consider it appropriate to increase requirements to compensate for under-delivery on individual schemes. Affordable housing requirements are typically secured through planning obligations and other legal	Comment noted. No changes required.

	agreements, which specify the amount, tenure, timing and delivery arrangements for affordable housing. Compliance is monitored through the development management process. The Council considers that existing mechanisms provide an appropriate means of securing delivery.	
Withyham Parish Council Supportive of the policy	Comments of support noted.	Comment of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Suggested various affordable housing targets (35%, 40%, 45%, 50%) Affordable housing should be provided on developments of 4 or more dwellings Affordable homes should primarily be social rented or rented homes Affordable housing should be available to local people Concerns that affordable homes remain too expensive Concerns that delivery of new homes is not reducing housing waiting lists Concerns about adequacy of affordable housing provision Support for proposed tenure mix Tenure mix should be reviewed regularly Tenure mix should reflect changing housing needs over time Tenure mix should be location-specific	The Council recognises the importance of delivering affordable housing that responds to local needs. Policy HO8 has been informed by evidence of housing need, affordability and viability and seeks to secure an appropriate tenure mix whilst maintaining development deliverability. The policy provides flexibility to respond to changing circumstances and local evidence over time. Requirements relating to First Homes, including discounts, eligibility criteria, price caps and income thresholds, are largely set through national policy and guidance. Policy HO8 has been prepared to operate within that framework whilst	Comments noted. No changes required.

Proposed tenure mix supports local housing needs Support for First Homes First Homes discount should be increased to 40% or 50% First Homes discount should be flexible depending on local house prices or on a case-by-case basis Higher discounts should be available for people with local connections Minimum price for First Homes should be established Suggested maximum First Homes price (£175,000, £250,000) Proposed maximum First Homes price is too low and unrealistic Income cap should be reduced Suggested oncome cap should be increased (£60,000, £70,000) Income cap should reflect mortgage costs, interest rates and wage inflation Concerns that lower First Homes thresholds could increase demand from neighbouring areas Concerns that First Homes reduce provision of shared ownership and rented housing Other affordable housing tenures should reflect local household incomes Affordable housing should be integrated throughout developments Multiple affordable housing clusters may be appropriate on larger sites Affordable homes should be designed to the same standard as market housing	securing an appropriate overall affordable housing mix. The Council agrees that affordable housing should be well integrated, high quality and indistinguishable from market housing wherever practicable. These matters are addressed through Policy HO8 and wider design and sustainability policies within the Local Plan. The policy includes viability and exceptional circumstances provisions to ensure development remains deliverable while maximising affordable housing provision. Affordable housing delivery is secured through planning obligations and monitored through the development management process. The proposed thresholds have been informed by evidence of housing need, viability and local circumstances, including the particular characteristics of the High Weald National Landscape. The Council considers the approach to be justified and proportionate. The size, type and location of housing development are addressed through the wider spatial strategy and housing policies of the Local Plan,	

Need to enforce high-quality affordable housing design All homes should meet environmental standards Objections to exceptional circumstances provisions, weaken the policy Concerns that Criterion 7 undermines affordable housing delivery Threshold should be based on gross dwelling numbers Threshold should include proposals over 1,000sqm GIA Objection to thresholds in the High Weald National Landscape due to viability concerns Viability concerns likely to be used to reduce affordable housing delivery Review mechanisms should be introduced during development build-out Developers should be required to actively seek public subsidy Housing providers should assess allocations against agreed criteria Affordable housing should be completed and occupied before market homes Smaller dwellings should be prioritised Additional housing growth will increase pressure on transport infrastructure Affordable housing may be better delivered in alternative locations with better access to services in some rural areas Support for greater use of Community Land Trusts (CLTs)	supported by infrastructure planning and evidence of local housing needs. The Council recognises the role of a range of delivery mechanisms, including Community Land Trusts and affordable housing providers. However, these matters extend beyond the scope of Policy HO8. The policy has been informed by the Council's evidence base and seeks to maximise affordable housing delivery whilst ensuring schemes remain viable and deliverable.	

Councils should be able to borrow capital to deliver affordable housing Concerns about the viability and effectiveness of affordable housing policy View that the policy lacks ambition and does not reflect best practice Concern that the methodology for determining affordability is flawed Concern that local housing needs and affordability are not being adequately addressed.		
Other Comments	**WDC Response**	
None		

Focused Local Plan Consultation

Total: 139	**Support:** 61	**Neutral:** 31	**Object:** 43

Policy HO8: Affordable Housing		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
Tunbridge Wells Borough Council • Supported the updated policy following the removal of the mandatory First Homes direction. • Requested review of the overall affordable housing percentage and tenure mix before Regulation 19. • Objected to limiting higher affordable provision on mixed-community grounds.	• Comment of support noted. • The proposed tenure mix has been informed by the Council's most up-to-date evidence of housing need and seeks to prioritise the delivery of Social Rent and Affordable Rent whilst also providing opportunities for affordable home ownership. The policy does not prevent the delivery of affordable housing above the minimum requirement	Comment of support noted. No changes required.

• Preferred social rent, with affordable rent capped at Local Housing Allowance rates where viability required. • Suggested considering more low-cost home ownership and accessibility standards.	where appropriate and viable, and accessible housing requirements are addressed through other policies within the Local Plan. The Council considers that the proposed approach provides an appropriate balance between meeting identified needs, supporting mixed and balanced communities and maintaining development viability.	
Town/Parish Councils	**WDC Response**	**Proposed Changes to Policy**
Mayfield and Five Ashes Parish Council • Welcomed removal of the First Homes target if this increased delivery. • Supported the percentage targets but stressed the need to address the identified annual affordable housing requirement.	• Comment noted. • Policy HO8 has been informed by the Council's evidence of housing need and seeks to maximise the delivery of affordable housing through clear percentage requirements, whilst maintaining development viability and deliverability. The policy will contribute towards addressing identified affordable housing needs over the plan period and will be implemented alongside the wider housing strategy and housing delivery policies of the Local Plan.	Comment of support noted. No changes required.
Warbleton Parish Council • Raised no objection but requested that affordable housing remain affordable in perpetuity.	• Comment of support noted. • Policy HO8 operates alongside national policy and other relevant Local Plan policies, and affordable housing is typically secured	Comment of support noted. No changes required.

	through planning obligations and legal agreements that ensure it remains available as affordable housing in perpetuity, where appropriate. The Council considers that existing policy and legal mechanisms provide appropriate safeguards.	
Heathfield and Waldron Parish Council • Fully supported the policy but sought firm implementation and independently evidenced viability exceptions.	• Comment of support noted. • The policy includes mechanisms to ensure effective implementation and delivery of affordable housing, including the requirement for robust viability evidence where applicants seek to justify a reduction in policy-compliant provision. Criterion 5 also enables the Council to require viability assessments to be independently verified at the applicant's expense where necessary. The Council considers that the policy already provides an appropriate framework to ensure viability exceptions are properly evidenced and scrutinised.	Comment of support noted. No changes required.
Rotherfield Parish Council • Supported delivery by housing associations alongside community land trusts and other community-led models.	• Policy HO8 recognises the important role that a range of delivery partners, including housing associations, Community Land Trusts, co-housing schemes, almshouses and other community-	Comment noted. No changes required.

	led housing providers, can play in meeting affordable housing needs. Criterion 7 specifically supports community-led affordable housing proposals where they accord with other policies of the Local Plan. The Council considers that the policy already provides an appropriate framework to support a diverse range of affordable housing delivery models.	
Uckfield Town Council • Supported the policy but requested a six-unit threshold district-wide. • Supported anti-subdivision provisions and the tenure approach. • Sought affordability in perpetuity, tenure-blind design and stronger safeguards against reductions.	• The affordable housing threshold and requirements have been informed by evidence of housing need, viability and deliverability, and the Council does not consider there is sufficient justification for a district-wide six-unit threshold. Affordable housing is generally secured through planning obligations to ensure it remains available to meet identified needs in perpetuity, and Policy HO8 requires affordable housing to be visually indistinguishable from market housing and integrated throughout developments. The policy also contains mechanisms to ensure that any reduction in affordable housing provision is supported by robust viability evidence.	Comment noted. No changes required.

Little Horsted Parish Meeting • Sought stronger local-need, energy efficiency, smaller-home and accessibility requirements. • Requested strict control of viability reductions, committee oversight and local retention of commuted sums. • Supported rural worker housing, specialist housing and affordability in perpetuity.	• The matters raised regarding local needs, energy efficiency, housing mix, accessibility standards, viability assessment, affordable housing contributions and the use of commuted sums are addressed through Policy HO8 and the wider Local Plan policy framework. The Council considers that the policy strikes an appropriate balance between securing affordable housing delivery, responding to identified needs and maintaining development viability.	Comment noted. No changes required.
Wadhurst Parish Council • Supported the update but considered overall provision inadequate and sought stronger delivery by developers.	• The affordable housing requirements in Policy HO8 have been informed by evidence of housing need, viability and deliverability and seek to maximise the provision of affordable housing across the District. The Council recognises the importance of increasing affordable housing delivery and considers that the policy provides an appropriate framework to secure contributions from development whilst ensuring schemes remain viable and deliverable.	Comment noted. No changes required.
Chalvington with Ripe Parish Council	• The tenure mix set out in criterion 3 is based on the Council's most up-to-date evidence of housing need	Comment noted. No changes required.

• Broadly supported the policy, but sought clearer tenure expectations and stronger limits on viability exemptions.	and provides clear expectations for affordable housing delivery whilst allowing flexibility where justified by evidence. The Council also considers that criterion 5 provides an appropriate framework for assessing viability claims, requiring robust evidence and allowing independent verification where necessary. The policy therefore strikes an appropriate balance between maximising affordable housing provision and ensuring development remains deliverable.	
Laughton Parish Council • Supported the tenure mix but requested stronger delivery mechanisms for co-housing, co-operatives, self-build and community-led housing. • Sought serviced plots on medium and large sites and rural exception-site flexibility.	• Policy HO8 recognises the important role that community-led housing models, including co-housing schemes, co-operatives and Community Land Trusts, can play in delivering affordable homes, and criterion 7 provides support for such proposals where they accord with other policies of the Local Plan. Matters relating to self-build housing, serviced plots and rural exception sites are addressed through separate policies within the Local Plan.	Comment noted. No changes required.
Site Promoters and Development Industry	**WDC Response**	**Proposed Changes to Policy**
Batcheller Monkhouse	• Comment noted. • The proposed thresholds have been informed by evidence of	Comment noted. No changes required.

• Objected to the 0.5-hectare threshold and six-unit High Weald threshold on viability and Registered Provider uptake grounds. • Requested a ten-unit threshold district-wide and warned that flexibility provisions could delay delivery.	housing need, viability and local circumstances, including the particular characteristics of the High Weald National Landscape. The policy seeks to maximise affordable housing delivery while ensuring development remains viable and deliverable. The Council also considers that the flexibility provisions are necessary to address exceptional site-specific circumstances and ensure that development can come forward where justified by robust evidence. The Council is satisfied that the proposed thresholds and flexibility provisions strike an appropriate balance between securing affordable housing and maintaining development viability and this evidenced in our viability study.	
Genesis Town Planning / Sigma • Supported the 35% requirement subject to flexibility. • Considered the viability assessment understated the Building Safety Levy, biodiversity net gain, net-zero and specialist accommodation costs.	• The Council welcomes support for the 35% affordable housing requirement. The affordable housing requirements in Policy HO8 have been informed by the Council's viability evidence, which considered a range of typologies, policy costs and development scenarios. The policy also includes flexibility through criterion 5,	Comment noted. No changes required.

	allowing site-specific viability evidence to be submitted where it can be demonstrated that policy-compliant provision would make a development unviable. The Council considers that this approach provides an appropriate balance between maximising affordable housing delivery and maintaining development viability.	
Home Builders Federation • Considered the viability assessment understated regulatory, biodiversity and net-zero costs. • Requested exemption of specialist older persons' housing from affordable housing requirements.	• The affordable housing requirements set out in Policy HO8 have been informed by the Council's viability evidence, which considered a range of development costs and policy requirements. The Council recognises that development costs may change over time and, for this reason, criterion 5 allows site-specific viability evidence to be submitted where applicants consider that policy-compliant provision would make development unviable. The Council considers that the policy provides an appropriate balance between securing affordable housing and maintaining development viability. • Specialist housing for older people can make an important contribution to meeting housing	Comment noted. No changes required.

	needs across the District. However, the Council does not consider that a blanket exemption from affordable housing requirements is justified. Proposals will be assessed in accordance with Policy HO8 and other relevant Local Plan policies, with viability considerations taken into account where supported by robust evidence. The Council considers that the existing policy provides sufficient flexibility to address site-specific circumstances.	
BYond Homes Limited • Welcomed removal of the mandatory First Homes requirement. • Requested flexibility in the 80% rented tenure component and cascades in legal agreements.	• The affordable housing tenure mix set out in Policy HO8 has been informed by the Council's most up-to-date evidence of housing need and seeks to prioritise the delivery of rented affordable housing whilst allowing flexibility where justified by evidence. The Council also recognises the role of cascade mechanisms in supporting the delivery and occupation of affordable housing and considers that such matters are most appropriately addressed through planning obligations and legal agreements on a site-by-site basis.	Comment noted. No changes required.

The Nevill Estate Company / Stratton Estates • Objected to the six-unit High Weald threshold because of viability, infrastructure levy and funding constraints. • Requested reinstatement of a ten-unit threshold and supported tenure flexibility and community-led housing.	• The proposed thresholds have been informed by evidence of housing need, viability and the particular characteristics of the High Weald National Landscape. The Council considers that the policy strikes an appropriate balance between maximising affordable housing delivery and maintaining development viability.	Comment noted. No changes required.
Cochrane Strategic Development Limited / Stantec UK Limited • Supported 35% in principle but requested flexibility for viability, competing policy priorities and tenure mix. • Identified significant potential delivery at North West Hailsham.	• The Council welcomes support for the 35% affordable housing requirement. Policy HO8 has been informed by evidence of housing need, viability and deliverability and includes flexibility where robust evidence demonstrates that policy-compliant provision would make development unviable. The policy also allows alternative tenure mixes where justified by the Council's most up-to-date evidence of housing need. • The Council notes the potential contribution of the North West Hailsham allocation towards affordable housing delivery; however, site-specific delivery has been considered through the spatial strategy.	Comment noted. No changes required.
High Cross Investments (2023) Ltd	• The affordable housing tenure mix set out in Policy HO8 has been	Comment noted. No changes required.

• Supported the policy in principle and removal of mandatory First Homes. • Requested First Homes as an alternative on small sites where no Registered Provider was interested. • Sought review of the 80% rented tenure share.	informed by the Council's most up-to-date evidence of housing need and seeks to prioritise the delivery of rented affordable housing whilst allowing flexibility where justified by evidence. The Council recognises that site-specific circumstances, including Registered Provider interest, may vary and these matters can be considered through the application of the policy and the development management process. The Council considers that the proposed tenure mix and flexibility provisions provide an appropriate balance between meeting identified housing needs and supporting delivery.	
Elivia Homes / Boyer Planning • Supported the objectives and 35% requirement but sought clearer flexibility for tenure, Registered Provider preferences, off-site provision, fractional units and a cascade mechanism.	• The Council welcomes support for the objectives of Policy HO8 and the 35% affordable housing requirement. The policy has been informed by evidence of housing need, viability and deliverability and provides flexibility where justified by robust evidence, including in relation to tenure mix. Matters such as Registered Provider preferences, off-site provision, treatment of fractional units and cascade mechanisms	Comment noted. No changes required.

	are typically addressed through the development management process and secured through planning obligations having regard to the circumstances of individual sites.	
Esquire Developments • Questioned viability assumptions and objected to the six-unit High Weald threshold. • Requested a district-wide ten-unit threshold with an area test.	• The proposed thresholds have been informed by evidence of housing need, viability and the particular characteristics of the High Weald National Landscape. The Council considers that the policy strikes an appropriate balance between maximising affordable housing delivery and maintaining development viability.	Comment noted. No changes required.
Martin Grant Land / Turley • Supported the exceptional-circumstances provision but requested local and site-specific flexibility in tenure mix.	• The affordable housing tenure mix set out in Policy HO8 has been informed by the Council's most up-to-date evidence of housing need. However, criterion 3 already allows for an alternative tenure mix where justified by that evidence, and criterion 5 provides flexibility where robust viability evidence demonstrates that policy-compliant provision would make development unviable. The Council considers that the policy provides an appropriate balance between delivering identified housing needs	Comment noted. No changes required.

	and responding to site-specific circumstances.	
DHA Planning for Bellway Homes Strategic, Dandara Ltd, Hempstead Farm Ltd and Taylor Wimpey • Raised concerns about small rural affordable clusters and limited Registered Provider capacity. • Requested removal or relocation of First Homes references and greater flexibility to vary tenure where provider interest was absent.	• Policy HO8 has been informed by evidence of housing need and seeks to secure an appropriate mix of affordable housing tenures whilst maintaining flexibility where justified. The policy already allows for an alternative tenure mix where supported by the Council's most up-to-date evidence of housing need, and viability considerations may also be taken into account where appropriate. The Council considers that references to First Homes reflect the current national policy framework and that the policy provides sufficient flexibility to respond to site-specific circumstances, including Registered Provider interest and delivery considerations.	Comment noted. No changes required.
Judith Ashton Associates / Persimmon Homes South East • Supported the revised tenure split but retained concerns about deliverability of First Homes and rigid dispersal requirements. • Requested flexibility where Registered Providers preferred alternative clustering.	• The policy has been informed by evidence of housing need and seeks to deliver a balanced mix of affordable housing tenures whilst creating mixed and balanced communities. The Council acknowledges that Registered Provider preferences and site-specific circumstances may vary. Policy HO8 does not prescribe rigid	Comment noted. No changes required.

	cluster sizes and allows the detailed layout and distribution of affordable housing to be considered through the design and development management process. The Council considers that the policy already provides sufficient flexibility whilst ensuring affordable housing is appropriately integrated within developments.	
Fernham Homes Operations Limited / Neame Sutton • Objected to the 80% rented tenure share and sought alternative affordable tenures where Registered Providers could not deliver it.	• The proposed tenure mix has been informed by the Council's most up-to-date evidence of housing need, which identifies a significant need for rented affordable housing. However, Policy HO8 already allows for an alternative tenure mix where justified by the Council's housing needs evidence and relevant site-specific circumstances. The Council considers that this approach provides appropriate flexibility whilst ensuring that identified housing needs are prioritised.	Comment noted. No changes required.
Inspired Villages Group • Objected to applying the same 35% requirement to C2 extra-care schemes without specific viability testing. • Highlighted higher capital, communal facility and operating costs.	• The affordable housing requirement in Policy HO8 has been informed by the Council's viability evidence and seeks to secure affordable housing delivery across a range of development types. The Council recognises that	Comment noted. No changes required.

	specialist accommodation, including extra-care housing, may have different cost and viability considerations and these have been considered in the viability work. However, Policy HO8 already provides flexibility where robust viability evidence demonstrates that policy-compliant provision would make a development unviable.	
The Planning Bureau Limited • Sought exemption or greater flexibility for flatted older persons' housing. • Provided detailed alternative assumptions for unit mix, costs, sales periods, communal space and developer return.	• The affordable housing requirements in Policy HO8 have been informed by the Council's evidence base, including viability evidence that considered a range of development typologies and circumstances. The Council recognises that specialist and older persons' housing may have different development and operational characteristics. However, Policy HO8 already includes flexibility where robust viability evidence demonstrates that policy-compliant provision would make a development unviable.	Comment noted. No changes required.
Grassroots Planning • Emphasised acute affordable, rented and specialist housing needs.	• Policy HO8 has been informed by the Council's evidence of housing need and seeks to maximise the delivery of affordable housing	Comment noted. No changes required.

• Promoted larger strategic mixed-use sites as capable of delivering affordable and specialist accommodation at scale.	through appropriate policy requirements. The Council also recognises the important role that larger strategic sites can play in delivering affordable and specialist housing as part of comprehensive mixed-use development. The contribution of such sites is addressed through the spatial strategy, site allocations and the wider policies of the Local Plan.	
Walsingham Planning / Harvey & Son (Lewes) Ltd • Raised no objection to the 35% requirement or tenure split, subject to site-specific viability.	• Comment noted.	Comment noted. No changes required.
Knight Frank • Supported the 35% requirement but sought explicit tenure and delivery cascades, review clauses, monitoring and grant-funded delivery routes.	• Policy HO8 establishes the affordable housing requirement, tenure expectations and mechanisms for considering viability on qualifying developments. Matters such as cascade arrangements, monitoring provisions, review mechanisms and grant funding opportunities are typically addressed through planning obligations, legal agreements and the development management process on a site-by-site basis. The Council considers that the policy provides an appropriate strategic framework	Comment noted. No changes required.

	whilst retaining the flexibility necessary to respond to individual site circumstances and funding arrangements.	
Other Consultee Bodies and Named Respondents	**WDC Response**	**Proposed Changes to Policy**
Rotherfield Protection Group • Requested a five-unit High Weald threshold, consistent with the adopted approach and national rural-area provisions.	• The proposed affordable housing thresholds have been informed by the Council's evidence of housing need, viability and deliverability, including consideration of the particular circumstances of the High Weald National Landscape. The Council considers that the proposed six-unit threshold strikes an appropriate balance between maximising affordable housing delivery and ensuring that development remains viable and deliverable. The evidence does not support a further reduction in the threshold to five dwellings.	Comment noted. No changes required.
Dicker Residents Association • Sought a longer-term response to housing demand and integration of starter homes within mixed developments.	• Policy HO8 forms part of a wider Local Plan strategy that seeks to address identified housing needs over the plan period through a balanced mix of housing types, tenures and delivery mechanisms. The policy supports mixed and balanced communities and allows for affordable home ownership products as part of the affordable housing tenure mix.	Comment noted. No changes required.

Community Project Ltd (Laughton Lodge) • Sought stronger support for community-led housing, serviced plots, rural exception sites and a clear definition.	• Policy HO8 already provides support for community-led affordable housing through criterion 7, whilst serviced plots, rural exception sites and related forms of development are addressed through other relevant policies within the Local Plan. The Council considers that the existing policy framework provides appropriate support and that further definition or additional policy requirements are not necessary.	Comment noted. No changes required.
Anchor • Sought a numerical target and allocations for older persons' housing, with flexibility in tenure and mix.	• The Council acknowledges the need for older persons' housing and specialist accommodation. These needs have informed the Local Plan evidence base, housing requirement and the policies relating to specialist housing and housing mix. The delivery of older persons' accommodation will be considered through the spatial strategy, site allocations and relevant housing policies. The Council does not consider it necessary to include a specific numerical target or separate allocations within Policy HO8, which relates to affordable housing provision.	Comment noted. No changes required.

Conservators of Ashdown Forest • Requested affordable and social housing to meet local need rather than inward migration within the Zone of Influence. • Sought stronger protection for ecological connectivity and an assumption against market housing.	• Policy HO8 has been informed by the Council's evidence of housing need and seeks to secure affordable housing to meet needs arising across the District. The delivery and allocation of affordable housing are governed through the Council's housing policies, allocations framework and relevant legal agreements. Ecological connectivity and biodiversity impacts are addressed through the wider environmental policies of the Local Plan.	Comment noted. No changes required.
NHS Property Services Limited • Requested assessment of affordable housing needs of NHS and care staff and engagement with local health partners.	• The Local Plan evidence base considers housing needs across the District, including the needs of households who may work in essential services. Ongoing engagement with health partners and other stakeholders forms part of the plan-making process and will continue to inform housing delivery. However, Policy HO8 is intended to address affordable housing needs across the wider community, and it is not considered necessary to include specific affordable housing requirements for particular occupational groups within this policy.	Comment noted. No changes required.

High Weald National Landscape • Supported the six-unit threshold, tenure-blind design and community-led housing provisions.	• Comment of support noted.	Comment of support noted. No changes required.
Clarity Ecoworks • Supported 35% and suggested Council-led development to benchmark viability claims.	• Comment of support noted.	Comment of support noted. No changes required.
Team Dynamics International • Opposed using affordable housing to justify development at Frant because of landscape, water and accessibility constraints. • Preferred brownfield locations near services and employment.	• Policy HO8 provides a district-wide framework for securing affordable housing and does not allocate sites or establish the principle of development in specific locations. The suitability of individual sites, including landscape impact, infrastructure capacity, accessibility and environmental constraints, is considered through the spatial strategy, site allocation policies and the determination of planning applications.	Comments noted. No changes required.
Community Campaigner David Barton • Linked support to traditional design codes and protection of pre-1950 buildings.	• The design and appearance of new development, together with the conservation of heritage assets and locally distinctive buildings, are addressed through the wider design and historic environment policies of the Local Plan.	Comments noted. No changes required.
On the Go, Polegate High Street Shop	• Policy HO8 should be read alongside the wider spatial strategy and infrastructure policies of the	Comments noted. No changes required.

• Supported affordable housing where properly located and supported by infrastructure and services.	Local Plan, which seek to ensure that new development is supported by the necessary services, facilities and infrastructure.	
Trustees of the Withyham Settlement c/o CLM Ltd • Supported the policy changes.	• Comment of support noted.	Comment of support noted. No changes required.
DHA Planning Limited • Raised no objection and confirmed a 21-unit proposal aligned with the revised requirements.	• Comment of support noted.	Comment of support noted. No changes required.
Pantiles and Park Ward Councillors, Tunbridge Wells Borough Council • Requested cooperation so affordable homes on allocations south of Tunbridge Wells could help meet borough needs.	• Policy HO8 establishes the affordable housing requirements for development within the District and is intended to meet identified affordable housing needs arising within the District. Strategic cross-boundary housing matters are addressed through the Local Plan evidence base and ongoing engagement with neighbouring authorities.	Comment noted. No changes required.

Local Residents	WDC Response	Proposed Changes to Policy
Grouped local residents • Many supported affordable housing in principle, including the 35% requirement and greater emphasis on social rent, smaller homes and accommodation for younger people, key workers, older people and residents with disabilities. • Repeated concern that developers reduced or avoided affordable housing through viability arguments, lack of Registered Provider interest or post-permission changes; residents sought independent scrutiny, penalties, review clauses and delivery early in site build-out. • Some considered 35% insufficient, while others considered it unviable or sought a lower requirement. • Residents sought genuinely affordable homes linked to local incomes and need, affordability in perpetuity, local-connection criteria and local retention of commuted sums. • Many requested a wider mix including social rent, one- to three-bedroom homes, flats, accessible and adaptable housing, rural worker housing and community-led models. • Several requested stronger energy-efficiency, drainage and sustainable-design standards.	• Policy HO8 has been informed by evidence of housing need, affordability, viability and deliverability, and seeks to secure an appropriate mix of affordable housing tenures whilst maintaining development viability. The policy includes mechanisms to scrutinise viability claims and is supported by wider Local Plan policies relating to housing mix, accessibility, infrastructure, design, sustainability and the spatial strategy. Site suitability, infrastructure provision and environmental impacts are addressed through the wider Local Plan framework and the assessment of individual planning applications. The Council considers that Policy HO8 provides an appropriate and balanced approach to securing affordable housing across the District.	Comment noted. No changes required.

• Numerous responses stressed infrastructure, public transport, employment, schools, healthcare, water and drainage capacity, and opposed using affordable housing to justify unsustainable greenfield or National Landscape development, particularly at Frant and around Heathfield, Horam, Uckfield and Upper Dicker. • Some supported brownfield-first delivery, reuse of empty buildings and development within existing settlements. • Several responses sought clearer plain-English definitions and explanation of how affordable housing percentages translated into overall delivery.		

Policy HO9: Gypsy, Traveller and Travelling Showpeople – Site Criteria

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 26	**Support:** 21	**Neutral:** 4	**Object:** 1

Policy HO9: Gypsy, Traveller and Travelling Showpeople – Site Criteria		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Environment Agency • Supported the flood-risk provisions discouraging highly vulnerable Traveller, caravan and holiday-home development in areas at risk of flooding.	• Comment of support noted.	Comment of support noted. No changes required.
Natural England • Requested stronger policy wording protecting the High Weald National Landscape and South Downs National Park setting, and inclusion of the Ashdown Forest SPA Habitats Regulations requirement within Policy HO9.	• Comment noted. • The Council recognises the importance of protecting nationally designated landscapes and internationally important habitats. Criterion 1(g) of Policy HO9 already requires development within or affecting the setting of nationally designated landscapes to conserve and enhance their special qualities. In addition, relevant landscape, biodiversity and habitat protection	Comment noted. No changes required.

	policies within the Local Plan apply to all proposals. The requirement for Habitats Regulations Assessment and any necessary mitigation in relation to Ashdown Forest arises from separate legislation and applies where relevant, irrespective of whether it is specifically referenced within this policy. However, this is alluded to in the supporting text of the policy. The Council therefore considers that appropriate safeguards are already provided.	
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
Rother District Council • Requested clarification of "temporary" and confirmation of whether Policy HO9 applied to transit sites.	• Comment noted. • The Council acknowledges the request for clarification regarding the meaning of "temporary" and whether Policy HO9 applies to transit sites. The policy is intended to apply to temporary accommodation associated with the uses specified within the policy and should be read alongside relevant national policy and guidance. The application of the policy to specific forms of accommodation, including transit sites, will be determined having regard to the policy wording, its supporting text and the circumstances of the proposal.	Comment noted. No changes required.

Town/Parish Councils	WDC Response	Proposed Changes to Policy
Heathfield and Waldron, Withyham and Rotherfield Parish Councils • Supported Policy HO9,	• Comment of support noted.	Comment of support noted. No changes required.
Mayfield and Five Ashes Parish Council • Supported Policy HO9, encouraged authorised provision and sought firm enforcement against unauthorised sites.	• Comment of support noted. • The policy seeks to facilitate the provision of appropriate sites to meet identified needs whilst ensuring that impacts on local communities and the environment are appropriately managed. The enforcement of unauthorised development is addressed through the Council's planning enforcement powers and relevant legislation rather than through Local Plan policy wording.	Comment of support noted. No changes required.
Horam Parish Council • Requested Policy HO9(g) to address development within or affecting the setting of the High Weald National Landscape and South Downs National Park.	• Comment noted. • The Council recognises the importance of protecting nationally designated landscapes and internationally important habitats. Criterion 1(g) of Policy HO9 already requires development within or affecting the setting of nationally designated landscapes to conserve and enhance their special qualities.	Comment noted. No changes required.
Polegate Town Council	• Comment of support noted. • The policy seeks to facilitate the provision of appropriate sites to	Comment of support noted. No changes required.

• Supported the policy but stressed enforcement of temporary-site planning conditions and adequate enforcement resources.	meet identified needs whilst ensuring that impacts on local communities and the environment are appropriately managed. The enforcement of unauthorised development is addressed through the Council's planning enforcement powers and relevant legislation rather than through Local Plan policy wording.	
Hellingly Parish Council • Supported provision subject to site maintenance and local contribution; suggested 10 to 15 pitches per site and questioned minimum pitch sizes.	• Policy HO9 seeks to ensure that sites provide an appropriate standard of accommodation, facilities and amenity whilst integrating successfully with their surroundings. The Council does not consider it appropriate to prescribe fixed site sizes, pitch numbers or minimum pitch dimensions within the policy, as these matters will vary depending on site-specific circumstances, the needs of occupiers and the characteristics of the location. Proposals will be assessed on their individual merits against the criteria of the policy.	
Site Promoters	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Dicker Residents Association	• The policy seeks to facilitate the provision of appropriate sites to	Comment noted. No change required.

• Requested greater monitoring of unauthorised Traveller sites.	meet identified needs whilst ensuring that impacts on local communities and the environment are appropriately managed. The enforcement of unauthorised development is addressed through the Council's planning enforcement powers and relevant legislation rather than through Local Plan policy wording.	
Village Concerns • Supported Policy HO9.	• Comment of support was noted.	Comment noted. No change required.

Local Residents	**WDC Response**	**Proposed Changes to Policy**
Local residents, grouped summary • Broad support for Policy HO9 and no change. • Requested Policy HO9(g) to cover the setting of the High Weald National Landscape. • Sought clarity on whether the stated accommodation need comprised additional or existing pitches, likely site scale and essential utilities. • Raised concerns about refuse, crime and surveillance. • Requested the minimum landscaped buffer to increase from 3 metres to 6 metres.	• The Council welcomes support for Policy HO9. Criterion 1(g) is intended to ensure that development conserves and enhances the special qualities of nationally designated landscapes, including where development affects their setting. The scale, layout, pitch provision, utilities, landscaping, refuse storage and other site requirements will be considered on a site-by-site basis having regard to the needs of occupiers and the characteristics of the site. Matters relating to site management, security and	Comment noted. No change required.

	surveillance are generally addressed through the detailed design and operation of individual sites. The Council considers that the policy provides sufficient flexibility whilst ensuring appropriate safeguards are in place.	

Focused Local Plan Consultation

Total: 65	**Support:** 24	**Neutral:** 12	**Object:** 24

Policy HO9: Gypsy, Traveller and Travelling Showpeople – Site Criteria		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
South Downs National Park Authority • Welcomed criterion (h) but requested alignment with national policy wording for development within the setting of designated landscapes. Requested supporting text confirming that unidentified sites would be positively considered against Policy HO9 where a five-year supply could not be demonstrated.	• Comments noted. • The Council welcomes support for criterion 1(h). The policy has been prepared having regard to national policy and seeks to ensure that proposals affecting nationally designated landscapes conserve and enhance their special qualities. The Council considers that the existing wording provides an appropriate basis for assessing	Criterion 1 (g) of the Regulation 19 Local Plan, formerly criterion 1 (h) of the Focused Draft Local Plan has been updated to reflect national policy on designated landscapes.

	impacts on designated landscapes and their settings.	
East Sussex County Council • Made no specific objection, but requested ecological assessments and constraint plans for development, with mitigation and enhancement informed by the Local Nature Recovery Strategy. County Archaeology noted that heritage could be a material consideration for major development or proposals within Archaeological Notification Areas.	• Comments noted. • Ecological impacts, biodiversity enhancement and heritage considerations are important planning considerations and are addressed through the wider environmental, biodiversity and historic environment policies of the Local Plan, together with relevant national legislation and guidance. Where required, development proposals will be supported by appropriate ecological or archaeological evidence and assessed having regard to site-specific constraints and opportunities. The Council does not consider it necessary to duplicate these requirements within Policy HO9.	Comments noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Town/Parish Councils	**WDC Response**	**Proposed Changes to Policy**
Hadlow Down Parish Council • Supported Policy HO9 but objected to OGT4, stating that it conflicted with criteria (b), (e), (g) and (h), the spatial strategy, countryside	• Comment noted. • The suitability of OGT4 has been assessed through the site selection process having regard to the evidence base, the spatial strategy, identified accommodation needs	Comments noted. No change required.

restraint and the High Weald landscape objectives.	and relevant environmental constraints. The Council would need to confirm that any allocation is capable of complying with the criteria of Policy HO9 and other relevant Local Plan policies, including those relating to landscape protection, countryside character and the High Weald National Landscape.	
Mayfield and Five Ashes Parish Council • Supported Policy HO9 and requested firm enforcement against unauthorised sites while encouraging and maintaining authorised provision.	• The policy seeks to facilitate the provision of appropriate sites to meet identified needs whilst ensuring that impacts on local communities and the environment are appropriately managed. The enforcement of unauthorised development is addressed through the Council's planning enforcement powers and relevant legislation rather than through Local Plan policy wording.	Comments noted. No change required.
Warbleton Parish Council • Requested that provision for equines be considered.	• Policy HO9 requires sites to provide appropriate facilities to meet the needs of occupiers and, in the case of Travelling Showpeople, criterion 1(j) specifically recognises the need for space associated with equipment, animals, vehicles and trailers. The requirement for land or facilities for equines will vary depending on the circumstances	Comments noted. No change required.

	and intended occupiers of a site and can be considered through the assessment of individual proposals.	
Heathfield and Waldron Parish Council • Supported the policy but requested a new heritage criterion. Objected to OGT3 Monkhurst Field, citing poor access to services, highways constraints, flood and drainage effects, landscape and visual harm, heritage impacts, ecology, infrastructure, screening and the intensity of development required.	• Comment of support noted for Policy HO9. • The Council notes the objection to OGT3. The allocation has been assessed through the site selection process having regard to the evidence base, identified accommodation needs and relevant environmental and infrastructure constraints. The Council would need to confirm that any allocation is capable of complying with the criteria of Policy HO9 and other relevant Local Plan policies.	Comments noted. No change required.
Rotherfield Parish Council • Supported Policy HO9.	• Comment of support noted.	Comment of support noted. No changes required.
Uckfield Town Council • Supported the policy where sites met the criteria and expressed a preference for registered sites.	• Comment of support noted.	Comment of support noted. No changes required.
Wadhurst Parish Council • Supported Policy HO9 and requested encouragement and maintenance of authorised sites alongside firm enforcement against unauthorised sites.	• Comment of support noted. • The policy seeks to facilitate the provision of appropriate sites to meet identified needs whilst ensuring that impacts on local communities and the environment	Comment of support noted. No changes required.

	are appropriately managed. The enforcement of unauthorised development is addressed through the Council's planning enforcement powers and relevant legislation rather than through Local Plan policy wording.	
Chalvington with Ripe Parish Council • No comments.	• Comment noted.	Comment noted. No changes required.
Site Promoters	**WDC Response**	**Proposed Changes to Policy**
High Cross Investments (2023) Ltd • Confirmed that it was not promoting a Gypsy, Traveller or Travelling Showpeople site and made no observations on Policy HO9.	• Comment noted.	Comment noted. No changes required.
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Community Campaigner David Barton • Requested use of authentic Traveller accommodation design codes or equivalent.	• Policy HO9 seeks to ensure that Gypsy, Traveller and Travelling Showpeople sites provide an appropriate standard of accommodation whilst integrating successfully with their surroundings and meeting the needs of occupiers. Detailed design considerations will be assessed through the policy, relevant design policies within the Local Plan and any applicable national guidance. The Council does not consider it necessary to require a	Comment noted. No changes required.

	separate Traveller-specific design code within Policy HO9.	
Dicker Residents Association • No comment.	• Comment noted.	Comment noted. No changes required.
Conservators of Ashdown Forest • Expressed no position on Policy HO9.	• Comment noted.	Comment noted. No changes required.
The Nevill Estate Company • No comment.	• Comment noted.	Comment noted. No changes required.
Community Project Ltd (Laughton Lodge) • Welcomed the care taken in preparing the policy.	• Comment of support noted.	Comment of support noted. No changes required.
Parkwood Hall • Raised site-specific concerns regarding OGT5 Hawkenbury Road, including highway access, lack of mains drainage and gas, unreliable water supply, isolation from services, local amenity and environmental effects.	• Comment of support noted for Policy HO9. • The Council notes the objection to OGT5. The allocation has been assessed through the site selection process having regard to the evidence base, identified accommodation needs and relevant environmental and infrastructure constraints. The Council would need to confirm that any allocation is capable of complying with the criteria of Policy HO9 and other relevant Local Plan policies.	Comment noted. No changes required.
Team Dynamics International	• Policy HO9 reflects the specific accommodation, operational and	Comment noted. No changes required.

• Contended that the policy could raise equality and fairness concerns because the specified accommodation, parking, business and vehicle provisions could exceed those available to other households.	living requirements of Gypsies, Travellers and Travelling Showpeople, consistent with national planning policy and the recognised needs of these groups. The criteria seek to ensure that sites provide an appropriate standard of accommodation and facilities necessary for their intended use, whilst also ensuring that impacts on the surrounding area are appropriately managed. The Council considers that the policy provides a proportionate and justified approach to meeting identified accommodation needs	

Local Residents	**WDC Response**	**Proposed Changes to Policy**
• Responses included support, conditional support, neutrality and objection to Policy HO9. • Several residents supported fair, safe provision but requested robust safeguards, enforcement and controls on unauthorised development. • Frequent concerns related to OGT3 Monkhurst Field, including its High Weald location, landscape and heritage effects, ancient woodland and ecology, flooding and drainage, access on Sandy Cross Lane, traffic safety,	• Concerns raised regarding specific site allocations, including landscape, heritage, biodiversity, flooding and drainage, highways, infrastructure capacity, residential amenity and access to services, have been considered through the site assessment process, Sustainability Appraisal and supporting evidence base.	Comment noted. No changes required.

infrastructure capacity, noise, light and effects on nearby residents. • Concerns about Frant and OGT5 included remoteness from services, narrow roads, unsafe junctions, limited pedestrian access, utilities, drainage, landscape sensitivity and local amenity. • Some respondents questioned whether sites should receive development rights or facilities beyond those available to other forms of development and requested consistent application of planning criteria. • Requested policy changes included consideration of effects on existing neighbours under criterion (f), stronger heritage protection, downstream flood risk, brownfield-first and existing-site-first sequencing, local connection, stronger countryside and protected landscape safeguards, equine provision and appropriate design guidance. • Some respondents considered the criteria too restrictive, while others stated that the policy was clear, reasonable or acceptable in principle. • Several responses requested consultation with Gypsy, Traveller and Travelling Showpeople communities and stronger recognition of local community views.	• The Council acknowledges suggestions relating to stronger safeguards for neighbouring amenity, heritage assets, flood risk, countryside protection, design requirements, local connections and community engagement. However, these matters are addressed through the policy criteria and the wider Local Plan framework, which should be read as a whole. The Council also notes requests for consultation with Gypsy, Traveller and Travelling Showpeople communities and has undertaken engagement in accordance with relevant statutory requirements during plan preparation.	

Policy HO10: Gypsy, Traveller, and Travelling Showpeople – Safeguarding Sites

Number of comments received

Regulation 18 Draft Local Plan Consultation

Total: 26	**Support:** 25	**Neutral:** 1	**Object:** 0

Policy HO10 – Gypsy, Traveller and Travelling Showpeople Safeguarding Sites		
Statutory Consultees	**WDC Response**	
No Reponses		
Neighbouring/Other Local Authorities	**WDC Response**	
Rother District Council • Supported draft Policy HO10 on Gypsy, Traveller and Travelling Showpeople safeguarding sites.	• Comment of support noted.	Comment of support noted. No changes required.
Town/Parish Councils	**WDC Response**	
Horam Parish Council • Supported draft Policy HO10.	• Comment of support noted.	Comment of support noted. No changes required.
Withyham Parish Council • Supported draft Policy HO10.	• Comment of support noted.	Comment of support noted. No changes required.

Mayfield and Five Ashes Parish Council • Supported draft Policy HO10. • Stated that unauthorised sites were emerging and should be subject to the full force of enforcement.	• Comments of support noted. Unauthorised development would continue to be addressed through the Council's planning enforcement powers and procedures. This matter did not require additional policy wording within Policy HO10.	Comment of support noted. No changes required.
Isfield Parish Council • Requested specific provision to protect residential amenity.	• The concern regarding residential amenity is noted. Policy HO10 safeguards authorised sites from alternative development and does not determine proposals for new or intensified sites, which is considered under Policy HO9. Residential amenity would be considered through that policy and the design policies of this Local Plan.	Comment noted. No changes required.
Polegate Town Council • Supported draft Policy HO10.	• Comment of support noted.	Comment of support noted. No changes required.
Heathfield and Waldron Parish Council • Supported draft Policy HO10. • Requested consideration of maximum density and pitches in sustainable locations.	• Comment of support noted. The density, number of pitches and sustainability of locations would be considered where proposals for new or intensified sites come	Comment of support noted. No changes required.

	forward, having regard to the relevant Policy HO9 and site location within this Local Plan. Policy HO10 is limited to safeguarding existing authorised sites.	
Laughton Parish Council • Supported draft Policy HO10.	• Comment of support noted.	Comment of support noted. No changes required.
Site Promoters	**WDC Response**	
No Responses		
Other Consultee Bodies	**WDC Response**	
Dicker Resident Association • Supported draft Policy HO10.	• Comment of support noted.	Comment of support noted. No changes required.
Village Concerns • Supported draft Policy HO10.	• Comment of support noted.	Comment of support noted. No changes required.
Clarity Ecoworks • Supported draft Policy HO10.	• Comment of support noted.	Comment of support noted. No changes required.
The Working Group Against Over Development • Supported draft Policy HO10. • Requested specific provision to protect residential amenity.	• Comment of support noted. The concern regarding residential amenity is also noted. Policy HO10 safeguards authorised sites from alternative development and does not determine proposals for new or intensified sites, which is	Comment of support noted. No changes required.

	considered under Policy HO9. Residential amenity would be considered through that policy and the design policies of this Local Plan.	
CPRE Sussex • Supported draft Policy HO10. • Requested specific provision to protect residential amenity.	• Comment of support noted. The concern regarding residential amenity is also noted. Policy HO10 safeguards authorised sites from alternative development and does not determine proposals for new or intensified sites, which is considered under Policy HO9. Residential amenity would be considered through that policy and the design policies of this Local Plan.	No change proposed.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
• Supportive of Policy HO10 • considered that the policy lacked provision to protect the residential amenity of existing pitches. • requested protection for current sites to prevent illegal sites being created.	• Comment of support noted. The concern regarding residential amenity is also noted. Policy HO10 safeguards authorised sites from alternative development and does not determine proposals for new or intensified sites, which is considered under Policy HO9. Residential amenity would be	No change proposed.

	considered through that policy and the design policies of this Local Plan. The request to prevent illegal sites was also noted; unauthorised development would be addressed through the Council's planning enforcement powers and procedures.	

Policy HO11: Specialist Housing for Older and Vulnerable People

WDC Response to the Regulation 18 Consultations

Total: 94	Support: 83	Neutral: 9	Object: 2

Policy HO11: Specialist Housing for Older and Vulnerable People		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Natural England Policy needs to include require a HRA to be undertaken and appropriate mitigation provided.	• Comment noted. The Council recognises the importance of ensuring that development does not adversely affect the integrity of protected habitats sites. However, the requirement for Habitats Regulations Assessment is established through separate	Comment noted. No changes required.

	legislation and applies where proposals are likely to have a significant effect on a European site, either alone or in combination with other plans or projects. This requirement applies irrespective of whether it is specifically referenced within Policy HO11. The Council therefore considers that it is not necessary to duplicate these statutory requirements within the policy.	
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
East Sussex County Council Supportive of the policy Suggests reference to a number of documents that provide contextual information of an ageing population to support the justification of the policy.	Comment of support noted. The supporting text and evidence base for the Local Plan have been informed by a range of relevant demographic, housing, health and care evidence relating to the needs of an ageing population. While such documents provide useful context, it is not considered necessary or appropriate to reference specific documents within the policy itself, as evidence sources may be updated over time.	Comment of support noted. No changes required.
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Developers and Agents **Grosvenor Property UK Limited**	Comment of support noted. The potential of new neighbourhood northwest is considered within the	Comment of support noted. No changes required.

Supportive of the policy Potential of the new neighbourhood north west of Hailsham to cater for needs and aspirations of older people.	spatial strategy section of the Local Plan.	
South West Strategic Developments Supportive of the policy A threshold should be introduced to require provision of site of a particular sites	Comment of support noted. Policy HO11 is intended to support the delivery of specialist housing for older people and vulnerable groups where an identified need exists and does not seek to prescribe provision through site size thresholds. The need for specialist accommodation can arise on a range of development sites and in different locations across the District. The Council considers that a flexible approach is more effective in responding to identified needs and site-specific circumstances than applying a fixed threshold requirement.	Comment of support noted. No changes required.
Signature Prime Property Supportive of the policy Need to consider the impacts of an ageing population on housing needs throughout plan-making and decision-making. Policy does not sufficiently recognise the need for older persons' housing and care provision or provide indicative figures for this need. Plan should include allocations to address need	Comment of support noted. The Council recognises the importance of meeting the housing, accommodation and care needs of older people. These needs have been considered through the plan's evidence base and have informed the overall housing requirement, spatial strategy and policies relating to housing mix, specialist	Comment of support noted. No changes required.

	accommodation and healthy communities. The Council does not consider it necessary to identify indicative figures within this policy, as the need for older persons' housing is addressed through the wider evidence base and relevant Local Plan policies. The Council also notes the suggestion that specific site allocations should be included to meet these needs. The distribution of development, including any allocations for housing, has been considered through the spatial strategy and site allocation process.	
Strutt & Parker Supportive of the policy Plan should include allocations to address need	Comment of support noted. The Council notes the suggestion that specific site allocations should be included to meet these needs. The distribution of development, including any allocations for housing, has been considered through the spatial strategy and site allocation process.	Comment of support noted. No changes required.
CARE UK Supportive of the policy Policy should allow the delivery of specialist housing on allocation sites	Comment of support noted. The Council notes the suggestion that specific site allocations should be included to meet these needs. The distribution of development,	Comment of support noted. The Council has simplified criteria on car parking to align with East Sussex County Council's adopted parking standards (and any successor standards) at criteria 4.

Lack of clarity as to whether C2 in included within the policy Parking standard reference should be removed or more flexible	including any allocations for housing, has been considered through the spatial strategy and site allocation process. Policy HO11 is intended to apply to a range of specialist housing and accommodation types for older people and vulnerable groups, including supported living, extra care housing, retirement housing and residential care accommodation. The supporting text and assessment of proposals will have regard to the characteristics of the accommodation and relevant planning use classes where applicable. The Council considers that the policy provides sufficient flexibility to address both C2 and C3 specialist accommodation proposals where relevant. It is not agreed that the reference should be removed. Appropriate parking, servicing and access arrangements are important considerations for specialist housing developments. Criterion 4 requires parking provision to be made in accordance with East Sussex County Council's adopted parking standards and recognises that these standards may be updated over time. The Council	

	considers that the policy already provides sufficient flexibility to respond to the specific characteristics and needs of individual developments whilst ensuring suitable parking provision is achieved.	
Frontier Estates Supportive of the policy. Need to consider the impacts of an ageing population on housing needs throughout plan-making and decision-making. Policy does not sufficiently recognise the need for older persons' housing and care provision or provide indicative figures for this need. Plan should include allocations to address need	Comment of support noted. The Council does not consider it necessary to identify indicative figures within this policy, as the need for older persons' housing is addressed through the wider evidence base and relevant Local Plan policies. The Council also notes the suggestion that specific site allocations should be included to meet these needs. The distribution of development, including any allocations for housing, has been considered through the spatial strategy and site allocation process.	Comment of support noted. No changes required.
<u>Organisations with specific interest</u> **Clarity Ecoworks** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
CPRE Sussex Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.

Eastbourne Eco Action Network C.I.C Supportive of the policy Developments should be near shops, leisure and community resources	Comment of support noted. The Council agrees that housing for older people is most effective when located in accessible and sustainable locations with good access to shops, services, community facilities, healthcare and leisure opportunities. The spatial strategy and settlement hierarchy seek to direct development to locations where residents can access a range of facilities and services, reducing the need to travel and supporting healthy, independent living. This is addressed criteria 1b and 1d.	Comment of support noted. No changes required.
Residents Associations **Dicker Residents Association** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
The Working Group Against Over Development Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Village Concerns Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Willingdon Residents' Association Supportive of the policy Need for supported accommodation with specialist needs for physical and mental development	Comment of support noted. The Council agrees that there is need for supported accommodation with specialist needs for physical and mental health needs and this supported in HO11.	Comment of support noted. No changes required.

Parish/Town Councils	WDC Response	Proposed Changes to Policy
Hailsham Town Council Supportive of the policy Local Plan fails to allocate sites for this type of housing Policy should include locational requirement for homes for the elderly	Comment of support noted. The Council notes the suggestion that specific site allocations should be included to meet these needs. The distribution of development, including any allocations for housing, has been considered through the spatial strategy and site allocation process. The Council agrees that housing for older people is most effective when located in accessible and sustainable locations with good access to shops, services, community facilities, healthcare and leisure opportunities. The spatial strategy and settlement hierarchy seek to direct development to locations where residents can access a range of facilities and services, reducing the need to travel and supporting healthy, independent living. This is addressed criteria 1b and 1d.	
Heathfield and Waldron Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Horam Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Laughton Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.

Mayfield and Five Ashes Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Pevensey Parish Council Supportive of the policy Unclear how proposals would be treated within the development boundaries	Comment of support noted. The spatial strategy and settlement hierarchy seek to direct development to locations where residents can access a range of facilities and services, reducing the need to travel and supporting healthy, independent living. This is addressed criteria 1b and 1d.	Comment of support noted. No changes required.
Polegate Town Council Supportive of the policy Ensure greater working cooperation with the NHS and housing needs for older people.	Comment of support noted. Policy HO11 has been informed by evidence relating to housing, care and support needs and seeks to support the delivery of appropriate specialist accommodation. Ongoing engagement with the NHS, care providers and other stakeholders will continue to inform the implementation of the Local Plan and the assessment of relevant development proposals. However, detailed arrangements for inter-agency working are not matters that are generally addressed through development plan policy wording.	Comment of support noted. No changes required.
Uckfield Town Council Supportive of the policy	Comment of support noted. The spatial strategy and settlement hierarchy seek to direct development	Comment of support noted. No changes required.

Encourage development of specialist homes as well as other options such as those wishing to transition to a new home, downsize or homes with level access. Aim is to avoid isolation by creating accessible homes in small clusters or communities that encourage dependency and wellbeing.	to locations where residents can access a range of facilities and services, reducing the need to travel and supporting healthy, independent living. This is addressed criteria 1b and 1d.	
Willingdon and Jevington Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Withyham Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Specialist housing should therefore be integrated within mixed communities rather than provided separately to avoid isolating residents. Specialist housing schemes should include affordable accommodation for care workers and their families. It was noted that some older residents may wish to build smaller homes within their garden plots, enabling younger family members to occupy the main dwelling. Given limited land availability, focus should be on higher-density apartment developments for older people, supported by appropriate accessibility measures. Dedicated land needs to be identified in the plan to ensure delivery The policy's reliance on domestic support services was questioned due to an existing shortage of trained care staff.	Comment noted The Council supports the principle of integrating specialist housing within mixed and balanced communities and recognises the importance of providing a range of accommodation types to meet the needs of older people. Matters relating to tenure, affordability, housing mix, care provision, density, accessibility and the protection of specific dwelling types are addressed through the wider Local Plan framework and will be considered on a site-by-site basis where appropriate. Site allocations and the distribution of development have been determined through the spatial strategy and site selection process.	Comments noted. No changes required.

Larger residential developments should be required to provide care home facilities. Retirement accommodation to offer a mix of rental and owner-occupied options, with controls on excessive leasehold and service charges. Bungalows should be protected through planning restrictions preventing roof extensions and limiting expansion beyond three bedrooms.		
Other Comments	**WDC Response**	
None		

Policy HO12: Residential Accessibility Standards

WDC Response to the Regulation 18 Consultations

Total: 39	Support: 28	Neutral: 9	Object: 2

Policy HO12: Residential Accessibility Standards		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Natural England Policy should include access to green space for health and wellbeing	Comment noted. The Council recognises the importance of access to green space for health and wellbeing. However, the purpose of Policy HO12 is to secure accessible and adaptable housing standards. Access to green	Comment noted. No changes required.

	infrastructure, open space and recreational facilities is addressed through other relevant Local Plan policies.	
National Highways Supportive of the policy Policy should make reference to designing communities in accordance with Manual for Streets and Local Transport Note.	Comment of support noted. The Council recognises the importance of creating accessible, inclusive and well-connected environments that support active travel and independent living. However, these matters are addressed through wider Local Plan design, transport and active travel policies, together with relevant national guidance and standards. It is not considered necessary to reference specific guidance documents within Policy HO11, particularly as such documents may be updated during the plan period.	Comment noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Developers and agents</u> **Hertfordshire Holdings** Development need to meet building regulations Need for evidence and consistency with government response to raising standards Viability implications should be considered	Comment noted. The Council agrees that residential development should comply with relevant Building Regulations and that accessibility requirements should be supported by appropriate evidence. Policy HO12 has been informed by	Comment noted. No changes required.

	evidence of need in the LHNA and reflects current national policy and standards relating to accessible and adaptable housing. The Council also recognises the importance of viability considerations and has included an exception mechanism where robust evidence demonstrates that compliance would be impracticable or unviable.	
Landspeed Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Taylor Wimpey UK Ltd Unreasonable to expect all development to meet M4(2) standards due to space implications Inconsistent with PPG	Policy seeks to ensure that new homes are accessible and adaptable in order to meet the changing needs of residents over their lifetime and to respond to identified demographic and housing needs. The accessibility standards proposed have been informed by evidence and are considered necessary to support inclusive and sustainable communities. The Council considers that the requirements strike an appropriate balance between accessibility objectives and development viability. The Council does not agree that Policy HO12 is inconsistent with Planning Practice Guidance. The policy has been prepared having regard to	Comment noted. No changes required.

	national policy and guidance, including the evidence-based approach required when applying accessible and adaptable housing standards. The Council's evidence demonstrates a need for accessible homes and supports the proposed policy approach.	
Vistry Group Supportive of the policy subject to viability	Comment of support noted.	Comment of support noted. No changes required.
<u>Organisation with specific interest</u> **Clarity Ecoworks** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
<u>Registered Providers</u> **Hastoe Housing Association** To deliver these as shared ownership units would require flexibility of tenure, and early marketing/identification of need and a suitable occupant.	Policy HO12 is intended to provide a framework for delivering accessible and adaptable homes that meet identified needs, while allowing sufficient flexibility to respond to site-specific circumstances and housing market conditions. Matters relating to tenure delivery, marketing and occupier identification are generally addressed through the development management process and discussions with registered providers and housing partners.	Comment noted. No changes required.
Orbit Home The 10% M4(3) requirement should be flexible if a particular tenant hasn't been identified.	The requirement for a proportion of M4(3) wheelchair user dwellings is based on identified current and	Comment noted. No changes required.

	future needs for accessible housing across the District and is intended to ensure an adequate supply of suitable homes is available when required. The Council considers that planning for wheelchair user housing should not be dependent solely on a named occupier being identified at the time of application. However, the detailed delivery of M4(3) homes may be considered having regard to the nature of the development, evidenced needs and relevant policy requirements.	
Town and Country Housing Clarity required on M4(3) 'accessible' or 'adaptable'	This has been clarified within the Regulation 19 version of the Local Plan policy.	Comment noted. Clarification has been provided on M4(3) 'accessible' or 'adaptable' within the Regulation 19 policy at criteria 2 and 3.
Residents Association **Dicker Residents Association** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Village Concerns Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Heathfield and Waldron Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Hellingly Parish Council	• Compliance with accessible and adaptable housing standards,	Comment noted. No changes required.

• Question who will monitor the building control for this policy.	including M4(2) and M4(3) requirements where secured through planning permission, is monitored through the planning and building control processes. Building Control is responsible for assessing compliance with the relevant Building Regulations standards, while the Council, in its role as Local Planning Authority, monitors compliance with planning conditions and obligations where applicable. The Council is satisfied that appropriate mechanisms are in place to ensure the policy can be implemented effectively.	
Horam Parish Council Supportive of the policy Proposes rewording criteria 3 of policy to prevent developers not providing accessible housing due to viability.	Comment of support noted. Policy HO12 already requires a proportion of affordable housing to be provided as wheelchair accessible dwellings and includes an exception mechanism only where robust evidence demonstrates that compliance would be impracticable or unviable. The Council considers the existing wording provides an appropriate balance between securing accessible housing and ensuring development remains deliverable.	Comment noted. No changes required.

Laughton Parish Council Supportive of the policy The standards should also apply when annexes are built for elderly relatives and holiday lets.	Comment of support noted. Policy HO12 applies to the provision of new dwellings and is intended to secure accessible and adaptable housing in line with identified needs and national standards. Annexes and holiday accommodation are subject to different functional and policy considerations, and the Council does not consider it appropriate to extend the requirements of this policy to such forms of development.	Comment noted. No changes required
Mayfield and Five Ashes Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Polegate Town Council Supportive of the policy Ensure cooperation with the NHS for housing needs.	Comment of support noted.	Comment of support noted. No changes required.
Rotherfield Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Uckfield Town Council Policy provides developers with a caveat if financial viability doesn't allow for a proportion of the units to be built. Policy needs to provide for enforcement powers or make the standards mandatory.	The viability provisions within Policy HO12 recognise that there may be exceptional circumstances where the full policy requirements cannot be achieved. This approach is intended to ensure that development remains deliverable whilst still seeking to maximise the provision of accessible and adaptable housing. Any departure from policy requirements would need to be	Comment noted. No changes required.

	supported by robust evidence and assessed on its merits. Policy HO12 sets out the accessibility standards expected of new development and, where secured through planning permissions, conditions or legal agreements, compliance can be monitored through the planning and building control processes. Enforcement powers are established through planning and building control legislation rather than Local Plan policy. The Council therefore considers that additional policy wording is not necessary.	
Withyham Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
A higher percentage of wheelchair accessible accommodation is required for the future and developers should not be given an exemption. Proposes rewording of criteria 3 of the policy to prevent developers not providing accessible housing due to viability. All affordable dwellings should be 100% accessible. Accessibility needs to be included on the areas marked for development, there is no indication on the site allocations how these will be accessed.	The Council recognises the importance of delivering accessible and adaptable housing to meet current and future needs. Policy HO12 has been informed by evidence of need and seeks to secure an appropriate proportion of accessible and wheelchair user dwellings whilst maintaining development deliverability. The policy requirements apply alongside wider design, accessibility and site	Comment noted. No changes required.

	allocation policies, which address access to and within development sites. The Council considers that the proposed requirements strike an appropriate balance between meeting accessibility needs and ensuring development remains viable and deliverable.	
Other Comments	**WDC Response**	
None		

Policy HO13: Internal Residential Space Standards for New Dwellings

WDC Response to the Regulation 18 Consultations

Total: 36	Support: 27	Neutral: 3	Object: 6

Policy HO13: Internal Residential Space Standards for New Dwellings		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
None		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Developers and agents	The Council recognises that the application of the Nationally	Comment noted. No changes required.

Gladman Developments Limited The Council should provide clear and robust evidence to justify requiring the Nationally Described Space Standards (NDSS). Viability testing should be undertaken to assess the impact of applying the standards. The policy must demonstrate compliance with Planning Practice Guidance requirements relating to need, viability and affordability.	Described Space Standards (NDSS) must be supported by appropriate evidence and consideration of viability, in accordance with national policy and Planning Practice Guidance. The requirement for NDSS has been informed by the Local Plan evidence base, including identified housing needs and expected living standards. Viability implications have been considered through the plan-making process, and the Council is satisfied that the policy is justified and deliverable.	
Landspeed Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Reinard Properties Limited Raised an objection due to lack of evidence or justification provided to support adoption of the optional standards.	The Council recognises that the application of the NDSS must be supported by appropriate evidence and consideration of viability, in accordance with national policy and Planning Practice Guidance. The requirement for NDSS has been informed by the Local Plan evidence base, including identified housing needs and expected living standards. Viability implications have been considered through the plan-making process, and the Council is satisfied	Comment noted. No changes required.

	that the policy is justified and deliverable.	
Trafalgar Group Limited Lack of evidence to justify adopting the options standard The standards are already a statutory requirement and should not be repeated in the Local Plan	The Council recognises that the application of the NDSS must be supported by appropriate evidence and consideration of viability, in accordance with national policy and Planning Practice Guidance. The requirement for NDSS has been informed by the Local Plan evidence base, including identified housing needs and expected living standards. Viability implications have been considered through the plan-making process, and the Council is satisfied that the policy is justified and deliverable.	Comment noted. No changes required.
Vistry Group Raised an objection due to lack of evidence or justification provided to support adoption of the optional standards.	The Council recognises that the application of the NDSS must be supported by appropriate evidence and consideration of viability, in accordance with national policy and Planning Practice Guidance. The requirement for NDSS has been informed by the Local Plan evidence base, including identified housing needs and expected living standards. Viability implications have been considered through the plan-making process, and the Council is satisfied	Comment noted. No changes required.

	that the policy is justified and deliverable.	
Registered Providers **Hastoe Housing Association** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Hyde Housing Supportive of the policy The Council should make sure they have the capacity and resource to monitor this policy.	Comment of support noted. The implementation and monitoring of Policy HO13 will be undertaken through the Council's established planning, housing and building control functions, supported by the Authority Monitoring Report (AMR) and other monitoring mechanisms where appropriate. The Council is satisfied that suitable processes are in place to monitor the effectiveness of the policy and assess compliance with its requirements.	Comment of support noted. No changes required.
Orbit Homes Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Organisations with specific interest **Clarity Ecoworks** Supportive of the policy.	Comment of support noted.	Comment of support noted. No changes required.
Home Builders Federation	The Council recognises that the application of the NDSS must be supported by appropriate evidence	Comment noted. No changes required.

Policy should be deleted due to a lack of evidence demonstrating a need for minimum space standards in Wealden. Considered the Council's justification insufficient, as no evidence has been provided to show that new homes are being delivered below NDSS.	and consideration of viability, in accordance with national policy and Planning Practice Guidance. The requirement for NDSS has been informed by the Local Plan evidence base, including identified housing needs and expected living standards. The purpose of the policy is not solely to address existing instances of homes being delivered below the NDSS, but to ensure that future development provides an appropriate standard of accommodation and living environment for occupiers. Viability implications have been considered through the plan-making process, and the Council is satisfied that the policy is justified and deliverable.	
Residents Associations **Dicker Residents Association** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Village Concerns Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Heathfield & Waldron Parish Council Supportive of the policy Typing error in title of the policy	Comment of support noted. The title error has been rectified.	Comment of support noted. No changes required.

Horam Parish Council Supportive of the policy The storage capacity should be cubic metres not square metres.	Comment of support noted. Comment noted. The policy relates to residential floorspace standards and these are described as such within the NDSS.	Comment of support noted. No changes required.
Laughton Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Mayfield and Five Ashes Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Polegate Town Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Rotherfield Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Uckfield Town Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Withyham Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
The national minimum space standards are too low and could result in cramped homes. The Council should adopt higher space standards As a rural district, Wealden should aim for high-quality, spacious housing rather than minimum standards. All new homes should be required to meet minimum space standards without exception. The policy only addresses floor area and should also consider factors such as ceiling heights and overall living volume. Open-plan homes can require more energy to heat and insulate effectively.	Policy HO13 requires compliance with the Nationally Described Space Standard (NDSS), which provides a nationally recognised benchmark for internal space provision. The Council considers that this represents an appropriate and evidence-based approach to securing good quality residential environments across the District. Matters such as private amenity space, design quality, energy efficiency, layout and garden provision are addressed through	Comment noted. No changes required.

Support provided that national space standards are not reduced or undercut. Need for effective monitoring and enforcement of the standards, including where CIL is not applicable The policy does not address private garden sizes. Larger family homes should have minimum garden length requirements.	other policies within the Local Plan. Monitoring and compliance will be undertaken through the planning and building control processes where relevant. The Council considers the policy to be justified, effective and consistent with national policy.	
Other Comments	**WDC Response**	
None		

Policy HO14: Rural Workers Accommodation

WDC Response to the Regulation 18 Consultations

Total: 46	Support: 33	Neutral: 5	Object: 8

Policy HO14: Rural Workers Accommodation		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Natural England The policy should include a requirement to ensure no impacts to biodiversity.	• The Council agrees that protection and enhancement of biodiversity are important considerations in the assessment of rural workers' accommodation. However, biodiversity impacts are addressed through other policies in the Local	Comment noted. No changes required.

	Plan and relevant national requirements, which apply to all development proposals. The Council does not consider it necessary to duplicate these requirements within Policy HO14.	
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Developers and agents</u> **Batcheller Monkhouse** Criteria 6a and 6c relate to the same objective. Criteria a should be removed Criteria c should be altered to be a valuation of the agricultural occupancy dwelling as a more reliable indicator of affordability and viability than the marketing exercises alone Criteria 7 should be removed as it is an unreasonable financial burden for rural workers Criteria 8 is unrealistic particularly in isolated farmyard locations	The Council notes this comment. Whilst criteria 6(a) and 6(c) of the previous draft (now criteria 4 and 4c) both contribute towards assessing the continued need and viability of the agricultural occupancy dwelling, they consider different matters and provide complementary evidence. The Council therefore considers both criteria necessary, albeit this has been simplified. Marketing evidence provides an established and transparent means of assessing demand for occupancy-restricted dwellings. The Council considers that the policy requirements provide an appropriate basis for assessing proposals, although valuation evidence may also be submitted where relevant. Criterion 7 (now criterion 5) is intended to ensure that proposals are	Comment noted. Clarification has been provided around the tests need to remove agricultural occupancy condition and these are drafted in criterion 4. Criterion 8 of the former draft policy has been removed.

	supported by sufficient evidence to justify the removal or variation of occupancy restrictions and to safeguard the stock of housing available to support rural businesses and workers. The Council considers this requirement to be reasonable and proportionate. Criterion 8 has been removed.	
Organisation with specific interests **CPRE Sussex** Supportive of the policy Support the retention of rural workers' accommodation to prevent conversion to market housing through subsequent development or change of use. Considered this to be an appropriate safeguard against abuse of the policy. Suggested the policy should be amended to ensure that mixed-use proposals involving animal husbandry are not used to introduce inappropriate commercial, leisure or other uses that conflict with the policy objectives.	Comment of support noted. The purpose of the policy is to ensure that development associated with animal husbandry remains appropriate to its rural context and supports the objectives of the rural economy and countryside policies. Any ancillary commercial, leisure or other uses proposed as part of a mixed-use development would be assessed against the relevant policies of the Local Plan, including those relating to the countryside, rural character, amenity and sustainable development. The Council considers that the existing policy framework provides sufficient safeguards against inappropriate development.	Comment noted. No changes required.
Wealden Food Partnership Supportive of the policy	Comment of support noted.	Comment noted. No changes required.

Rural workers' accommodation should be consider under a faster planning process Importance of providing more than one dwelling on farms to support succession and retirement planning Smaller accommodations should be provided for apprentices and young agricultural workers	The determination of planning applications is governed by national legislation and procedural requirements and cannot be expedited through Local Plan policy. The policy provides the framework for assessing proposals for rural workers' accommodation, while decisions will continue to be made in accordance with statutory timescales and procedures. The Council recognises that farm businesses may have evolving accommodation needs associated with succession planning, retirement and the ongoing operation of agricultural enterprises. The policy allows proposals to be considered on their individual merits, having regard to the functional and financial needs of the enterprise and other relevant policy considerations. The policy does not prescribe the size or type of accommodation, allowing proposals to respond to identified operational needs and the circumstances of individual rural enterprises. The Council considers that this flexible approach is appropriate.	

Residents Associations **Dicker Residents Association** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Rotherfield Protection Group Supportive of the policy Considered that where the original rural worker need no longer exists, such dwellings should continue to meet wider local affordable housing needs rather than becoming unrestricted market housing. Criteria 1f is weaker than the wording from 1998 Wealden Local Plan.	Comment of support noted. The policy seeks to retain occupancy restrictions where there remains a demonstrable need for rural workers' accommodation. Where such a need no longer exists, proposals will be assessed against the policy criteria and the wider objectives of the Local Plan. The Council does not consider it appropriate to require all former rural workers' dwellings to become affordable housing, as this may not be justified or deliverable in every circumstance. Policy wording has been reviewed and updated to reflect current national policy, legislation and evidence. It provides an appropriate and robust basis for assessing proposals whilst remaining effective and consistent with the wider Local Plan framework.	Comment of support noted. No changes required.
The Working Group Against Over Development Supportive of the policy Stronger control are needed to prevent missed-use proposals introducing inappropriate commercial, leisure or other non-rural uses.	Comment of support noted. The policy is intended to support development that is genuinely required for rural and agricultural purposes. Any commercial, leisure or other non-rural elements proposed	Comment of support noted. No changes required.

	as part of a mixed-use scheme would be assessed against the relevant policies of the Local Plan, including those relating to the countryside, rural character, landscape impact, amenity and sustainable development. The Council considers that the existing policy framework provides sufficient safeguards to prevent inappropriate uses from being introduced under the guise of mixed-use rural development.	
Village Concerns Supportive of the policy Agreed that rural workers' accommodation should be protected to prevent future redevelopment or changes of use that would undermine its original purpose.	Comment of support noted.	Comment of support noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Arlington Parish Council Supportive of the policy Isolated rural dwellings may be unattractive to affordable housing providers Supported flexibility to allow tied accommodation to be used for short-term rentals when not required for agricultural workers, helping support the local agricultural economy.	Comment of support noted. Criterion 8 of the previous draft policy has been deleted. The primary purpose of rural workers' dwellings is to meet the identified needs of rural enterprises and agricultural workers. Allowing unrestricted short-term rental use could undermine the availability of accommodation for its intended purpose. Proposals seeking	Comment of support noted. Criterion 8 of the former draft policy has been removed.

	alternative uses would be assessed against the relevant policy criteria and other applicable Local Plan policies.	
Chalvington with Ripe Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Heathfield and Waldron Parish Council Supportive of the policy Objected to requiring dwellings to remain affordable housing in perpetuity if occupancy restrictions are removed, considering isolated rural locations unsuitable for affordable housing. Criteria 1c require clarification of the term 'vicinity'	Comment of support noted. Criterion 8 of the previous draft policy has been deleted. Criterion 1(b) of the policy (previously criterion 1(c) has been amended for clarity to state 'nearby', but this will be considered on a case-by-case dependant on the agricultural enterprise.	Comment of support noted. Criterion 8 of the former draft policy has been removed. Criterion 1(c) has been updated to provide clarity in relation these comments.
Horam Parish Council Objected to the policy requirement for dwellings to remain affordable housing in perpetuity following removal of a rural occupancy condition. a minimum ten-year period before occupancy restrictions can be removed. Proposed a financial contribution, similar to CIL, when occupancy restrictions are lifted, to support affordable housing provision elsewhere and discourage abuse of the policy.	Comment of support noted. Criterion 8 of the previous draft policy has been deleted. The Council does not consider it necessary or justified to impose a minimum ten-year period before an occupancy restriction can be reviewed or removed. Policy HO14 already sets out robust criteria that must be satisfied before the removal of an occupancy restriction will be considered. The Council also does not support the introduction of a financial contribution mechanism linked to	Comments noted. Criterion 8 of the former draft policy has been removed.

	the removal of occupancy restrictions. Such an approach is not necessary to achieve the objectives of the policy, and applications to remove occupancy conditions can be assessed against the evidence requirements set out in the policy.	
Isfield Parish Council Supportive of the policy Requested stronger safeguards to ensure mixed-use proposals are not used to introduce inappropriate commercial, leisure or other non-rural uses.	Comment of support noted. The policy is intended to support development that is genuinely required for rural and agricultural purposes. Any commercial, leisure or other non-rural elements proposed as part of a mixed-use scheme would be assessed against the relevant policies of the Local Plan, including those relating to the countryside, rural character, landscape impact, amenity and sustainable development. The Council considers that the existing policy framework provides sufficient safeguards to prevent inappropriate uses from being introduced under the guise of mixed-use rural development.	Comment of support noted. No changes required.
Laughton Parish Council Supportive of the policy Supported retaining dwellings as affordable housing in perpetuity but questioned its	Comment of support noted. Criterion 8 of the previous draft policy has been deleted. The Council agrees that proposals for new rural workers' dwellings should	Comments noted. Criterion 8 of the former draft policy has been removed.

practical deliverability in isolated rural locations. Crucially important to robustly challenge business models put forward in the first place to justify any new AO dwelling Considered planning obligations should be strongly enforced, particularly where changes to farm holdings affect business viability.	be supported by robust evidence demonstrating a genuine functional and financial need. The policy requires applications to be accompanied by appropriate evidence to justify the need for a dwelling, and proposals will be carefully assessed against the policy criteria and other relevant considerations. The Council considers that the policy provides an appropriate framework for scrutinising the need for new agricultural worker dwellings. The Council recognises the importance of ensuring that occupancy restrictions and planning obligations remain effective in securing the intended purpose of rural workers' dwellings. Compliance with planning conditions and legal agreements will continue to be monitored and enforced through the Council's established planning enforcement procedures where necessary.	
Mayfield and Five Ashes Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Polegate Town Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Rotherfield Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.

Concerns over the lack of enforcement.	Compliance with planning conditions, occupancy restrictions and legal agreements associated with rural workers' dwellings will continue to be monitored through the Council's established planning enforcement procedures. Where breaches are identified, the Council has powers to investigate and, where appropriate, take enforcement action.	
Uckfield Town Council Supportive of the policy Consideration should be given to sustainability and accessibility of locations for reverted dwellings Para 8.121 – disagree with statement, this element lacks flexibility	Comment of support noted. Criterion 8 of the previous draft policy has been deleted based on these concerns.	Comments noted. Criterion 8 of the former draft policy has been removed.
Westham Parish Council Supportive of the policy Disagree with the removal of rural occupancy requirement before 50 years to prevent abuse of this condition for new buildings	Comment of support noted. The Council does not consider it necessary or justified to impose a minimum fifty-year period before an occupancy restriction can be reviewed or removed. Policy HO14 already sets out robust criteria that must be satisfied before the removal of an occupancy restriction will be considered.	Comment of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**

General support was expressed for the policy and for retaining rural workers' dwellings for their intended purpose. Many respondents supported requiring dwellings to remain as affordable housing in perpetuity if a rural occupancy condition is removed, to prevent the loss of rural housing stock and speculative conversion to market housing. Concerns were raised about the enforceability of requiring former rural workers' dwellings to remain affordable housing in perpetuity, particularly in isolated rural locations. Some respondents considered affordable housing requirements inappropriate because agricultural occupancy dwellings were originally approved to meet operational business needs rather than affordable housing needs. Concerns were raised about the limited demand for isolated rural affordable housing and the likelihood that registered providers would be unwilling to acquire or manage individual dwellings. Several respondents questioned whether rural dwellings are suitable affordable housing due to limited access to services, public transport, schools and employment. A suggestion was made that if an occupancy condition is no longer justified and affordable use is not appropriate, the dwelling should be demolished.	The Council welcomes support for the policy's objectives. The policy seeks to safeguard rural workers' accommodation where there remains a demonstrable need, whilst providing a robust framework for assessing proposals to remove occupancy restrictions. The Council considers that the policy contains appropriate safeguards and that matters relating to enforcement, succession planning and occupancy restrictions are adequately addressed through the policy and wider planning legislation. The policy seeks to balance the retention of valuable rural housing stock with the realities of rural housing delivery and occupancy. Proposals will be considered on a case-by-case basis having regard to local circumstances, evidence of need and the objectives of the policy. The Council considers the proposed approach remains appropriate. The policy has been drafted to provide sufficient flexibility to accommodate a range of rural enterprises whilst ensuring proposals are supported by robust evidence. Relevant terms are interpreted in the context of national policy, legislation and planning	Comments noted. No changes required.

Suggestions were made that, instead of retaining dwellings as affordable housing, owners should make a financial contribution towards affordable housing elsewhere when occupancy restrictions are removed. A proposal was made to require a minimum occupation period (e.g. ten years) before a rural occupancy condition can be lifted, to prevent abuse of the policy. Concerns were raised that previous agricultural occupancy conditions have not always been properly enforced and that stronger enforcement mechanisms are needed. Some respondents argued that the policy should include safeguards to prevent additional dwellings being built through successive applications that circumvent normal planning controls. Requests were made for clearer definitions of terms such as "rural worker", "rural enterprise" and "rural business" to avoid ambiguity and potential misuse of the policy. It was suggested that the policy should be restricted specifically to agricultural and other land-based rural occupations rather than applying more broadly to any rural employment. Concerns were raised that mixed-use proposals involving animal husbandry could be used to introduce inappropriate commercial, leisure or other unrelated uses in the countryside.	practice, and proposals will be assessed on their individual merits. The Council considers the policy wording to be sufficiently clear and effective.	

Questions were raised about the assessment of farm business viability, with concerns that taxable profits may not always accurately reflect the financial strength of agricultural businesses. Respondents highlighted practical issues associated with mortgage availability, ownership arrangements and regulation of affordable housing in former agricultural occupancy dwellings. Some considered that making dwellings affordable housing could result in properties becoming vacant, occupancy conditions being breached, or applications being made to remove restrictions altogether. Concerns were raised regarding the size of some rural workers' dwellings that have subsequently had occupancy conditions removed, with suggestions that this has contributed to shortages of smaller homes. Respondents requested that the policy allow flexibility for permitted development rights and differing operational requirements across rural businesses. Concerns were raised that references to monitoring technologies such as CCTV may place excessive reliance on technology and fail to reflect the need for physical on-site presence during livestock care. Some respondents argued that the policy should better support farm diversification, family		

succession planning and the ability for younger generations or farm workers to live on-site. Requests were made to retain established agricultural occupancy provisions allowing retired agricultural workers and those last employed in agriculture to continue occupying dwellings. Concern was expressed that applicants may be required to fund independent assessments without sufficient transparency regarding costs and methodology. Some respondents suggested the marketing requirement for demonstrating lack of demand is excessive and should be reduced, with one respondent supporting a one-year marketing period.		
Other Comments	**WDC Response**	
None		

Policy HO15: Conversion of Rural Buildings to a Residential Use

WDC Response to the Regulation 18 Consultations

Total: 93	Support: 74	Neutral: 2	Object: 17

Policy HO15: Conversion of Rural Buildings to a Residential Use		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Natural England Wording should be added to policy to ensure protected species and birds are not adversely impacted.	• The Council agrees that the protection of biodiversity, including protected species and birds, is an important consideration in assessing proposals for the conversion of rural buildings. However, criterion 1(d) already requires proposals to avoid unacceptable harm to biodiversity, and relevant biodiversity policies elsewhere in the Local Plan, together with national legislation, apply to all development proposals. The Council therefore considers that biodiversity impacts are adequately addressed within the policy framework.	Comment noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**

<u>Developers and agents</u> **Batcheller Monkhouse** Objected to requiring business, recreation or tourism uses to be considered before residential conversion, considering this inconsistent with the NPPF. Criteria j places an unreasonable burden on landowners to provided sustainable transport solutions in rural locations Policy creates an inconsistency in decision making between areas where GDPO applies and areas where it does not.	• The Council considers that requiring applicants to demonstrate that suitable business, recreation or tourism uses have been considered before residential conversion is consistent with the objective of supporting the rural economy and making effective use of existing buildings. The policy seeks to ensure that opportunities for employment and economic activity are not lost without appropriate justification. • The policy does not require applicants to provide extensive transport solutions but seeks to ensure that proposals are considered in the context of their accessibility and sustainability, having regard to site-specific circumstances. • The policy applies only to development requiring planning permission and does not alter the operation of national permitted development rights.	Comment noted. No changes required.
Firle Estate Business and tourism uses are not always the most appropriate use for agricultural buildings and should depend on site-specific circumstances	The Council considers that requiring applicants to demonstrate that suitable business, recreation or tourism uses have been considered before residential conversion is consistent with the objective of	Comment noted. No changes required.

Requested simplification and more positive wording of the policy	supporting the rural economy and making effective use of existing buildings. The policy seeks to ensure that opportunities for employment and economic activity are not lost without appropriate justification. Policy HO15 has been drafted to provide a clear and comprehensive framework for assessing proposals for the conversion of rural buildings to residential use, ensuring that impacts on the countryside, heritage assets, biodiversity, rural businesses and residential amenity are appropriately considered. The Council considers that the policy achieves an appropriate balance between supporting suitable conversions and protecting the character and function of the rural area.	
Landspeed Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Nevill Estate Company Supportive of the policy 18-month marketing period excessive and suggested reducing it to 9 months.	Comment of support noted. The marketing period for policy HO8 is intended to provide robust evidence that there is no reasonable demand for the building to remain in, or be reused for, an employment, tourism or other appropriate rural economic use before residential conversion is	Comment of support noted. No changes required.

	permitted. The Council considers that an 18-month period provides a reasonable and reliable basis for assessing market demand and reflects the particular characteristics of rural property markets.	
South West Strategic Developments Marketing requirements unnecessary given existing Class Q and Class R permitted development rights.	The Council acknowledges that permitted development rights under Class Q and Class R provide alternative routes for certain changes of use. However, where planning permission is required, the Council considers it appropriate to seek evidence that alternative business, recreation or tourism uses have been adequately explored before the loss of rural buildings to residential use is supported. This helps safeguard opportunities to support the rural economy and is consistent with the objectives of the Local Plan.	Comment noted. No changes required.
The Estate of Jill Pillips Insufficient justification for prioritising economic uses over residential uses. Criteria i and j are unreasonable barriers to delivery. policy overly complex and insufficiently positive in its wording	Rural buildings can make an important contribution to the rural economy through employment, tourism and other business uses. The policy seeks to ensure that potentially valuable rural economic assets are not lost to residential use without first demonstrating that there is no reasonable prospect of their	Comment noted. No changes required.

	continued or alternative economic use. This approach supports the wider objectives of the Local Plan and national policy. Policy HO15 has been drafted to provide a comprehensive framework for assessing proposals for the conversion of rural buildings to residential use whilst safeguarding the character of the countryside, rural economy and historic environment. The Council considers that the policy provides clear support for appropriate conversions and is consistent with national policy.	
The Marquess of Abergavenny 9-month marketing period would be more reasonable	The marketing period for policy HO8 is intended to provide robust evidence that there is no reasonable demand for the building to remain in, or be reused for, an employment, tourism or other appropriate rural economic use before residential conversion is permitted. The Council considers that an 18-month period provides a reasonable and reliable basis for assessing market demand and reflects the particular characteristics of rural property markets.	Comment noted. No changes required
Organisations with specific interests	Comment of support noted.	Comment of support noted. No changes required.

Clarity Ecoworks Supportive of the policy		
CPRE Sussex Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Residents Associations **Dicker Residents Association** Supportive of the policy Agricultural buildings should be considered for business and tourism purposes before residential as it contributes to the local economy.	Comment of support noted.	Comment of support noted. No changes required.
The Working Group Against Over Development Supportive of the policy Requested removal of permitted development rights for any dwellings approved under the policy.	Comment of support noted. Criterion 1(f) already provides for the use of planning conditions, including the removal of permitted development rights, where necessary to limit domestic paraphernalia, extensions, outbuildings and other alterations that could harm rural character, the historic farmstead hierarchy or the wider countryside. The Council considers that such restrictions should be applied on a case-by-case basis where justified, rather than automatically to all dwellings approved under the policy.	Comment of support noted. No changes required.
Village Concerns Supportive of the policy Employment opportunities should be retained in rural areas	Comment of support noted.	Comment of support noted. No changes required.

Parish/Town Councils	WDC Response	Proposed Changes to Policy
Chalvington With Ripe Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Frant Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Heathfield and Waldron parish Council Supportive of the policy Criteria h is too restrictive Adequate garden provision should be allowed, particularly for rural workers' family accommodation	Comment of support noted. The Council recognises the importance of providing an appropriate standard of accommodation for rural workers and their families, including suitable private amenity space. However, the amount of garden provision required will depend on the scale and nature of the dwelling and its setting. The Council considers that these matters can be assessed on a site-specific basis through the development management process.	Comment of support noted. No changes required.
Horam Parish Council Phrase "where appropriate" should be removed to strengthen controls on hard surfacing and protect rural character	Criterion 1(f) already seeks to ensure that residential curtilage, hardstanding, ancillary structures and domestic paraphernalia are limited to what is reasonably required and conserve rural character. The Council considers that the existing wording provides an appropriate balance between protecting the countryside and allowing flexibility where justified.	Comment noted. No changes required

Isfield Parish Council Supportive of the policy	• Comment of support noted.	Comment of support noted. No changes required.
Laughton Parish Council Supportive of the policy "Sustainable location" and "safe transport options" should be defined Criterion b could result in redundant infrastructure and utility buildings remaining unused	Comment of support noted. The concepts of sustainable locations and safe transport options are established through national policy and are considered through the Local Plan as a whole, having regard to the characteristics of individual sites and their accessibility to services and facilities. The Council does not consider further definitions within this policy necessary. The Council notes this concern. Criterion 1(b) seeks to ensure that buildings which may have value for employment, tourism, recreational or other rural economic uses are not lost prematurely to residential conversion. The policy does not preclude residential conversion where it can be demonstrated that there is no reasonable prospect of an appropriate economic use. The Council considers this approach provides an appropriate balance between supporting the rural economy and enabling suitable residential conversions.	Comment of support noted. No changes required.
Mayfield and Five Ashes Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.

Pevensey Parish Council Viability assessment should be carried before conversion to residential use is permitted.	Comment noted and this policy supports the comment made.	Comment noted. No changes required.
Polegate Town Council Agricultural buildings should first consider business and tourism uses before residential.	Comment noted and this policy supports the comment made.	Comment noted. No changes required.
Rotherfield Parish Council Supportive of the policy Ambiguities where rural buildings are not viable for business or tourism uses. a Supplementary Planning Document (SPD) should provide further guidance and detail	Comment of support noted. Criterion 1(b) is intended to ensure that residential conversion is only supported where there is no reasonable prospect of the building continuing in, or being reused for, an employment, tourism, recreational or other appropriate rural economic use. The assessment of viability and demand will be considered on a case-by-case basis having regard to the evidence submitted. The Council considers the policy provides a clear and appropriate framework for this assessment. Policy HO15 is considered sufficiently clear to guide the assessment of proposals. The preparation of supplementary guidance may be considered separately by the Council in the future if required, but it is not necessary for the effectiveness of the policy.	Comment noted. No changes required.
Uckfield Town Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.

Westham Parish Council Residential development should be the priority use for rural building conversions	Whilst the conversion of rural buildings to residential use can make a positive contribution to housing supply, rural buildings can also provide important opportunities for employment, tourism, recreational and other rural economic uses. Policy HO15 seeks to ensure that potentially valuable rural economic assets are retained where there is a reasonable prospect of their continued or alternative economic use, consistent with the objectives of supporting a sustainable rural economy. Residential conversion will be supported where it has been demonstrated that there is no reasonable prospect of an appropriate economic use and the other criteria of the policy are met.	Comment noted. No changes required.
Withyham Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Strong support was expressed for retaining employment opportunities in rural areas and prioritising business and tourism uses where appropriate. Others argued that residential use should be given equal weight to business and tourism uses, particularly where there is a local housing need	The Council acknowledges these differing views. Policy HO15 seeks to balance the need to support the rural economy with the re-use of suitable rural buildings for housing. The policy allows residential conversions where there is no reasonable prospect of an appropriate economic use and the	Comment noted. No changes required.

or where the building is in a sustainable location. Concern was raised that prioritising business and tourism uses over housing may be unjustified and could unnecessarily restrict the delivery of new homes. Several respondents highlighted the need to balance local economic needs against housing needs when considering building conversions. Concerns were raised that converting buildings still occupied or used by existing businesses could cause disruption to ongoing operations. Some respondents felt the policy is overly restrictive and could discourage the beneficial reuse of redundant rural buildings. It was suggested that all proposals should be assessed on a case-by-case basis rather than relying on predetermined assumptions about preferred uses. Support was expressed for ensuring conversions make effective use of existing buildings and help reduce pressure for development on greenfield sites. Concerns were raised that policy criterion b could result in redundant rural infrastructure deteriorating further if conversion opportunities are restricted. Several respondents objected to the proposed 18-month marketing period for alternative uses, suggesting that 9 months would be more reasonable.	other policy criteria are met. The Council considers this remains an appropriate and balanced approach. The marketing requirement is intended to provide robust evidence that there is no reasonable prospect of an appropriate economic use before residential conversion is supported. The Council considers that the policy provides sufficient flexibility whilst ensuring decisions are evidence-based. The policy is intended to be applied alongside national policy, legislation and relevant supporting guidance. The Council considers that the policy wording provides a sufficiently clear framework for the assessment of proposals. The Council agrees that conversions should conserve rural character and avoid adverse impacts on landscape, biodiversity and heritage significance. These matters are addressed through criteria 1(d) and 1(f), together with other relevant Local Plan policies. The Council considers that appropriate safeguards are already in place. Affordable housing, biodiversity, housing standards and other related matters are addressed through separate	

Requests were made for clearer definitions within the policy, including: What constitutes a "recently built" agricultural building. Whether "agricultural buildings" should instead be referred to as "redundant" or "disused" buildings. Clarification of the policy approach towards Atcost barns. Suggestions were made that applicants should demonstrate buildings have genuinely been used for their original agricultural purpose in order to prevent abuse of planning controls. Concerns were raised regarding permitted development rights for agricultural buildings and how these interact with the policy. Some respondents considered that residential conversions should remain in keeping with the rural environment and should not adversely affect local character or quality of life. Requests were made to ensure converted buildings, whether residential or commercial, remain linked to the associated landholding to support long-term stewardship and management. Concerns were raised about restrictions on residential curtilages and parking areas, with	policies within the Local Plan. Policy HO15 is intended specifically to assess the principle and impacts of converting rural buildings to residential use. The Council considers that additional requirements are not necessary.	

some considering the proposed approach too restrictive. Suggestions were made to include affordable housing requirements or limits on bedroom numbers within converted buildings. Respondents highlighted the need to consider biodiversity net gain and appropriate mitigation measures when assessing conversions. Some comments sought stronger controls on hard surfacing and associated domestic paraphernalia to help preserve rural character. Concerns were expressed that policy wording in supporting paragraphs is overly negative towards residential conversions and should provide greater encouragement for the reuse of agricultural buildings. Several respondents emphasised that all conversion proposals, whether for residential, business or tourism use, should be assessed consistently against clear and fair criteria.		
Other Comments	**WDC Response**	
None		

Policy HO16: Park Homes and Residential Caravan Sites

WDC Response to the Regulation 18 Consultations

Total: 68	Support: 58	Neutral: 2	Object: 8

Policy HO16: Park Homes and Residential Caravan Sites		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Natural England Amendment to policy to ensure accommodation located 400m-7km zone around the Ashdown Forest require HRA and appropriate mitigations are provided. Impacts on protected landscapes and natural environment need to be highlighted in the policy.	• Comment noted. The Council recognises the importance of protecting the integrity of Ashdown Forest and ensuring compliance with the Habitats Regulations. However, the requirement for Habitats Regulations Assessment and any necessary mitigation arises from separate legislation and applies to all relevant development proposals, regardless of whether it is specifically referenced within Policy HO16. The Council therefore considers that it is not necessary to duplicate these requirements within the policy. • The Council agrees that development should conserve and enhance protected landscapes and the natural environment. However, these matters are addressed through the wider environmental, landscape and biodiversity policies of the Local Plan, which apply to proposals for park homes and residential caravan	Comments noted. No changes required.

	sites. The Council does not consider it necessary to repeat these requirements verbatim within Policy HO16.	
Environment Agency Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Organisation with specific interest **CPRE Sussex** Supportive of the policy Only small extensions to existing park home sites should be permitted outside the development boundaries	Comment of support noted. Policy HO16 supports new park home and permanent residential caravan sites within development boundaries and limits proposals outside development boundaries to small-scale extensions to existing sites. The Council considers that the policy already provides an appropriate level of control and no further amendment is necessary.	Comments of support noted. No changes required.
Residents Associations **Dicker Residents Association** Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
The Working Group Against Over Development Supportive of the policy Only small extensions to existing park home sites should be permitted outside development boundaries	Comment of support noted. Policy HO16 supports new park home and permanent residential caravan sites within development boundaries and limits proposals outside development boundaries to small-	Comments of support noted. No changes required.

	scale extensions to existing sites. The Council considers that the policy already provides an appropriate level of control and no further amendment is necessary.	
Village Concerns Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Heathfield Parish Council Supportive of the policy Stronger cross-referencing to affordable housing policy and reiteration of requirements	Comment of support noted. The Local Plan should be read as a whole, and Policy HO14 operates alongside the wider housing policies of the Plan, including those relating to affordable housing. The Council does not consider it necessary to repeat or duplicate affordable housing requirements within this policy.	Comments of support noted. No changes required.
Horam Parish Council Criterion d should include ev charging and cycle provision Policy should include design guidance and density standards for park homes and residential caravan park Opposed allowing residential park home development on touring and camping sites due to potential impacts on the local tourism economy.	Comment noted. The Council acknowledges the suggestions regarding electric vehicle charging provision, cycle parking, design guidance and density standards for park homes and residential caravan developments. These matters are addressed through other relevant policies of the Local Plan, supplementary guidance and national standards where appropriate. The Council does not	Comments noted. No changes required.

	consider it necessary to duplicate these requirements within this policy. The Council also notes concerns regarding the potential loss of touring and camping accommodation to residential park home development and the possible effects on the local tourism economy. The policy seeks to achieve an appropriate balance between meeting housing needs and supporting the rural economy, and proposals will continue to be assessed against the wider objectives and policies of the Local Plan.	
Laughton Parish Council Supportive of the policy Policy does not address issues associated with existing Denland and LDC land in Laughton	Comment of support noted. Policy HO16 sets out a district-wide framework for assessing this type of development and is not intended to address existing matters relating to specific sites. Site-specific issues will be considered through the determination of planning applications and the application of relevant Local Plan policies	Comments of support noted. No changes required.
Pevensey Parish Council	Comment noted. The granting, monitoring and enforcement of planning permissions and site	Comments noted. No changes required.

Concerns regarding granting, enforcement and monitoring of permissions for seasonal caravan and mobile home sites. Objected to support for new residential caravan sites within development boundaries. Opposed the presumption in favour of small-scale extensions to existing sites due to concerns about appearance and infrastructure capacity. Considered traditional single-storey housing to be a more appropriate and cost-effective option for older residents.	licence requirements are addressed through existing planning and regulatory processes. The Council considers that appropriate mechanisms are already in place and no modification to the policy is required. Residential caravan and park home sites can contribute towards meeting identified housing needs and provide an alternative form of accommodation for some households. The policy limits support to suitable proposals that satisfy the criteria relating to design, accessibility, amenity, flood risk and infrastructure. The Council considers this to be an appropriate approach. Policy HO16 only supports small-scale extensions where the proposal satisfies the criteria of the policy, including requirements relating to local character, landscape, amenity, access and infrastructure. The Council considers that these safeguards are sufficient to ensure impacts are appropriately managed.	
Polegate Town Council Supportive of the policy	Comment of support noted. Policy HO16 already requires proposals to respond positively to local character and landscape, provide	

Safeguard should be in place to prevent overdevelopment of park home and caravan sites	appropriate infrastructure and facilities, and avoid unacceptable impacts on residential amenity, highway safety and capacity. These requirements, together with the wider design and environmental policies of the Local Plan, provide appropriate safeguards against overdevelopment.	
Rotherfield Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Westham Parish Council Supportive of the policy Safeguard should be in place to ensure holiday accommodation sites are not converted into permanent residential sites	Comment of support noted. Proposals involving the use of holiday accommodation as permanent residential accommodation would be required to obtain planning permission where a material change of use is involved and would be assessed against the relevant policies of the Local Plan. The Council also has powers to monitor and enforce compliance with planning conditions and occupancy restrictions where necessary. The Council considers that the existing planning framework provides appropriate safeguards and no additional policy wording is required.	Comments of support noted. No changes required.
Withyham Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.

Local Residents	WDC Response	Proposed Changes to Policy
Need for closer monitoring and enforcement of caravan park and residential caravan site developments. Requirement for sites to be well located, grouped appropriately and maintained to a high standard. Suggestion that larger sites should include a proportion of fully accessible homes. Request for minimum internal floorspace or occupancy standards for park homes/caravans. Recommendation to amend policy criterion (d) to include provision for: o Electric vehicle charging infrastructure. o Cycle storage and facilities. Concern that new residential caravan site proposals should not be restricted only to locations within development boundaries. Alternative view that residential caravan and park home developments should only be permitted within development boundaries. Concern that too many residential caravan sites have already been permitted in Pevensey. Concern that residential caravan developments may place pressure on local services without providing sufficient funding or contributions to the local area	Policy HO16 seeks to ensure that park home and residential caravan site developments are appropriately located, designed and serviced, whilst avoiding unacceptable impacts on local character, amenity, infrastructure and highway safety. Matters relating to accessibility, design quality, space standards, sustainable transport, infrastructure provision and developer contributions are addressed through the wider policies of the Local Plan and other regulatory regimes where appropriate. The Council considers that the policy provides an appropriate framework for assessing proposals and balancing housing needs with environmental and infrastructure considerations.	Comments noted. No changes required.
Other Comments	**WDC Response**	
None		

Policy HO17 Replacement Dwellings in the Countryside

WDC Response to the Regulation 18 Consultations

Total: 69	Support: 66	Neutral: 3	Object: 0

Policy HO17: Replacement Dwellings in the Countryside		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
None		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Organisations with specific interest</u> **Clarity Ecoworks** Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
CPRE Sussex Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Wealden Food Partnership Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
<u>Residents Associations</u> **Dickers Residents Associations** Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.

The Working Group Against Over Development Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Village Concerns Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Frant Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Heathfield and Waldron Parish Council Supportive of the policy The scale of replacement dwellings should be sustainable Consideration should be given to amount of glazing permitted to prevent unwanted light pollution. Grammar error in criterion f	Comment of support noted. The Council agrees that replacement dwellings in the countryside should be proportionate to their setting. Criterion 1(b) requires the scale, height, form, massing and floorspace of replacement dwellings to be proportionate to the existing dwelling and not materially more intrusive. The Council considers that the policy already addresses this matter. The Council recognises the potential impact of excessive glazing on rural character and light pollution. Such matters are considered through the assessment of design, landscape impact and local character under criterion 1(d) and other relevant design policies within the Local Plan. The Council does not consider additional policy wording is necessary. Criterion 1(f) has been replaced by 1(e) and grammar has been correct.	Comments of support noted. No changes required.

Horam Parish Council Remove permitted development rights where the existing dwelling has already been used or if the replacement dwelling has increased the overall floorspace. An up-to-date district wide design guide/design code should be produced.	Policy HO17 already provides for the removal of permitted development rights where extensions or alterations could undermine the objectives of the policy. The Council considers that decisions on the removal of permitted development rights should be made on a case-by-case basis, having regard to the specific circumstances of the proposal, rather than applied automatically in all cases. A district wide design guide has been produced in support of the Local Plan, but this does not need to be referred to in this policy.	Comments noted. No changes required.
Isfield Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Laughton Parish Council The policy could be counterproductive between the need of occupiers and overall need The policy does not address isolated rural homes	The policy seeks to provide an appropriate framework for assessing proposals while ensuring that development contributes to sustainable patterns of growth and supports the objectives of the Local Plan. Proposals for isolated homes in the countryside are considered through the wider spatial strategy and relevant Local Plan policies relating to development in rural areas.	Comments noted. No changes required.

Mayfield and Five Ashes Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Polegate Town Council Supportive of the policy Replacement dwellings should be similar to the original building where possible. It should be clearly stated what can be built under permitted development rights.	Comment of support noted. Criterion 1(b) requires replacement dwellings to be proportionate to the existing dwelling in terms of scale, height, form, massing, floorspace and appearance, whilst criterion 1(d) requires proposals to conserve the character and appearance of the countryside. The Council considers the policy already provides an appropriate framework to achieve this objective. Policy HO17 already provides for the removal of permitted development rights where necessary to ensure the objectives of the policy are not undermined. The Council does not consider it appropriate to restate national permitted development provisions within the Local Plan.	Comments of support noted. No changes required.
Rotherfield Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Withyham Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Add a criterion allowing replacement or relocation of dwellings where flooding from rivers or streams makes the existing location unviable and flood defences are not feasible.	Policy HO17 provides a flexible framework for replacement dwellings, allowing alternative siting where demonstrable landscape,	Comments noted. No changes required.

Remove permitted development rights where a dwelling has already benefited from extensions or where a replacement dwelling increases overall floorspace. Produce an up-to-date district-wide Design Guide or Design Code. Require mandatory mitigation measures for protected species, including barn owls. Support replacement dwellings in principle. Allow greater flexibility for additional housing on replacement dwelling sites to make better use of brownfield land. Use replacement dwelling sites as opportunities to provide smaller affordable homes. Restrict replacement dwellings to the original curtilage to minimise impacts on the landscape, highway views and neighbouring properties. Assess replacement dwellings on a case-by-case basis where they are in keeping with the character of the area. Remove the requirement in paragraph 1(b), with the view that replacing older properties with modern, energy-efficient homes is preferable to adaptation. Encourage energy-efficient replacement homes on existing sites to reduce pressure for development on greenfield land. Ensure the policy is robust, justified and capable of withstanding scrutiny at examination and appeal.	heritage, biodiversity, access or amenity benefits arise. Flood risk, energy efficiency and site-specific circumstances will be considered through the policy and other relevant Local Plan policies. The Council agrees that replacement dwellings should not result in unacceptable harm to the countryside, biodiversity or local character. The policy already provides for the removal of permitted development rights where necessary and is supported by wider biodiversity, landscape and design policies. The Council considers that appropriate safeguards are already in place. Policy HO17 is intended to address the replacement of existing dwellings rather than the provision of additional housing. Matters relating to affordable housing, housing growth, design guidance and wider development opportunities are addressed through other policies in the Local Plan.	
Other Comments	**WDC Response**	

None		

Policy HO18: Extensions and Alterations to Existing Dwellings, Outbuildings and Annexes

WDC Response to the Regulation 18 Consultations

Total: 78	Support: 69	Neutral: 2	Object: 7

Policy HO18: Extensions and Alterations to Existing Dwellings, Outbuildings and Annexes		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
None		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
Developers and agents **Landspeed** Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Organisations with specific interest **Clarity Ecoworks** Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
CPRE Sussex Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.

Residents Associations **Dicker Residents Association** Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
The Working Group Against Overdevelopment Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Village Concerns Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Willingdon Residents Association Present permitted development rules do not take into consideration the impacts and privacy of neighbours.	Comment noted. Permitted development rights are established through national legislation and fall outside the scope of Local Plan policy. However, where planning permission is required, Policy HO18 seeks to ensure that extensions, alterations, outbuildings and annexes do not result in unacceptable impacts on neighbouring amenity or local character. The policy also allows for the removal of permitted development rights where further development could cause harm. The Council therefore considers that appropriate safeguards are in place.	Comment noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Arlington Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Chiddingly Parish Council Supportive of the policy	Comment of support noted. Policy HO18 is intended to ensure that extensions, alterations, outbuildings	Comments of support noted. No changes required.

Extensions and alterations can help families remain in their homes but may also reduce the affordability of previously affordable properties.	and annexes are appropriately designed and proportionate to the host dwelling, whilst protecting local character and residential amenity. The Council does not consider it appropriate for this policy to control property values or affordability impacts arising from alterations to individual dwellings.	
Frant Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Heathfield and Waldron Parish Council Considered the term "original dwelling" to be unclear and requested clarification. Guidance should be provided regarding the Party Wall Act 1996. Applicants should justify the need for detached annexes. Clearer definition of what constitutes an annexe needed	Comment noted. The Council acknowledges the request for greater clarity regarding the term "original form" and the definition of an annexe. However, these terms are well established in planning practice and can be interpreted having regard to the particular circumstances of each case. The Party Wall Act is a separate legal matter outside the scope of planning policy and does not require reference within the Local Plan. The policy already provides a framework for assessing annex accommodation and its relationship to the main dwelling, and the Council considers that additional requirements are unnecessary.	Comment noted. No changes required.

Horam Parish Council Requested amendments to prevent the creation of additional dwellings outside the CIL process. Strengthen the policy to avoid adverse impacts on local character and neighbouring amenity. Need for professional and public scrutiny of further development. References to the "original dwelling" and the definition of an annexe to be unclear. Requested justification where detached annexes are proposed.	Comments noted. Policy HO18 seeks to ensure that extensions, alterations, outbuildings and annexes remain subordinate to the host dwelling and do not result in unacceptable impacts on local character or neighbouring amenity. The policy also requires annexes to remain functionally related to the host dwelling and includes provisions for planning conditions and obligations to prevent their separate occupation or disposal. The Council considers that the references to the host dwelling and annexes are sufficiently clear and that criterion 1(e) already requires applicants to justify the need for a new detached annexe where existing buildings cannot reasonably be converted. The policy provides an appropriate framework for assessing proposals and preventing the creation of independent dwellings through ancillary accommodation.	Comment noted. No changes required.
Isfield Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Laughton Parish Council Concerns that smaller dwellings may be extended over time, leading to the loss of smaller homes.	Comment noted. Policy HO18 seeks to ensure that extensions, alterations, outbuildings and annexes are proportionate to the	Comments noted. No changes required.

Policy primarily benefits higher-income households, potentially increasing living space rather than supporting downsizing opportunities. Suggested stronger controls on extensions to smaller dwellings outside development boundaries. Paragraph 1b should be less restrictive regarding design and appearance. Greater clarity and flexibility needed in paragraph 3 concerning the removal of permitted development rights.	host dwelling and do not result in unacceptable harm to local character, countryside character or neighbouring amenity. The policy balances the ability of residents to adapt their homes to changing needs with the need to safeguard the character of individual properties and their surroundings. The Council considers that the existing design requirements and provisions relating to permitted development rights provide an appropriate level of flexibility whilst enabling impacts to be managed where necessary. Matters relating to housing mix and the supply of smaller dwellings are addressed through the wider housing policies of the Local Plan.	
Mayfield and Five Ashes Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Pevensey Parish Council Suggested settlement-specific policies rather than a generic district-wide approach. Raised concerns about impacts on views and local character. Proposed amended wording for criteria e and f of the policy.	Comment noted. Policy HO18 provides a consistent framework for assessing extensions, alterations, outbuildings and annexes across the District, while allowing site-specific circumstances, local character and context to be taken into account through the decision-making process. The Council does not consider	Comments noted. No changes required.

	settlement-specific policies necessary. Policy HO18 contains criteria relating to scale, form, design, massing and appearance, and proposals will also be assessed against the wider design, landscape and heritage policies of the Local Plan. The Council considers that appropriate safeguards are already included.	
Polegate Town Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Rotherfield Town Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Uckfield Town Council Supportive of the policy Requested stronger protection for bungalows, expressing concern over their conversion to two-storey dwellings and the resulting loss of accommodation suitable for elderly and vulnerable residents. Concerns that subdivision of older properties may be financially attractive to developers but could adversely affect housing stock availability.	Comment of support noted. The Council recognises the importance of retaining a range of housing types, including bungalows, which can provide suitable accommodation for older people and those with accessibility needs. However, the policy must balance the retention of existing housing stock with the ability of homeowners to adapt and extend their properties to meet changing needs. Proposals will be assessed against the relevant design, amenity and housing policies of the Local Plan.	Comments of support noted. No changes required.

	The subdivision of existing residential dwellings is dealt with elsewhere within the Local Plan.	
Westham Parish Council Supportive of the policy Support the removal of permitted development rights as a mean of protecting existing housing stock	Comment of support noted.	Comments of support noted. No changes required.
Withyham Parish Council Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Lack of clarity regarding what constitutes an "original dwelling". Uncertainty over how extensions to newly acquired affordable homes would be treated. Concern that additional dwellings could be created outside the CIL process. Request to ensure development does not adversely affect local character or neighbouring amenity. Need for professional and public scrutiny of further development proposals. Suggestion to allow replacement buildings of exceptional architectural or environmental merit. View that redevelopment and extension of existing homes should be encouraged to make better use of the existing built environment. The policy may not work effectively where Section 106 agreements are in place.	Comments noted. The Council acknowledges concerns regarding the interpretation of the term "original dwelling", the treatment of extensions to affordable homes, the relationship with CIL and Section 106 agreements, and the operation of the policy in relation to co-housing and other community-led housing schemes. The Council considers that these matters can be addressed through the application of the policy and relevant planning guidance on a case-by-case basis. The need for appropriate scrutiny of development proposals is also provided through the planning application process. The Council notes the suggestions regarding replacement buildings of exceptional	Comments noted. No changes required.

The policy could disadvantage co-housing and other community-led housing schemes.	architectural or environmental merit and the encouragement of redevelopment and extension of existing homes; however, these matters are addressed through other relevant Local Plan policies.	
Other Comments	**WDC Response**	
None		

Policy HO19: Extensions to Residential Gardens

WDC Response to the Regulation 18 Consultations

Total: 74	Support: 72	Neutral: 1	Object: 1

Policy HO19: Extensions to Residential Gardens		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
None		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Organisation with specific interest</u> **Clarity Ecoworks** Does not support the policy Reference to AONB and South Downs should be removed as the Landscape Character Policy can suffice.	Comment noted. The High Weald National Landscape and the setting of the South Downs National Park are nationally protected landscapes that require particular consideration. Criterion 2 provides clarity on the need to conserve and enhance their special qualities when considering garden extensions in these sensitive locations. The Council considers that this requirement complements, rather than duplicates, the wider landscape policies of the Local Plan in this case.	Comment noted. No changes required.
CPRE Sussex Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Friends of the South Downs Supportive of the policy Extensions to gardens can have an impact on the character of the countryside if not carefully controlled.	Comment of support noted.	Comment of support noted. No changes required.

Supportive of reference to the setting of the National Park.		
<u>Residents Associations</u> **Dickers Residents Association** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
The Working Group Against Over Development Supportive of the policy Personal items are not permitted in the land that was previously countryside. The policy should allow for permitted development in exceptional circumstances.	Comment of support noted. Policy HO19 seeks to prevent the erosion of countryside character through domestic encroachment, including structures, parking, lighting and other domestic paraphernalia. Proposals for garden extensions will be assessed against these criteria, and planning conditions may be used where necessary to protect the character and appearance of the countryside. Policy HO19 allows for the removal of permitted development rights only where necessary to protect the character and appearance of the countryside. The Council considers that decisions regarding permitted development rights should be made on a case-by-case basis having regard to the circumstances of the proposal and the sensitivity of the location. The existing wording provides sufficient flexibility.	Comment of support noted. No changes required.

Village Concerns Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Chalvington With Ripe Parish Council Supportive of the policy Policy should specify when discretion to remove permitted development rights would be applied	Comment of support noted. Policy HO19 allows for the removal of permitted development rights only where necessary to protect the character and appearance of the countryside. The Council considers that decisions regarding permitted development rights should be made on a case-by-case basis having regard to the circumstances of the proposal and the sensitivity of the location. The existing wording provides sufficient flexibility.	Comment of support noted. No changes required.
Frant Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Heathfield and Waldron Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Horam Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Laughton Parish Council Supportive of the policy Insufficient emphasis on biodiversity enhancements resulting from garden extensions. Noted that the term "modest" is not defined within the policy.	Comment of support noted. Biodiversity considerations are addressed through wider biodiversity and environmental policies within the Local Plan, which apply to proposals for garden extensions where relevant. The Council does not consider it necessary to duplicate	Comment of support noted. No changes required.

	these requirements within Policy HO19. The term "modest" is intended to allow the policy to be applied flexibly, taking account of the size of the existing curtilage, the characteristics of the site and the surrounding countryside. A fixed definition may not be appropriate in all circumstances. The Council considers that the term provides sufficient flexibility whilst allowing proposals to be assessed on their individual merits.	
Mayfield and Five Ashes Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Polegate Town Council Supportive of the policy Safeguards are needed to prevent over-extension of properties and the use of land not owned by the garden owner	Comment of support noted. Policy HO19 already limits extensions to those that are modest in scale, proportionate to the existing curtilage and which conserve rural character. Planning applications can only be determined on land within the applicant's control or ownership, and applicants are required to certify ownership interests as part of the application process. The Council considers that the policy and existing planning procedures provide appropriate safeguards.	

Rotherfield Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Willingdon Parish Council Need to protect open-plan estates that contribute to local character. Sought protection of land needed for essential infrastructure, including health, education and recreational facilities.	Comment noted These matters are addressed through other policies within the Local Plan relating to design, infrastructure provision, community facilities and open space. The Council does not consider it necessary to duplicate these requirements within this policy.	Comment noted. No changes required.
Withyham Parish Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Enlarged residential gardens could subsequently be used to support proposals for additional dwellings. Policy should safeguard to prevent future residential development within enlarged garden areas. Policy should not proceed unless such safeguards can be secured. Larger dwellings should be capable of being subdivided into multiple dwellings upon resale. Support for increasing housing supply through subdivision of existing buildings rather than constructing additional homes.	Policy HO19 is intended to control the extension of residential curtilages into the countryside and does not establish a principle for future residential development. Any subsequent proposal for additional dwellings would be assessed against the development plan as a whole and on its individual merits. Criterion 3 also enables planning conditions and the removal of permitted development rights where necessary to protect the character and appearance of the countryside. The Council considers that appropriate safeguards are already provided.	Comments noted. No changes required.

Other Comments	WDC Response	
None		

Infrastructure

Policy INF1: Infrastructure Provision, Delivery, and Funding

WDC Response to the Regulation 18 Consultation

Total: 139	Support:48	Neutral:28	Object:62

Policy INF1: Infrastructure Provision, Delivery, and Funding		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Southern Water and Sports England • Support the policy in principle.	• Comment of support welcome.	No action required
Natural England • Policy should address impacts on the natural environment, protected landscapes, habitats and visual amenity.	• Comments noted. Environmental impacts are mainly addressed through relevant plan policies and evidence.	No action required.
National Highways • Consider Circular 01/2022 paragraph 29 within the policy. • There should be no presumption that such infrastructure will be funded through future national road programmes such as RIS. • NH will therefore work with local authorities to identify realistic alternative funding mechanisms,	• Reference to paragraph 29 of Circular 01/2022 has been referenced in the supporting text. • Infrastructure funding assumptions have been informed by the IDP and IDS and will be kept under review. • WDC has actively engaged with National Highways, ESCC and other transport infrastructure providers and operators on an ongoing basis as part of the new Local Plan.	The policy's supporting text now considers Circular 01/2022, paragraph 29.
ESCC	• Comments noted. The policy and supporting text have been updated to better reflect infrastructure	The policy and supporting text have been updated.

• Supporting text should better reflect infrastructure improvements, services and technology opportunities.	improvements, services and technology opportunities.	
Network Rail • Supports securing timely infrastructure delivery through planning conditions and the use of clawback mechanisms where viability improves. • Also seeks infrastructure contributions that provide for long-term maintenance, avoid capped Section 106 obligations where possible, and include review or clawback provisions to respond to changing costs and funding requirements.	• The policy to recognises the importance of ensuring that infrastructure is delivered and operational prior to occupation, or at an agreed trigger point. • Policy INF1 has been strengthened to ensure that transport infrastructure is delivered through a monitor-and-manage approach, supported by realistic funding and delivery mechanisms from the outset.	The policy and supporting text have been updated.
NHS • Strengthen policy to state that WDC will consult the ICB on healthcare infrastructure locations. • Secure developer funding for health and care services in growth areas. • Ensure healthcare infrastructure is delivered alongside new development.	• The NHS/ICB has been engaged through the Duty to Cooperate process and preparation of the IDP to inform healthcare infrastructure requirements arising from planned growth.	The policy and supporting text have been updated.
Neighbouring/Other Local Authorities (Regulation 18 (1)	**WDC Response**	**Proposed Changes to IDP**
Tunbridge Wells Borough Council (TWBC) • Recognises the need for cross-boundary engagement with KCC, TWBC and the relevant	• Comments noted. Cross-boundary infrastructure has been considered as part of the Local Plan process and will continue to be considered through our duty to cooperate work.	No policy change required.

NHS bodies on education and healthcare infrastructure delivery/provision • Requests continued liaison with relevant stakeholders.	Policy wording added in relevant site policies.	
Eastbourne Borough Council • Assess infrastructure impacts of South Wealden growth on Eastbourne. • Support the policy's approach to infrastructure capacity, delivery and funding. • Confirm that cross-boundary infrastructure is included.	• Comments noted. Cross-boundary infrastructure impacts have been addressed through the infrastructure evidence and transport (modelling) assessment that support the Local Plan.	No policy change required.
Rother District Council • Reference key strategic infrastructure in the Infrastructure Delivery Plan (IDP). • Continue joint working on infrastructure evidence and transport assessment.	• Comments noted. Strategic infrastructure has been reflected in the IDP and its supporting IDS. • The IDP and supporting Infrastructure Delivery Schedule have been updated.	No action required.
Kent County Council • Assess development impacts on Kent, particularly Tunbridge Wells. • Agree transport modelling and safety assessments with KCC where traffic increases are significant.	• Comments noted. Transport impacts and congestion have been assessed through the Council's evidence base, including transport modelling which have informed the Local Plan's transport mitigation measures and infrastructure requirements. • Infrastructure requirements have been considered through ongoing Duty to Cooperate engagement with KCC and other relevant stakeholders.	No policy change required.
Other Consultee Bodies	**WDC Response**	**Proposed Changes to IDP**

<u>Developers and land agents</u> **Hertfordshire Holdings, Tor & Co** • Clarify how CIL and Section 106 will fund infrastructure for allocations and other sites. • Set out infrastructure requirements for proposed site allocations.	• Infrastructure requirements for site allocations are set out in the relevant Local Plan policies.	No policy change required.
Grosvenor Property Uk Ltd • Strategic allocation at North West Hailsham could better deliver infrastructure than smaller sites.	• Noted	No policy change required.
South West Strategic Developments, Grassroots Planning • Full mitigation should be expected in all cases, with any departure from this approach permitted only where exceptional circumstances and overriding planning benefits are clearly evidenced.	• Comments noted. • The policy expects development to be supported by appropriate mitigation and requires applicants to use the most up-to-date evidence to identify infrastructure requirements and necessary mitigation measures.	No policy change required.
Taylor Wimpey UK Ltd • Policy is too vague on what infrastructure applicants must demonstrate. • Better recognise the role of CIL in funding strategic infrastructure. • Do not delay development where infrastructure depends on third parties or CIL funding. • Define infrastructure requirements clearly and limit obligations to relevant site-specific matters.	• Comments noted. The policy requires development proposals to demonstrate that infrastructure requirements and impacts have been appropriately assessed and addressed, while recognising that infrastructure delivery may be phased where dependent on third-party programmes or funding mechanisms, provided suitable	No policy change required.

	mitigation is secured to support sustainable development.	
Trafalgar Group Limited • Do not require applicants to prove foul water and sewerage capacity where statutory undertakers are responsible.	• Comments noted. Southern Water is responsible for the provision of foul water and sewerage infrastructure, but applicants must demonstrate that necessary infrastructure can be provided to support development.	No policy change required.
<u>Organisations with specific interests</u> **Village Concerns** • Clarify who is responsible for infrastructure delivery. • Recognise that the Council has limited control over third-party providers. • Assess current and future network capacity, including wastewater concerns. • Require capacity issues to be assessed before applications are determined.	• Infrastructure delivery responsibilities are identified through the IDP and planning application process, with utility and statutory providers responsible for delivering necessary network improvements. • Infrastructure capacity constraints, including wastewater requirements, have been considered through the evidence base and stakeholder engagement, and will be assessed further through the development management process.	No policy change required.
Green Transition Crowborough • Prioritise active travel to reduce car reliance and improve wellbeing. • Seek safer walking and cycling routes, crossings and school traffic measures funded by developers. • Improve joint working on active travel infrastructure.	• The Local Plan promotes safe, attractive and accessible walking, wheeling and cycling routes through Policy INF2 and the wider transport strategy, improving connections between homes, jobs, services, community facilities and public transport. • The Council will continue to work with ESCC and other partners to deliver active travel improvements.	No policy change required.

• Prioritise local active travel schemes over road and parking schemes.		
Clarity Ecoworks • Deliver infrastructure before most homes are sold. • Link infrastructure delivery to housing sales, not viability reviews. • Only allow reduced commitments in exceptional, clearly evidenced cases.	• Comments noted. • The policy has been strengthened. • Policy INF1 has also been strengthened to support the delivery of transport infrastructure through a monitor-and-manage approach, with funding and delivery mechanisms identified early and viability review and clawback provisions secured through Section 106 agreements where justified.	The policy and supporting text have been updated.
Rotherfield Protection Group • Supports draft Policy. • Concerned local services and utilities may lack capacity for growth. • Local survey highlights pressure on schools, healthcare, childcare and traffic.	• Support is welcomed. • Infrastructure requirements are identified and monitored through the IDP, which sets out the infrastructure needed to support growth, including its location, timing and delivery progress.	No policy change required.
Working Group Against Overdevelopment, and CPRE Sussex • Support the aim but question whether the policy will secure timely infrastructure. • Planning permission should depend on infrastructure being secured in step with development. • Concerned CIL, Section 106 and partnership funding may not deliver full infrastructure needs.	• The policy has been strengthened. • Policy INF1 has also been strengthened to support the delivery of transport infrastructure through a monitor-and-manage approach, with funding and delivery mechanisms identified early and viability review and clawback provisions secured through Section 106 agreements where justified.	The policy and supporting text have been updated.

• Question assumptions about modal shift in rural areas. • Use evidence and funding commitments before assuming travel behaviour change.		
Wealden Food Partnership, and Uckfield Chamber of Commerce • Support the policy in principle.	• Support is welcomed.	No action required.
<u>Residents Associations</u> **Willingdon Residents Association** • Deliver infrastructure before development proceeds. • Concerned the A2270 lacks capacity and cannot be widened. • Concerned traffic is diverting through Jevington, causing safety impacts. • Remove signage that directs traffic onto unsuitable local routes.	• Comments noted. The policy seeks to ensure that required infrastructure is delivered and operational before occupation, or by an agreed delivery trigger. • Site-specific highway and infrastructure requirements will be assessed through the relevant evidence base and planning application process. • Traffic management and signage matters fall within the remit of the relevant highway authority.	No policy change required.
Dicker Residents Association • Supports the objectives of the policy. • Question whether the Council can secure needed infrastructure improvements. • Do not allow developers to renegotiate infrastructure commitments after works begin.	• Support is welcomed. • Comments on securing infrastructure and avoiding later renegotiation are noted. • Infrastructure requirements will be secured through appropriate planning obligations and legal agreements.	No policy change required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**

Rotherfield Parish Council, and Chiddingly Parish Council • Agree in principle with the policy	• Support is welcomed.	No action required.
Laughton Parish Council • Supports the policy but notes delivery depends on partnership working and limited Section 106 scope. • Concerned some infrastructure needs rely on limited CIL funding. • Viability issues could reduce infrastructure contributions. • Recognise infrastructure priorities in parishes without neighbourhood plans.	• Support is welcomed. • Comments on CIL, Section 106, viability and parish infrastructure priorities are noted. The Council's Infrastructure priorities have been considered and will continue to be considered through the IDP, CIL and site-specific planning processes.	No policy change required.
Horam Parish Council • Do not reduce essential infrastructure contributions on viability grounds.	• The Council recognises the importance of securing appropriate infrastructure to support new development and will seek to secure the necessary mitigation and developer contributions in accordance with national policy, statutory requirements and the latest evidence, while ensuring development remains deliverable.	No policy change required.
Uckfield Town Council • Supports the policy but questions how infrastructure will be delivered and enforced. • Concerned viability provisions could weaken infrastructure requirements.	• Support is welcomed. • Necessary infrastructure should be delivered through planning conditions, Section 106 agreements and, where relevant, CIL, with	No policy change required.

• Seek clearer minimum infrastructure expectations for new developments. • Raise highway safety concerns where road measures are delivered too late. • Secure earlier delivery through Section 106 agreements. • Concerned delayed CIL payments limit local infrastructure planning.	delivery timed to mitigate site-specific impacts. • While viability remains a consideration, the Council will seek to secure the infrastructure required to support sustainable development, informed by the Infrastructure Delivery Plan and engagement with infrastructure providers and statutory consultees.	
Heathfield and Waldron Parish Council • Broadly supports the policy but is concerned about criterion 6. • Concerned existing water, wastewater and drainage issues are not fully addressed.	• Support is welcomed. Concerns regarding water supply, wastewater capacity and drainage infrastructure are acknowledged and have been considered through the Local Plan evidence base and ongoing engagement with infrastructure providers. These have informed updates to the IDP.	No policy change required.
Polegate Town Council • Assess traffic, healthcare and site-wide infrastructure needs before first occupation.	• Comments noted. • Infrastructure needs, including transport and healthcare, have been assessed through the Local Plan evidence base and engagement with infrastructure providers, and will continue to inform the Infrastructure Delivery Plan, site allocations and planning decisions. • Infrastructure delivery will be secured where necessary through appropriate phasing, planning conditions and planning obligations.	No policy change required.

Isfield Parish Council • Assess cumulative infrastructure needs and deliver required infrastructure before occupation.	• Comments noted. The plan-led approach enables cumulative transport impacts to be considered strategically and addressed through coordinated working with the Highway Authority, infrastructure providers and developers, supported where necessary by planning obligations and other mitigation measures.	No policy change required.
Mayfield and Five Ash Parish Council • Supports the policy but seeks action on existing infrastructure gaps and clearer use of CIL/Section 106 funds.	• Support is welcomed. The Council recognises the need to address existing infrastructure constraints and support growth through the timely delivery of infrastructure, with CIL and Section 106 funding directed in accordance with legislative requirements, infrastructure priorities and the IDP.	No policy change required.
Westham Parish Council • Assess cumulative impacts and safeguard land for schools, healthcare and other social infrastructure.	• Comments noted. The Council has considered cumulative impacts through the Transport Modelling and SA. • Land requirements for schools, healthcare and other community infrastructure will be safeguarded where necessary, working closely with relevant service providers to support sustainable growth.	No policy change required.
Maresfield Parish Council	• Comments noted. • The policy has been strengthened to emphasise that infrastructure should	See policy revised wording

• Strengthen requirements so infrastructure is delivered before occupation. • Keep the infrastructure definition under review to reflect new technology.	be delivered and operational prior to occupation, or by another agreed trigger point.	
Hailsham Town Council • Take a more proactive approach to growth, infrastructure and 20-minute neighbourhoods. • Support a 'decide and provide' approach to sustainable travel. • Work with ESCC to reflect this approach in transport assessments and policy.	• Comments are noted. The Local Plan supports sustainable growth, infrastructure delivery and improved accessibility through its evidence base and ongoing collaboration with ESCC. • Sustainable travel and access to services are embedded within the spatial strategy, site allocations and transport policies, including Policy INF2.	No policy change required.
Hellingly Parish Council • Highlight existing infrastructure deficits and lack of supporting services. • Require better assessment of road impacts and developer-funded repairs. • Improve developer accountability for timely completion and infrastructure adoption.	• Comments noted. Strategic transport modelling undertaken by East Sussex County Council has informed consideration of existing infrastructure constraints, transport impacts and developer contributions through the Local Plan evidence base and IDP, with further assessment undertaken through the development management process. • Planning conditions and obligations will be used, where necessary, to secure appropriate mitigation and infrastructure delivery.	No policy change required.
Frant Parish Council	• Comments noted. The policy supports a phased approach to	The policy wording has been strengthened.

• Strengthen parts 3 and 4 so required infrastructure is delivered before occupation.	infrastructure delivery, with timing agreed between the Council and infrastructure providers to ensure necessary infrastructure is operational before occupation, or by another agreed trigger point, secured through planning conditions, obligations and phasing arrangements.	
Pevensey Parish Council • Assess cumulative infrastructure impacts, including permitted but unbuilt schemes.	• Comments noted. The Council has considered cumulative impacts as part of the Transport Modelling and SA process.	No policy change required.
Buxted Parish Council • Object to viability provisions where full mitigation cannot be delivered. • Questions whether viability could undermine Local Plan policies. • Accept viability constraints only in exceptional, transparent and independently reviewed cases.	• Comments noted. The policies contained in the plan have been viability tested. Any viability case would need to be exceptional, transparent and robustly evidenced in accordance with national policy and guidance.	Policy INF1 has been strengthened in respect of viability.
Chalvington with Ripe Parish Council • Concerned infrastructure funding may not match housing growth in the south of the district. • Raise highway capacity concerns and increased use of rural rat-runs.	• Comments noted. Infrastructure requirements and funding have been assessed through the Infrastructure Delivery Plan (IDP) to support planned growth across the district. • Highway capacity and cumulative transport impacts, including potential effects on rural roads have been considered through transport evidence, modelling and the planning application process.	No policy change required.

East Hoathly with Halland Parish Council • Concerned healthcare access is already poor and will worsen without more capacity. • Question whether providers can support growth given existing rural infrastructure constraints.	• Comments are noted. Healthcare infrastructure requirements have been considered through engagement with NHS organisations during preparation of the IDP. • The capacity of healthcare services to support growth, including in rural areas, will continue to be assessed through infrastructure planning and the development management process.	No policy change required.
Wartling Parish Council • Broadband remains inadequate in some areas and needs further investment. • Support a strong local economy to help tourism growth.	• Comments noted. Digital infrastructure and support for the local economy have been addressed through relevant Local Plan policies and infrastructure evidence.	No policy change required.
Local Residents Regulation 18 (1)	**WDC Response**	**Changes made to policy/chapter**
<u>Principle of the Policy</u> • Mixed views on the policy, with many objections but some support. • Calls for infrastructure to be delivered before development is occupied, with developers funding and maintaining it through proportionate upfront contributions. • Seeks robust assessment of existing capacity, cumulative and cross-boundary impacts, early infrastructure planning and stronger community involvement, while opposing post-	**<u>Principle of the Policy</u>** • Comments noted. • The policy supports the timely and coordinated delivery of infrastructure, with requirements informed by the evidence base, IDP and engagement with infrastructure providers. Developer contributions, cumulative impacts, infrastructure capacity and cross-boundary matters are considered through plan-making and the development management process.	No action required

permission viability reductions that could undermine infrastructure provision. **Transport Infrastructure** • Improvements to transport infrastructure and management, including road maintenance, congestion relief, highway safety and public transport investment. • Infrastructure planning should be based on current conditions and updated evidence, with particular attention to Uckfield and the Stone Cross–Westham corridor, while supporting sustainable travel measures and avoiding harm to irreplaceable habitats. **Flooding and Water Infrastructure** • Developers should remain responsible for unforeseen flooding impacts. • Strengthen water management, watercourse protection and reservoir capacity planning. **Medical Facilities** • Address pressure on healthcare services and strengthen NHS involvement in planning. • Clarify how healthcare infrastructure will be funded and delivered.	**Transport Infrastructure** • Transport infrastructure requirements and impacts are assessed through transport evidence, modelling, the IDP and planning applications. The policy supports sustainable travel, while recognising the need to consider highway capacity, road safety, public transport and infrastructure maintenance in accommodating growth. **Flooding and Water Infrastructure** • The policy requires development to address flood risk and water management issues, with infrastructure needs informed by relevant evidence and consultation with statutory authorities and infrastructure providers. **Medical Facilities** • Healthcare infrastructure requirements have been identified through engagement with NHS bodies and are reflected within the IDP. The delivery of healthcare infrastructure will continue to be	

• Prepare a stronger strategy for GP surgeries and medical facilities. • Existing healthcare, education, drainage and highways are already under pressure. **<u>Development Areas and Spatial Strategy</u>** • Concerns about infrastructure capacity and delivery, suggesting a new settlement may better accommodate growth. • Highlights pressures in East Hoathly and Hailsham, questions the funding and deliverability of key highway, public transport and school improvements, • Infrastructure planning, recreation provision and the settlement hierarchy should better reflect existing and future infrastructure capacity.	considered alongside planned growth. **<u>Development Areas and Spatial Strategy</u>** • The spatial strategy has been informed by infrastructure capacity, constraints and delivery considerations. Infrastructure requirements, funding and deliverability will continue to be assessed through the IDP, site allocations and the planning application process.	
Local Residents Regulation 18 (2)	**WDC Response**	**Proposed Changes to the IDP**
• The Plan does not yet clearly demonstrate that the scale and distribution of development can be delivered within existing infrastructure constraints, particularly in relation to water supply and wastewater capacity. Without stronger evidence of infrastructure alignment, there is a risk that development could outpace essential provision. • The Plan should therefore include: - Clear phasing linked to infrastructure delivery;	• The Council recognises the importance of aligning growth with infrastructure provision, supported by an Infrastructure Delivery Plan (IDP) informed by engagement with infrastructure providers. • The IDP is a living document that will be reviewed and updated as new evidence emerges.	No action required.

- Transparent evidence of infrastructure capacity; and - Contingency measures where infrastructure delivery is delayed.	• Infrastructure delivery will be monitored throughout the plan period, with development expected to contribute through established funding mechanisms. • The Council is satisfied that the necessary infrastructure can be delivered alongside development, with monitoring arrangements in place to address any delivery issues.	
• Infrastructure requirements in respect of water should be clearly identified, with delivery mechanisms, funding sources and timescales established, before site allocations are confirmed. The Infrastructure Delivery Schedule should therefore be strengthened for any sites proposed for allocation at Regulation 19 stage.	• The Council has engaged with Southern Water throughout plan preparation, with infrastructure requirements and constraints reflected in the Infrastructure Delivery Plan. Site allocations are not precluded where there is a reasonable prospect of wastewater infrastructure being delivered within the plan period, and development proposals must demonstrate adequate capacity before occupation. • Site-specific constraints, including flood risk, water quality and ecological impacts, are recognised and will be addressed through the planning application process, informed by technical evidence and consultation with relevant statutory bodies.	No change required.

Other Comments	WDC Response	Proposed Changes to the IDP
• Consider alternative community living models to help meet housing needs. • Support local abattoirs to strengthen local food production and small farms.	• Comments noted.	No action required.

Policy INF2: Active and Sustainable Travel

WDC Response to the Regulation 18 Consultations

Total: 116	Support: 82	Neutral: 16	Object: 18

Policy INF2: Active and Sustainable Travel		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Sport England • Supports the policy in principle.	• Support for the policy is welcomed.	No change required.
Natural England • Welcomes the policy. • Requests that the policy better reflects multifunctional green infrastructure. • Requests greater recognition of health and wellbeing benefits.	• Support for the policy is welcomed. • The policy recognises, at a high level the health and wellbeing benefits of green infrastructure. Other Local Plan policies already address the wider health, wellbeing and multifunctional green infrastructure benefits, so it is not necessary to repeat these matters within this policy.	Minor wording amendments have been made to strengthen reference to the benefits of multifunctional green infrastructure and its contribution to health and wellbeing, as proposed.
Network Rail	• Comments noted.	No change required.

• Requests recognition that "severe" is not an equivalent rail assessment threshold. • Seeks continued joint working on rail constraints, accessibility, capacity and mitigation.	• Rail considerations will continue to be assessed through the relevant evidence and engagement with infrastructure providers.	
National Highways • Supports the sustainable transport approach. • Reference Transport Assessments and Travel Plans where development may affect the Strategic Road Network. • Requests alignment with Circular 01/2022.	• Comments of support noted. • The Council supports the use of Transport Assessments and Travel Plans, where proportionate and appropriate, for development that may affect the Strategic Road Network. • The emerging policy and national guidance already provide a framework for securing these assessments where required. • The Policy has been strengthened and is consistent with the principles of Circular 01/2022.	The Policy has been strengthened to align with the principles of Circular 01/2022.
East Sussex County Council • Supports the policy. • Seeks restructuring and clearer sub-headings. • Requests stronger references to partnership working, vision-led planning and transport assessments. • Requests reference to non-motorised user audits, sustainable travel plans and Active Travel England guidance. • Seeks greater emphasis on health and wellbeing benefits and active travel connectivity.	• Comments of support noted. • The policy wording and supporting text have been strengthened to reflect the proposed wording and overall, to improve clarity, implementation and alignment with transport and active travel guidance.	See updated policy wording.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**

Tunbridge Wells Borough Council • Supports the overall approach. • Supports reducing car travel and improving public transport, walking, wheeling and cycling. • Requests continued joint working on cross-boundary sustainable links to Royal Tunbridge Wells.	• Comments of support noted. • The policy already encourages a shift towards sustainable transport choices, helping to improve accessibility and reduce reliance on private vehicles. • The Council supports continued joint working with neighbouring authorities and relevant stakeholders to improve and maintain cross-boundary sustainable travel links, including connections to Royal Tunbridge Wells.	No change required.
Eastbourne Borough Council • Supports active and sustainable travel. • Seeks a stronger emphasis on reducing the need to travel and • reducing reliance on private cars.	• Comments of support noted. • The policy framework already promotes a reduction in car dependency; however, the policy wording has been further strengthened to reinforce this objective.	The policy wording has been further strengthened.
Kent County Council • Raises cross-boundary transport and Public Rights of Way issues relating to proposed development at Frant and Groombridge. • Requests Transport Statements and Sustainable Travel Plans. • Requests consideration of PRoW impacts, including potential upgrades and mitigation.	• The Council notes the comments regarding cross-boundary transport matters and Public Rights of Way (PRoW) in relation to development at Frant and Groombridge. • The Council supports the preparation of Transport Statements and Sustainable Travel Plans where proportionate and appropriate to the scale and nature of development. • The policy framework already requires consideration of impacts on Public Rights of Way and supports appropriate mitigation and enhancements where necessary to maintain or improve connectivity, accessibility and user experience.	No change required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**

Developers and land agents **Grosvenor Property UK Ltd** • Supports the general principles. • States that North West Hailsham will provide enhanced walking, cycling and public transport connections. • States that the scheme will embed 20-minute neighbourhood principles.	• Comment of support noted. • Comment noted about North West Hailsham. This site is considered in the site selection assessments. • The Council also notes the intention to embed 20-minute neighbourhood principles within the development. The policy framework supports the creation of well-connected, accessible communities where day-to-day needs can be met through sustainable modes of travel.	No change required.
Southwest Strategic Developments / Grassroots Planning • Supports high-quality active travel links and public transport improvements. • Considers these can be delivered particularly through larger-scale developments and garden communities. • Suggests wording to include locations that can be made sustainable criterion 3(a).	• The Council welcomes support for high-quality active travel links and public transport improvements, particularly through larger-scale developments and strategic growth locations. • The policy has been strengthened in regard to site which can be made sustainable.	See updated policy wording.
Wates Development • Seeks stronger clarity on a sustainable transport first approach. • Seeks reference to the use of "decide and provide". • Requests the removal of, or greater flexibility around, the criterion requiring public transport connectivity	• The policy already supports a sustainable transport-first approach by reducing the need to travel and promoting active and sustainable travel. • The policy has been reviewed and amended to better reflect vision-led and sustainable transport planning principles.	See updated policy wording.

within approximately 400m of most homes in major and strategic developments.		
Esquire Developments and Tunbridge Wells Rugby Football Club • Supports the aspiration for sustainable locations. • Considers the requirement for most homes in major and strategic developments to be within approximately 400m of public transport to be too restrictive. • Seeks flexibility based on route quality, service frequency and local context.	• Comment of support noted. • The Council welcomes support for directing development to sustainable locations. • The policy has been reviewed and amended to better reflect vision-led and sustainable transport planning principles.	See updated policy wording.
<u>Organisations with specific interests</u> **Cycle East Sussex** • Considers the policy positive. • Questions how the policy will be delivered. • Highlights ignored LCWIP routes and declining cycling and bus use. • Suggests stronger measures such as 20mph limits, LTNs, modal filters and less car-centric estate design.	• Comments of support noted. • The policy will be delivered through development management, infrastructure planning and partnership working. It supports walking, wheeling, cycling and public transport, while broader measures such as 20mph zones and traffic management are addressed through separate highway processes. • The policy has been strengthened to promote development that reduces reliance on private cars and supports sustainable travel choices.	Overall, the policy has been strengthened to further promote development that reduces the need to travel and limits reliance on private car use.
Wealden Line Campaign • Seeks greater emphasis on rail.	• Comments noted. The policy supports a multimodal approach to transport, which includes rail alongside walking, cycling and public transport.	No change required.

• Supports restoration of the Wealden/Uckfield line. • Highlights potential links to Lewes and Tunbridge Wells.	• The Council supports the restoration of the Wealden/Uckfield rail line. This support is reflected in Policy INF5. However, the delivery of such strategic rail infrastructure falls outside the scope of the Local Plan. • The Council also acknowledges comments regarding potential rail links to Lewes and Royal Tunbridge Wells.	
Transport Futures, East Sussex • Supports sustainable transport aspirations. • Seeks credible Transport Plans and SMART targets. • Requests better bus and cycle infrastructure. • Seeks safety consideration of electric vehicles. • Calls for reduced car-dependent development, 20mph limits, School Streets and LTNs. • Requests rapid LCWIP delivery and rail reconnection.	• Comments noted. The policy supports a multimodal approach to transport, which includes rail alongside walking, cycling and public transport. • The Council supports the restoration of the Wealden/Uckfield rail line. This support is reflected in Policy INF5. However, the delivery of such strategic rail infrastructure falls outside the scope of the Local Plan. • The Council also acknowledges comments regarding potential rail links to Lewes and Royal Tunbridge Wells.	No change required.
Clarity Ecoworks • Agrees with the principle of the policy.	• Support for the policy is welcomed.	No change required.
Conservators of Ashdown Forest • Supports improved public transport and Public Rights of Way (PRoW) access around Ashdown Forest.	• The policy supports measures that promote sustainable travel and improve accessibility. • The wider health, wellbeing, sustainability and environmental benefits of these measures are recognised and addressed through other Local Plan policies.	No change required.

• Links these measures to wellbeing, sustainability and habitat management objectives.		
Village Concerns • Considers the policy generally positive. • Raises concerns about traffic impacts and East Hoathly's sustainability. • Raises concerns about parking and car dependency. • Highlights the lack of monitoring or publication of Travel Plan outcomes.	• Support noted. • The Council notes acknowledges concerns about traffic, parking, East Hoathly's sustainability, and reliance on private cars. • The policy supports sustainable development, improved accessibility across transport modes, and reduced car dependency, informed by transport evidence, modelling, and the Sustainability Appraisal, with further assessment at planning application stage. • Effective Travel Plan monitoring will continue to be secured through the development management process where appropriate.	No change required.
Working Group against Overdevelopment and CPRE Sussex • Agree with the principle of the policy. • Question whether the policy has been applied to allocations, especially East Hoathly. • Seek stronger wording requiring transport mitigation to be possible and delivered before development.	• Support noted. • Site allocations, including East Hoathly, are supported by the evidence base and Sustainability Appraisal, with site-specific issues addressed through plan policies. • Supporting text has been strengthened to promote a vision-led approach to transport, with impacts managed through monitoring, triggers, and targeted interventions. • Transport mitigation will continue to be assessed and secured through the planning application process in consultation with relevant authorities.	Supporting text has been updated.
Eastbourne Eco Action Network • Supports commitments to car clubs, buses and cycling.	• Support noted. • Overall, the policy has been strengthened to further promote sustainable and active travel, supporting the delivery of direct, attractive and well-connected	The policy has been strengthened.

• Considers these should be prioritised more strongly. • Seeks direct active travel routes secured through design and obligations.	active travel routes through development design and, where appropriate, planning obligations.	
Friends of the South Downs • Generally, supports Policy INF2. • Considers the wider Plan over-emphasises road building, particularly the A27. • Considers the Plan gives insufficient weight to public transport and rail investment.	• Support noted. • The Plan promotes an integrated transport strategy, supporting walking, cycling, public transport and rail connectivity alongside targeted highway improvements where necessary to support sustainable growth and mitigate transport impacts.	No change required.
Rotherfield Protection Group • Agrees with the policy. • Highlights resident concerns about road safety. • Highlights concerns about car dependency, non-car accessibility and traffic congestion in Rotherfield.	• The Council welcomes support for the policy and notes concerns regarding road safety, car dependency, accessibility and congestion in Rotherfield. • The policy promotes sustainable and active travel, improved accessibility, and reduced reliance on private car use.	No change required.
Jevington and Filching Community Organisation • Seeks traffic mitigation for rural communities affected by development traffic. • Seeks traffic calming for communities within the South Downs National Park.	• The Council notes concerns about development traffic affecting rural communities and settlements in the South Downs National Park. • Transport impacts must be assessed and mitigated, with appropriate measures secured through the planning application process in consultation with highway authorities and stakeholders.	No change required.
Residents Associations	• The Local Plan provides a robust and effective framework for policy delivery through development	No change required.

Dicker Residents Association • Considers implementation powers need to be increased. • Seeks stronger mechanisms to ensure the policy is carried out in practice.	management, infrastructure planning and partnership working with key stakeholders. • The Council is satisfied that appropriate mechanisms are in place to support the effective delivery of the policy in practice.	
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Laughton Parish Council, Isfield Parish Council and Frant Parish Council • Agree in principle with the policy.	• Support for the policy is welcomed.	No change required.
Mayfield and Five Ashes Parish Council • Supports the policy. • Stresses that it must be implemented coherently and clearly.	• The Council welcomes support for the policy and is satisfied that its implementation will be supported through development management and ongoing partnership working.	No change required.
East Hoathly with Halland Parish Council • Supports the policy, subject to detail. • Seeks a fully integrated network of active and sustainable movement routes. • Requests that routes are safe, direct and convenient.	• The Council welcomes support for the policy. The policy framework seeks to deliver a well-integrated network of active and sustainable travel routes, and supports the provision of connections that are safe, direct, convenient and accessible for all users. .	No change required.
Heathfield and Waldron Parish Council • Raises concerns that limited public transport makes active travel less practical. • Highlights hilly topography, narrow lanes and an older population as constraints.	• The Council recognises challenges arising from public transport provision, local topography, rural roads, and demographic factors, and applies a proportionate approach to maximise sustainable and active travel opportunities. • The Council supports measures to improve rail access and connectivity where feasible.	No change required.

• Suggests greater use of rail.		
Polegate Town Council • Seeks consideration of car use and 20-minute neighbourhoods. • Requests early Highways engagement. • Seeks better alignment between WDC and Highways.	• The Council supports sustainable, well-connected communities and the application of 20-minute neighbourhood principles where appropriate. • Transport matters have been addressed through ongoing collaboration with National Highways and East Sussex County Council, with continued partnership supporting coordinated transport planning and infrastructure delivery.	No change required.
Horam Parish Council • Suggests rewording criterion 3(c). • Requests reference to healthy places, streets, footpaths and bridleways. • Suggests these should contribute to complete, compact and connected neighbourhoods.	• Comments noted. The policy's criterion 1 has been strengthened further to promote sustainable and accessible developments.	Amendments made to policy wording.
Rotherfield Parish Council • Seeks amendment of electric vehicle references to sustainable or low carbon vehicles. • Notes that cycling is limited by narrow roads and hilly topography.	• Comments noted. The policy adopts a technology-neutral approach where appropriate, while continuing to support the transition to lower-emission forms of transport. • The Council acknowledges that factors such as narrow roads and hilly topography can present challenges for cycling. The policy seeks to maximise opportunities for active travel where feasible.	No change required.
Westham Parish Council • Seeks consideration of school capacity. • Highlights the importance of commuter-relevant bus timing.	• Comments noted. The Council recognises the importance of ensuring that education and transport infrastructure are planned alongside growth. School capacity, public transport accessibility and service provision have been considered through ongoing infrastructure planning and engagement with relevant providers.	No change required.

• Raises concerns about circuitous bus routes. • Suggests parking provision should be treated as an indicator of expected car use.		
Chiddingly Parish Council • Raises concerns about development away from regular public transport. • Highlights unsafe roads without pavements or cycle lanes. • Raises concern about the cumulative macro-level impact of development on highways and pedestrians.	• Comments noted. The policy supports the provision and enhancement of safe, accessible and well-connected active travel routes where appropriate. • The cumulative impacts of development on the transport network have been assessed through the evidence base and will be considered further through the planning application process where appropriate**.**	No change required.
Uckfield Town Council • Supports the aims of the policy. • Highlights poor public transport coverage and hilly topography. • Raises concerns about cumulative junction impacts. • Highlights lack of engagement on local highways matters. • Raises concern about delayed infrastructure provision.	• Comments noted. • The Council recognises concerns regarding cumulative transport impacts, local highways matters and the timely delivery of infrastructure. These issues have been considered as part of our evidence baseand will continue to be considered through infrastructure planning, partnership working and the development management process.	No change required.
Arlington Parish Council • Supports the policy wording. • Questions consistency with the Knights Farm sports centre proposal. • Cites car dependency and limited public transport as concerns.	• Support noted. • The policy promotes sustainable travel choices and reduces reliance on private car use.	No change required.

Hailsham Town Council • Supports the 20-minute neighbourhood approach. • Seeks spatial mapping of sustainable locations. • Requests links to growth directions, LCWIP delivery and specific active travel network improvements.	• Support noted. • The mapping points have been addressed through the wider evidence base, including the Policies Map, infrastructure planning and supporting delivery mechanisms.	No change required.
Crowborough Town Council • Raises concerns that young people cannot access education and employment due to poor transport. • Challenges the description of hourly buses as "very frequent". • Notes uncertainty over FlexiBus. • Seeks clarification on the County-Wide Transport Model.	• The policy supports improved sustainable transport and connectivity across the district. • Bus service frequency and the future of the FlexiBus service fall outside the scope of the Local Plan and are matters for ESCC and service providers. • Transport impacts have been assessed using the County-Wide Transport Model and will continue to be addressed in collaboration with transport and highway authorities.	No change required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Principle of the policy • Many residents were supportive of active and sustainable travel. • There was support for better buses, walking, cycling, car clubs, e-bikes, reduced car use and planning for modal shift. **Deliverability and rurality**	**Principle of the policy** • The Council welcomes support. **Deliverability and rurality**	No direct policy change required.

• Objections focus on the practical difficulty of delivering active travel in rural areas. • Key barriers include narrow lanes, limited pavements, poor public transport, car dependency, weather, topography and safety concerns. **Public transport and rail** • Residents call for more reliable, affordable and frequent bus and rail options. • Residents also seek better links to rail stations and reinstatement of rail routes. **Policy consistency and accessibility** • Concerns were raised about the requirement for most homes in major and strategic developments to be located within approximately 400m of public transport. • Concerns were raised about potential inconsistency with 20-minute neighbourhood principles. • Residents highlighted the need to address older, disabled and mobility-impaired residents.	• The Council acknowledges the challenges associated with promoting sustainable travel in a predominantly rural area. • The policy seeks to maximise opportunities for sustainable travel while taking account of local circumstances and constraints. **Public transport and rail** • The Council recognises the importance of reliable public transport and rail connectivity. The policy supports improved access to public transport and rail services where feasible, while matters relating to service provision and frequency fall outside the scope of the Local Plan. **Policy consistency and accessibility** • The reference to public transport connectivity within approximately 400m of most homes in major and strategic developments has been removed. • The policy supports the delivery of sustainable, well-connected communities where day-to-day needs can be accessed by a range of sustainable transport modes which aligns with 20 -minute neighbourhood approach. • The policy supports inclusive and accessible transport networks that respond to the needs of older people, disabled people and those with mobility impairments.	

Infrastructure and development impacts • Residents consider that development should be located close to jobs and services. • Residents consider that infrastructure should be delivered before growth. • Residents suggest site allocations should be reconsidered where they increase car dependency.	**Infrastructure and development impacts** • The Council agrees that development should be supported by appropriate infrastructure and located in accessible and sustainable locations wherever possible. Infrastructure requirements and transport impacts will continue to be considered through infrastructure planning, site-specific policies and the development management process.	
Other Comments	**WDC Response**	**Changes made to policy/chapter**
• Requests for new or improved road infrastructure, including around Hailsham, Herstmonceux, Uckfield, Horam and the A22/A27 corridors. • Objections to road schemes or development impacts near sensitive habitats, including Ashdown Forest and Lake Wood/West Park/Butchers Wood. • Site-specific concerns about Uckfield, East Hoathly, Horam, Hailsham, WES-7 and other proposed development locations. • Calls for masterplanning, improved pavements, disabled accessibility, safe crossings, cycle routes and infrastructure before major development.	• The Council notes the requests for highway improvements and the concerns raised regarding development impacts on the local road network, sensitive habitats and specific proposed development locations. These matters are addressed through the Local Plan evidence base, infrastructure planning and, where relevant, site-specific policies rather than the detailed wording of Policy INF2. • The Council supports a coordinated approach to development through masterplanning and the delivery of appropriate infrastructure. . • The Council also recognises the importance of access to the countryside and opportunities for walking, running and recreation in supporting health and wellbeing. These objectives are reflected within the wider policy framework.	No direct policy change required.

• Suggestions for walking, running and countryside access initiatives to support health and wellbeing.		

Policy INF3: Parking provision

Wealden DC Regulation 18 Consultation

Total: 87	Support:31	Neutral:3	Object:53

Policy INF3: Parking provision		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council • Suggests strengthening the policy and supporting text to reflect East Sussex County Council's proposed wording, including updated references to the *Guidance for Parking at New Development (2024)*, clarification that the guidance should be the starting point for determining parking provision, and explicit reference to accessible parking for disabled people.	• Comments noted and supported.	The policy and supporting text have been strengthened to incorporate East Sussex County Council's proposed wording and to align with the Guidance for Parking at New Development (2024).
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
No comments	• Not applicable	• Not applicable
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**

Developers and land agents **Hertfordshire Holdings Tor & Co** • Supports that flexibility in parking standards should be specifically provided for in draft Policy wording itself where proposed developments are in highly accessible locations which are well served by public transport.	• The policy already provides a flexible and proportionate approach to parking standards in highly accessible locations, taking account of accessibility, public transport availability, sustainable travel options and other site-specific circumstances.	No change required.
Taylor Wimpey UK Ltd • Objects to Policy INF3 as it is not clear on applying or departing from ESCC parking standards, which are only a "starting point", and does not state when lower or higher requirements are justified. • Considers the policy unjustified because it does not reflect updated ESCC Parking Guidance (April 2024) and recommends removing "starting point for decision making" from criterion 1 to improve clarity, effectiveness and soundness.	• Comments noted. The policy has been updated to align with ESCC's Parking Guidance (2024), with any departures considered on a case-by-case basis based on site-specific circumstances, accessibility, sustainable transport opportunities, and supporting evidence.	The policy now refers to and aligns with the ESCC Guidance for Parking at New Development (2024).
Landspeed • Supportive of the draft Policy.	• Comment of support noted.	No action required.
Organisations with Specific Interests **Village Concerns** • Objects to the emphasis on electric vehicles and advocates directing development to genuinely sustainable locations.	• Comments noted. The policy supports sustainable transport while ensuring appropriate parking provision. • Parking must be designed to maintain safe and efficient	The policy now refers to and aligns with the ESCC Guidance for Parking at New Development (2024).

• Raises concerns over parking provision, on-street parking, street clutter, and impacts on walking, cycling, and wheeling, including in East Hoathly. • Seeks stronger safeguards for on-street parking to protect access and safety, and requests parking standards better reflect local car ownership, work and leisure vehicles, vehicle sizes, and cycle storage needs.	movement, accessibility, and suitable access arrangements. • Parking provision will be assessed on a site-specific basis, taking account of local circumstances and evidence. • The policy has been strengthened to align with ESCC's Parking Guidance for New Development (2024).	
The Working Group Against Over Development, CPRE Sussex and Clarity Ecoworks • Object that existing standards does not reflect actual demand, particularly work vans/commercial vehicles parked at or near homes, causing overspill onto streets and visitor spaces. • Recommend updating ESCC residential and non-residential parking calculators or amending INF3 so additional parking is required where guidance underestimates demand, including for work vehicles.	• Comments noted. The Council acknowledges concerns regarding parking demand associated with work vans and commercial vehicles. The policy has been updated to reflect the *ESCC Guidance for Parking at New Development (2024)*, which provides the basis for determining parking requirements.	The Council has updated the policy to reflect the ESCC Guidance for Parking at New Development (2024).
Eastbourne Eco Action Network C.I.C. • Objects and suggests parking management should vary resident permits/fees by vehicle size, carbon emissions and pollution. • Supports reducing private car ownership through limited parking where appropriate, car clubs, and varied EV charging options including	• Comments noted. The Council notes the comments regarding parking management measures, including resident permit schemes and charging structures. These matters fall outside the scope of the Local Plan and are typically addressed through separate parking	No action required.

3.5kW, 7kW and rapid chargers to improve urban charging access.	management and highway processes. • The Council supports measures that encourage a reduction in private car ownership and greater use of sustainable transport options through Policy INF3.	
Green Transition Crowborough • Objects to draft Policy INF3. • Concerns raised over the pace at which electric vehicles charging infrastructure are being integrated into new developments across East Sussex.	• Comments noted. The rollout of EV charging infrastructure is supported through national requirements, relevant parking guidance, the IDP and the wider Local Plan policy framework. Together, these provide an appropriate basis for securing EV charging provision as part of new development and supporting the transition to lower-emission transport.	No change required.
<u>Resident Associations</u> **Dicker Residents Association** • Supportive of draft Policy INF3.	• Comment of support noted**.**	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Horam Parish Council • Objects and seeks an explicit section on EV charging requirement. • Asks for an explicit section on EV charging .	• Comments noted. • The policy has been strengthened to require parking to be designed and integrated in a manner that maintains safe and efficient movement for all users. This	See amended policy wording.

	approach is consistent with national policy, relevant parking guidance and the Local Plan evidence base, while retaining sufficient flexibility. • The IDP also considers EV infrastructure as part of sustainable transport provision.	
Heathfield & Waldron Parish Council • Supports INF3 but notes the policy does not recognise additional work vans parked at home by employees or the self-employed.	• The Council welcomes support for Policy INF3 and acknowledges comments regarding parking demand associated with work vans and similar vehicles. The policy has been updated to reflect the ESCC Guidance for Parking at New Development (2024).	The Council has updated the policy to reflect the ESCC Guidance for Parking at New Development (2024).
Laughton Parish Council • Supports INF3 but says growing families may need 4+ cars and the calculator does not account for these social factors, so developments should include sufficient additional spaces.	• The Council welcomes support for Policy INF3 and acknowledges the comment regarding the parking needs of larger households. The policy has been updated to reflect the ESCC Guidance for Parking at New Development (2024).	The Council has updated the policy to reflect the ESCC Guidance for Parking at New Development (2024).
Rotherfield Parish Council, Mayfield and Five Ashes Parish Council, Isfield Parish Council and Arlington Parish Council • Supportive of draft Policy INF3.	• Comment of support noted.	No action required.
Polegate Town Council • Objects due to parking pressures and sustainable transport infrastructure constraints in Polegate.	• The Council notes concerns about parking and sustainable transport infrastructure in Polegate, which will continue to be addressed through	No change required.

• Recommends stronger support for 20-minute neighbourhood principles, recognising Polegate's role as a self-sustaining community and applying the concept to rural areas through village networks, active travel links, and complementary services.	development management and infrastructure planning. • The policy supports sustainable, well-connected communities by balancing parking provision with the promotion of sustainable travel choices.	
Uckfield Town Council • Supports INF3 but says standards must reflect larger, extended/concealed households, home-based trade workers with vans, modern vehicle sizes and higher ownership levels. • Raises road safety and parking pressure concerns where additional vehicles exceed standard provision, including Fernley Park, Teelings Drive, Uckfield.	• The Council welcomes support for Policy INF3 and acknowledges the comment regarding the parking needs of larger households. The policy has been updated to reflect the ESCC Guidance for Parking at New Development (2024).	The Council has updated the policy to reflect the ESCC Guidance for Parking at New Development (2024).
Willingdon and Jevington Parish Council • Supports draft Policy INF3. • Recommends that telecommunications infrastructure, including mobile phone masts, should be located in industrial or commercial areas where possible to minimise impacts on residential amenity and the rural landscape.	• The Council welcomes support for Policy INF3. The comment regarding telecommunications infrastructure is not directly related to parking provision and is more appropriately considered under Policy INF4 and relevant design policies. The siting of telecommunications equipment will be assessed in accordance with national policy and the wider Local Plan policy framework.	No change required.
Westham Parish Council • Supports INF3 and recommends parking/transport assessments use 2021 Census travel-to-work data for the proposed	• The Council considers that the policy provides sufficient flexibility to take account of local travel patterns and parking demand on a site-specific basis.	No change required.

development area to better reflect local travel patterns and parking demand.		
Frant Parish Council and Maresfield Parish Council. • Support INF3 but recommend resisting garage conversions where garages count towards residential parking standards, to retain original provision/layout and avoid on-street parking, congestion and highway safety impacts.	• Support is welcomed. Any proposal resulting in the loss of parking provision will be assessed on its individual merits, having regard to parking standards and its potential impact on on-street parking and highway safety.	No change required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Principle of the policy • General support was expressed for ensuring appropriate parking provision within new developments, although views differed on the level of parking required and the balance between parking provision and sustainable transport objectives.	• Comments of support and concerns noted. Policy INF3 seeks to balance parking needs with sustainable transport objectives, with provision assessed on a site-specific basis having regard to local circumstances, supporting evidence and the ESCC Guidance for Parking at New Development (2024).	No change required.
Electric Vehicle Charging • Calls for explicit EV charging across allocated, visitor, disabled and unallocated spaces, including all dwellings with off-street parking and potential multiple chargers for larger dwellings, while questioning EV transition pace and EV/e-bike battery safety.	• Policy INF3 has been strengthened to support the provision of electric vehicle charging infrastructure across all parking types, in line with relevant standards and guidance.	Policy wording amended.
Residential Parking Standards	• Comments are noted. Parking provision across the district will be informed by the relevant standards	No action required.

• Concerns that recent developments, ESCC guidance and the Parking Calculator underestimate car ownership, especially in rural areas, and should better reflect local ownership, household size, rural circumstances, shared parking needs, and modern vehicle/garage dimensions.	and guidance, as well as local circumstances, including car ownership levels, household characteristics, rural context, modern vehicle sizes and evidence of parking pressure.	
Visitor, Commercial and Specialist Vehicle Parking • Suggested that stronger requirements for visitor parking are needed, as this is often overlooked in new developments. • Suggested that parking standards should account for work vehicles, including larger vans, caravans, trailers, motorhomes and boats.	• The Council acknowledges concerns regarding parking demand, including in rural areas, visitor parking, work vehicles and other specialist vehicles.	No action required.
On-Street Parking, Design and Road Safety • Concerns that inadequate parking causes on-street/pavement parking, visual clutter, road safety issues and barriers to active travel; developments should minimise on-street parking and, where provided, maintain safe access for pedestrians, cyclists, wheelers, emergency services and refuse vehicles.	• The Council recognises concerns relating to on-street parking, highway safety and the quality of the public realm. The policy seeks to ensure that parking is appropriately designed and integrated to support safe and efficient movement for all users.	No change required.
Sustainable Travel and Reducing Car Dependency • Suggests directing development to sustainable locations and designing local journeys around sustainable travel choices, including car clubs, controlled parking zones, improved active	• The Policy supports the reduction of car dependency through sustainable patterns of development and improved travel choices, while recognising the need for an appropriate level of parking provision.	No change required.

travel infrastructure and low-car/car-free options to reduce private car dependency.		
Town and Village Centre Parking • Concerns raised over limited parking availability in town and village centres can discourage local shopping and services. • Suggested that new development should consider and help mitigate parking pressures in nearby settlements where appropriate.	• Comments noted. Parking pressures in town and village centres have been considered through site-specific transport assessments and, where necessary, mitigation measures. Wider public parking management falls outside the scope of Policy INF3, although parking impacts arising from new development will be considered through the planning process where relevant.	No change required.
Cycle Parking and Storage • Seeks secure, accessible and practical everyday cycle storage, improved town-centre cycle parking, regular review of demand, and measures to ensure cycle stores are used as intended.	• Comments noted. The policy supports the provision of secure, accessible and well-designed cycle parking as part of new development, helping to encourage active travel. Detailed requirements, including the type, quantity and design of cycle parking, will be considered through the development management process having regard to current standards, site circumstances and the needs of users.	No change required.
Other Comments	**WDC Response**	
• No comments	n/a	n/a

Policy IN4: Utlities

Total: 103	Support: 78	Neutral: 9	Object: 16

Policy INF4 – Utilities		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Local Plan should demonstrate that there is sufficient infrastructure to serve planned growth through the lifetime of the plan.	• Comment noted. The Local Plan demonstrates that the infrastructure required to support planned growth is either available or can be delivered in a timely manner over the plan period. This is informed by ongoing engagement with infrastructure providers and stakeholders and supported by the Infrastructure Delivery Plan, which identifies infrastructure needs, delivery mechanisms, funding sources and timescales. Where infrastructure constraints are identified, appropriate mitigation measures will be required to ensure development is coordinated with the provision of necessary physical, social and green infrastructure.	No change required.
Southern Water • Supportive of draft Policy INF4.	• Comment of support noted.	No change required.
South East Water (SEW) Limited • Supportive of draft Policy INF4. • Policy should offer direct support for utility development where planning permission is required.	• The Council welcomes South East Water's support and recognises the importance of utility infrastructure, including water supply, in supporting growth and climate resilience. • Infrastructure requirements have informed the Local Plan evidence base through ongoing engagement with South East Water.	No change required.

• Support should be extended to all water resource development necessary to support growth and adaptation to climate change. • Requests further review/input into the Infrastructure Delivery Plan to reflect South East Water's deliverables.	• The Council will continue working with South East Water to keep the Infrastructure Delivery Plan up to date and support timely infrastructure delivery.	
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Eastbourne Borough Council • Notes references to wastewater treatment infrastructure in Policy INF4 and Policy NE13. • Concerned about local network capacity to convey wastewater to Wastewater Treatment Works (WTW). • Considers improvements/reinforcements are needed to avoid sewage discharges into the sea. • Development in south Wealden should be encouraged to connect to other WTW rather than Eastbourne WTW where possible.	• The Council recognises concerns about wastewater capacity and supports the timely delivery of infrastructure, including necessary network upgrades. • Ongoing engagement with Southern Water and other providers will help address capacity constraints and support sustainable wastewater management. • While the Plan does not prescribe which treatment works serve development, it requires sufficient wastewater capacity to support growth without adverse environmental impacts.	No policy change required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
<u>Developers and land agents</u> **Taylor Wimpey UK Ltd** • Objects to draft Policy INF4.	• The policy has been strengthened to ensure development is supported by adequate utility infrastructure, with requirements considered at planning application stage.	See amended wording.

• Considers applicants cannot demonstrate or secure utility capacity over a development's lifetime. • Suggested criterion 1 should be removed or amended by removing reference to "over its lifetime" for soundness.	• References to utility provision "over its lifetime" have been removed; applicants must instead demonstrate, in consultation with utility providers, that sufficient capacity is available or can be delivered to support development.	
Home Builders Federation • Considers utilities supply is not a development management matter. • Suggested the Council should work with providers through plan-making to ensure sufficient utilities. • Suggested Policy INF4 should not require applicants to demonstrate sufficient capacity for utilities such as water and power.	• The Council recognises the importance of engaging infrastructure providers and has worked closely with utility companies in preparing the Local Plan and evidence base. • Policy INF4 requires proportionate evidence that sufficient infrastructure capacity exists, or can be secured through upgrades, to support development.	No change required.
Grosvenor Property UK Limited • Supports Policy INF4 and the need for sufficient utility infrastructure capacity. • Notes scope to upgrade Hailsham North WWTW or provide an onsite treatment works if required to serve North West Hailsham. • Commits to working with Southern Water and other providers to meet	• The Council has engaged closely with utility providers in preparing the Local Plan and Infrastructure Delivery Plan. • Policy INF4 requires planning applications to demonstrate that adequate utility infrastructure is available or can be delivered in time to support development. • The policy does not require applicants to deliver strategic infrastructure, but to provide proportionate evidence that sufficient capacity exists or can be secured through necessary upgrades.	No change proposed.

current and future wastewater capacity needs.		
Persimmon Homes South East • Considers utility supply is addressed through separate statutory regimes. • Considers providers are required to ensure adequate services to meet plan-led needs. • Suggested Policy INF4 should not require applicants to demonstrate sufficient capacity for utilities such as water and power.	• The Council recognises the role of utility providers in planning for growth, while ensuring development is supported by adequate infrastructure. • Policy INF4 requires proportionate evidence that utility capacity is available or can be delivered in time to support development, helping avoid unacceptable pressure on existing infrastructure.	No change required.
<u>Organisations with specific interests</u> **Village Concerns** • Supports Policy INF4 but raises concerns about the cost, management, and long-term maintenance of SuDS and sewage infrastructure. • Seeks clarity on responsibility for managing SuDS schemes and protecting residents from unforeseen maintenance costs. • Recommends costed maintenance estimates, enforceable adoption arrangements for sewage infrastructure, and review of the	• Comment of support noted. Matters relating to the design, adoption, maintenance and long-term management of SuDS is addressed addressed through relevant climate change policies, planning conditions and delivery mechanisms, where appropriate. • Policy INF4 seeks to ensure that development is supported by adequate wastewater infrastructure, including necessary network upgrades. Infrastructure requirements will continue to be informed through engagement with wastewater providers and reflected in the Infrastructure Delivery Plan, where appropriate.	Policy wording has been amended.

implications of unadopted SuDS schemes and roads.		
The Working Group Against Over Development and CPRE Sussex • Agrees with draft Policy INF4. • Concerned that "wherever feasible" in point 5 makes avoidance of undergrounding power cables too easy. • Recommended rewording point 5 so overhead power lines should be provided underground unless exceptional circumstances demonstrate this is not feasible.	• Policy INF4 seeks to ensure that development is supported by adequate wastewater infrastructure, including necessary network upgrades. Infrastructure requirements will continue to be informed through engagement with wastewater providers and reflected in the Infrastructure Delivery Plan, where appropriate.	Policy wording has been amended.
The Marquess of Christopher Abergavenny • Objects to draft Policy INF4. • Considers utility companies should be legally obliged to keep up with demand and provide national infrastructure in the public interest to support investment, growth and Local Plan allocations.	• The planning system must ensure that development is supported by adequate infrastructure and that any capacity constraints are appropriately identified and addressed. Policy INF4 therefore seeks to ensure that infrastructure requirements are considered at both the plan-making and decision-taking stages.	No policy change.
Clarity Ecoworks • Supportive of draft Policy INF4.	• Comment of support noted.	No change required.
Beal's Farm Charcuterie • Objects to draft Policy INF4.	• The planning system must ensure that development is supported by adequate infrastructure and that any capacity constraints are appropriately identified and	No policy change required.

• Considers utility companies should be legally obliged to keep up with demand and provide national infrastructure in the public interest to support investment, growth and Local Plan allocations.	addressed. Policy INF4 therefore seeks to ensure that infrastructure requirements are considered at both the plan-making and decision-taking stages.	
Rotherfield Protection Group • Supportive of draft Policy INF4. • Concerns about local infrastructure and services accommodating additional demand, particularly wastewater treatment, surface water drainage and utilities.	• The planning system must ensure that development is supported by adequate infrastructure and that any capacity constraints are appropriately identified and addressed. Policy INF4 therefore seeks to ensure that infrastructure requirements are considered at both the plan-making and decision-taking stages.	No policy change required.
Residents Associations **Dicker Residents Association** • Agrees with draft Policy INF4. • Concerned that utilities may be inadequate to support housing numbers across the district. • Suggested greater emphasis on reducing utility demand through measures such as solar panels, ground source heating, brown water separation/storage/use, and better building design.	• The Council welcomes support for Policy INF4, which seeks to ensure growth is supported by appropriate utility infrastructure. • Together with policies on sustainable design, energy efficiency, renewable energy, and water efficiency, it will help reduce infrastructure demand, use resources efficiently, and support sustainable growth.	No change required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**

Uckfield Town Council • Supports Policy INF4 but seeks stronger safeguards to ensure utility infrastructure is in place before development is occupied. • Raises concerns about drainage and sewage infrastructure, including treatment works location, drainage design, and maintenance. • Recommends preventing sewage discharges to watercourses and requiring early drainage planning, route assessment, and enforceable infrastructure delivery arrangements.	• The Council welcomes support for draft Policy INF4. The policy seeks to ensure that development is coordinated with the provision of necessary utility and drainage infrastructure. • Detailed matters relating to sewerage capacity, drainage design and water quality will be considered through the planning application process in consultation with relevant infrastructure providers and statutory bodies.	No policy change required.
Horam Parish Council • Objects to Policy INF4, seeking inclusion of telecommunications and broadband as essential infrastructure. • Argues broadband should be treated as a core utility despite separate digital communications policies. • Recommends requiring all utility infrastructure to be installed and operational before first occupation of development.	• The policy has been strengthened to ensure that development is supported by the timely provision of necessary utility and drainage infrastructure, supported by proportionate evidence demonstrating that sufficient capacity is available or can be delivered to serve the development.	Amended policy wording.

Isfield Parish Council • Broadly supports draft Policy INF4. • Notes that infrastructure issues should be treated on a cumulative basis.	• The Council welcomes broad support for Policy INF4. • The Council agrees that infrastructure requirements should be considered cumulatively and has assessed the impacts of planned growth on infrastructure provision through the Local Plan evidence base and Infrastructure Delivery Plan to ensure that future needs are identified and addressed.	No policy change required.
Heathfield & Waldron Parish Council • Supports Policy INF4 but seeks clarification on how adequate surface water and wastewater capacity will be demonstrated. • Recommends considering Approved Document H requirements and clarifying when cesspools may be appropriate. • Raises concerns about the ability of water infrastructure to support growth, given uncertainty over investment timescales and the proposed reservoir delivery date.	• The Council welcomes support for Policy INF4. • Infrastructure capacity requirements will be assessed proportionately, informed by consultation with infrastructure providers and statutory consultees. • Drainage and wastewater matters will be considered through the planning application process. • The Council will continue working with water companies to ensure future infrastructure needs are reflected in the Local Plan evidence base and Infrastructure Delivery Plan.	No policy change required.
Polegate Town Council • Agrees with draft Policy INF4. • No change required. • Considered that nothing is missing from the draft Policy.	• Comment of support noted.	No change required.
Westham Parish Council • Agrees with draft Policy INF4.	• The Council welcomes support for draft Policy INF4. • The policy requires development to be supported by adequate wastewater and drainage infrastructure,	No change required.

• Suggested points 1 and 2 need to be rigorously enforced. • Considers drainage/sewage capacity should be increased at all points, not just site connections, to ensure the existing network can accommodate increased demand.	including any necessary upgrades to accommodate additional demand. • The Council agrees that capacity considerations should extend beyond site-specific connections to the wider network and will continue to work with infrastructure providers to identify, manage and address any infrastructure constraints.	
Arlington Parish Council • Agrees with draft Policy INF4. • Suggests retrofitting living elements, such as sedum • Considers such measures could reduce pressure on drainage systems, provide insulation, absorb rainwater and deliver environmental benefits including biodiversity, stormwater management and aesthetic enhancements.	• The Council welcomes support for draft Policy INF4. • The Council recognises the benefits of green infrastructure measures, including green and living roofs, in reducing surface water runoff, enhancing biodiversity, improving building performance and supporting climate resilience. These matters are addressed through the Local Plan's design, climate change and green infrastructure policies.	No change required.
Laughton Parish Council • Broadly agrees with draft Policy INF4. • Suggests that community energy schemes should be encouraged. • Suggests the Council should work with and encourage community energy schemes.	• The Council welcomes broad support for draft Policy INF4. • The Council recognises the potential contribution of community energy schemes to increasing renewable energy generation, improving energy resilience and supporting the transition to a low-carbon future. • Support for community-led energy initiatives is addressed through the Plan's renewable energy and climate change policies.	No change required.
Frant Parish Council • Agrees with draft Policy INF4.	• The Council welcomes support for draft Policy INF4. • The use of Grampian-style conditions is an established mechanism available to the Council where necessary to	No change required.

• Suggests the draft Policy should refer to the use of Grampian conditions to ensure necessary utility provision is implemented prior to occupation.	ensure that required infrastructure is delivered before development is occupied. Specific reference within Policy is not necessary.	
Chiddingly Parish Council • Supportive of draft Policy INF4. • Suggests the draft Policy should also apply to all infrastructure projects, including health, education and roads. • Suggests a strategic plan should be in place for all supporting infrastructure from the outset, based on joined-up working.	• The Council welcomes support for draft Policy INF4. • The policy applies to all forms of infrastructure required to support planned growth, including utilities, transport, education, healthcare and community facilities. • Infrastructure requirements have been identified through the Local Plan evidence base including Infrastructure Delivery Plan, which has been informed by engagement with infrastructure providers and other stakeholders.	No change required.
Mayfield and Five Ashes Parish Council • Suggests water supply and wastewater infrastructure should be delivered in step with growth and population increases. • Recommends early and ongoing engagement between the Council and utility providers throughout plan implementation. • Suggests utility companies should be consulted on relevant planning applications.	• The Council agrees that water supply, wastewater and other utility infrastructure should be planned and delivered alongside growth. • The Council has engaged with utility providers throughout the preparation of the Local Plan and Infrastructure Delivery Plan and will continue this engagement as the Plan progresses. • Policy INF4 seeks to ensure that development is supported by adequate infrastructure capacity.	No change required.
Rotherfield Parish Council • Supportive of draft Policy INF4.	• Comment of support noted. • This has been amended.	Reference amended.

• Notes that paragraph 9.61 should refer to INF6 rather than INF5.		
Buxted Parish Council • Supportive of draft Policy INF4.	• Comment of support noted.	No change required.
Berwick Parish Council • Supportive of draft Policy INF4. • Sought assurances that sewerage infrastructure has capacity for proposed developments. • Raised concerns that committed dwellings, Local Plan allocated dwellings and windfall allowance would significantly increase demand on the sewerage system, which is already at capacity.	• TThe Council has worked with and will continue to work with wastewater providers to understand capacity constraints, identify any necessary infrastructure improvements, and reflect relevant requirements through the Infrastructure Delivery Plan.	No change required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Support/no change required • Support for the policy	• Comment of support noted.	No change required.
Policy wording and scope • Objects to Policy INF4, seeking flexibility for the Council to depart from Southern Water advice where evidence supports doing so. • Recommends restructuring policy wording, including separate treatment of Clause 4 provisions.	• Comments noted. Policy INF4 has been strengthened to ensure that development is supported by appropriate utility infrastructure, with proposals required to demonstrate that adequate capacity is available, or can be provided, to meet development needs without prejudicing existing or future provision. • The Council notes comments relating to telecommunications and digital connectivity. These matters are addressed through Policy INF6.	Policy wording amended.

• Seeks inclusion of broadband and telecommunications as infrastructure requirements. • Recommends requiring all utility infrastructure to be operational before first occupation.		
Utility capacity, timing and delivery • Suggests integrated utility provision through common utility trenching. • Recommends assessing infrastructure needs cumulatively and using mechanisms such as Grampian conditions to ensure infrastructure is delivered before occupation. • Seeks timely utility provision, including water and wastewater capacity in the Pevensey Levels catchment, supported by construction management planning. • Emphasises the need for effective monitoring and enforcement to ensure agreed infrastructure is delivered.	• The Council agrees that infrastructure requirements should be assessed on a cumulative basis, and this has informed the preparation of the Infrastructure Delivery Plan and other evidence base documents such as the Sustainability Appraisal. • Policy INF4 seeks to ensure that the necessary infrastructure is delivered in step with development, with appropriate planning conditions, obligations and other mechanisms used where justified. • Matters relating to utility provision during construction and occupation will be considered through the development management process.	No change required.
Surface water, SuDS and sewage management	• The Council recognises the importance of ensuring that surface water drainage and wastewater systems are	No change required.

• Suggests restricting development in areas with existing surface water issues. • Raises concerns about the cost, complexity, management, and long-term maintenance of SuDS and sewage infrastructure. • Seeks clarity on adoption and management arrangements, including protection from unforeseen resident costs. • Recommends requiring costed maintenance plans, legally enforceable adoption arrangements, and a review of the implications of unadopted SuDS schemes and roads.	sustainable, deliverable and capable of being maintained in the long term. • Detailed matters relating to SuDS design, adoption, maintenance and management arrangements will be considered through the planning application process in consultation with the relevant statutory bodies and infrastructure providers.	
Southern Water, wastewater and drainage concerns • Raises concerns about Southern Water services and the ability of infrastructure to accommodate planned growth. • Suggests utility providers should be required to deliver capacity in line with demand, with upgrades completed before further development proceeds. • Questions whether drainage and water infrastructure can cope with future growth and changing rainfall	• The Council acknowledges concerns regarding wastewater infrastructure capacity and the delivery of upgrades to support growth. • Policy INF4 requires development to be supported by adequate infrastructure capacity, including any necessary improvements to wastewater and drainage networks. • Infrastructure requirements will continue to be informed by engagement with utility providers and reflected in the Infrastructure Delivery Plan where appropriate.	No change required.

patterns, and whether overloaded infrastructure can constrain development.		
Water supply and reservoirs • More reservoirs should be built and water infrastructure improved before any more housing development is considered. • Concerns raised about local water demand exceeding supply. • The district needs another reservoir to support present and future growth.	• The Council recognises the importance of ensuring that water supply infrastructure keeps pace with planned growth. • The Local Plan and Infrastructure Delivery Plan have been informed by ongoing engagement with water companies regarding future water resource and supply requirements. • Policy INF4 seeks to ensure that development is supported by adequate water infrastructure capacity.	No changes required.
Wider infrastructure, consultees and scrutiny • Suggest that planning permission is currently granted without adequate investigation, citing examples relating to electricity supply, sewage and school capacity. • Suggest that education, power supply, broadband and mobile phone providers should be added to the list of consultees. • Raise concerns about lack of third-party scrutiny if provision stalls. • Raise concerns about the impact of new development on roads.	• Comments noted. The Council agrees that the impacts of development on infrastructure must be properly understood and assessed. Relevant infrastructure providers and statutory consultees are engaged through the plan-making and development management processes as appropriate. The Infrastructure Delivery Plan identifies infrastructure requirements arising from planned growth, including transport, education, utilities and other community infrastructure.	No change required.

• Raise concerns about road capacity and maintenance, electricity capacity on Chiddingly Road, gas network capacity and broadband capacity.		
Transparency and general support • Consider adherence to the policy principles to be vital. • Suggest that planning and delivery should be transparent, with every opportunity for public consultation taken.	• The Council welcomes support for the objectives of Policy INF4. • The preparation and implementation of the Local Plan is subject to statutory consultation requirements, and the Council will continue to engage with infrastructure providers, stakeholders and local communities to support the transparent delivery of infrastructure alongside growth.	No change required.

Policy INF5: Safeguarding of Infrastructure

Wealden Local Plan – Regulation 18 Consultation

Total: 100	Support: 86	Neutral: 4	Object: 10

Policy INF5 – Safeguarding of Infrastructure		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
National Highways • The A27 Lewes to Polegate scheme remains uncommitted, with no guarantee it will be taken forward for further development work.	• Comment noted.	No action required.

East Sussex County Council • Supports draft Policy INF5. • Requests amendments to supporting text on Lewes–Uckfield Railway Line, Eridge to Tunbridge Wells rail link and offline A27 project to align with draft East Sussex LTP4. • Requests reference to carbon in construction chains within paragraph 9.48.	• Support for Policy INF5 is welcomed. • The supporting text has been reviewed to ensure references to the Lewes–Uckfield railway line, the Eridge–Tunbridge Wells rail link and the offline A27 proposal are consistent with the latest East Sussex Local Transport Plan 4 (LTP4). • The reduction of carbon emissions associated with construction materials and supply chains is supported through the Local Plan's wider climate change mitigation objectives.	Supporting text amended
Network Rail • Supports draft Policy INF5. • Supports retaining safeguarding designations for the Lewes to Uckfield and Eridge to Tunbridge Wells lines. • Suggests development near the safeguarded routes could strengthen the business case for reopening. • Welcomes the Council's focus on sustainable transport and reduced reliance on cars. • Highlights ongoing work on "First & Last Mile" connectivity.	• The Council welcomes support for safeguarding the Lewes–Uckfield and Eridge–Tunbridge Wells rail corridors and recognises that future growth could strengthen the case for rail reinstatement. • Support for sustainable transport and reducing car dependency is welcomed. • The Council will continue to support improved public transport access and first-and-last-mile connectivity.	No action required.

South East Water Limited • Supports inclusion of draft Policy INF5. • Supports safeguarding land for a new Arlington Reservoir. • Requests wording to refer to a new reservoir rather than an extension. • Requests further engagement on the HRA and future updates to the Water Resources Management Plan.	• The Council welcomes support for Policy INF5 and safeguarding land for the proposed new Arlington Reservoir. • The policy has been updated to reflect the reservoir proposal and safeguards land needed for its delivery. • The Council welcomes continued engagement on the Habitats Regulations Assessment and future Water Resources Management Plan updates.	Policy wording and supporting text amended.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Tunbridge Wells Borough Council • Supports draft Policy INF5 and safeguarding the Eridge to Tunbridge Wells railway line.	• Comment of support noted.	No action required.
Eastbourne Borough Council • Supports draft Policy INF5 and safeguarding any potential future route for offline A27 improvements between Lewes and Polegate.	• Comment of support noted.	No action required.
Lewes District Council • Notes that safeguarding the former Lewes to Uckfield railway line is consistent with LDC Policy IC10.	• Comment noted.	No action required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**

Developers and land agents **Firle Estate (Strutt & Parker)** • Supports draft Policy INF5 in principle. • Requests deletion of part 3 0f the policy - Development will also not be permitted which would compromise the delivery of any offline improvements to the A27 between Lewes and Polegate.	• Support for Policy INF5 in principle is welcomed. • The request to delete Part 3 of the policy is noted. The policy has been reviewed and strengthened to ensure that development will not be permitted where it would prejudice the delivery of any offline improvements to the A27 between Lewes and Polegate.	Policy has been amended.
Folkington Estate • Supports draft Policy INF5 in principle but raises concerns about offline A27 impacts on the Folkington Estate and Grade II* Wootton Manor setting. • Considers online improvements would be less damaging and less costly. • Requests safeguarding to apply to both online and offline A27 improvements.	• The Council welcomes in-principle support for Policy INF5 and notes concerns about the potential impacts of an offline A27 route on heritage assets and the Folkington Estate. • The policy safeguards future transport improvement options while further assessment and feasibility work are undertaken.	No action required.
Tarmac Trading Limited (Heatons) • Requests reference to minerals and waste infrastructure, including Ninfield Block Plant. • Suggests cross-reference to emerging and existing Waste and Minerals safeguarding policies.	• The IDP cross-references to the existing adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan safeguarding policies, and any relevant emerging policy updates where appropriate.	No action required.
Organisations with specific interests **The Working Group Against Over Development, CPRE Sussex**	• Support for Policy INF5 is welcomed. The Council notes the concerns raised regarding the potential landscape impacts of an offline A27 route and the possibility that such infrastructure could facilitate additional development. These matters have been	No action required.

• Supports draft Policy INF5 but objects to an offline A27 due to landscape impacts and potential to unlock additional housing development. • Raises concerns about economic viability of reinstating the Lewes–Uckfield railway line.	considered and will continue to be considered alongside the relevant evidence base and environmental assessments. • The concerns regarding the economic viability of reinstating the Lewes–Uckfield railway line are also noted.	
Village Concerns, Grassroots Planning and Landspeed • Supports draft Policy INF5.	• Comment of support noted.	No action required.
Transport Futures East Sussex • Supports safeguarding the Lewes to Uckfield and Eridge to Tunbridge Wells railway lines. • Objects to offline A27 improvements as car-based and inconsistent with accessibility-led planning.	• Support for safeguarding the Lewes–Uckfield and Eridge–Tunbridge Wells rail corridors are welcomed. • Policy INF5 seeks to safeguard strategic transport options while supporting a shift towards more sustainable travel choices. Any future transport schemes would be subject to separate assessment and decision-making processes.	No action required.
Clarity Ecoworks • Supports draft Policy INF5. • Suggests safeguarding sites for future transport methodologies, such as electric air taxis, particularly near existing rail and road infrastructure.	• Support for Policy INF5 is welcomed. While the Council recognises the potential for future innovation in the transport sector, the Local Plan focuses on infrastructure needs that are currently evidenced and reasonably foreseeable.	No action required.
Uckfield Chamber of Commerce • Supports draft Policy INF5. • Broadly agrees with reinstating the Lewes–Uckfield rail link and Eridge–Tunbridge Wells improvements, while noting delivery challenges.	• Support for Policy INF5 is welcomed. • The suggestion that former railway corridors could support walking and cycling routes where rail reinstatement is not achievable is also noted and aligns with the Council's objectives to enhance sustainable and active travel networks.	No action required.

• Supports use of old railway lines for cycling and walking if rail reinstatement proves too ambitious.		
Friends of the South Downs • Supports draft Policy INF5 and safeguarding of rail routes that improve access to the Downs. • Notes the proposed Stone Cross station is not mentioned. • Raises concern about safeguarding an offline A27 when no route has been decided.	• The Council welcomes support for Policy INF5, including safeguarding rail corridors that could improve access to the South Downs. • There are no plans for a rail station at Stone Cross . • Strategic transport interventions, including the offline A27 improvements have been assessed through the evidence base, including the IDP and the Council will continue to balance transport, environmental and sustainability considerations in the development of future infrastructure proposals.	No action required.
Richborough • Supports draft Policy INF5 in principle. • Notes land for A27 improvements is not shown on the Policies Map or identified in the policy wording. • Requests safeguarded land for RIS4 works to be identified and proportionate, avoiding protected/designated areas.	• Support for Policy INF5 is welcomed. • The IDP includes the proposed A27 improvements, while the supporting text to the policy specifically refers to the A27 Offline Scheme. • The Council also notes the request that any safeguarded land associated with future RIS4 proposals should avoid, where possible, designated and environmentally sensitive areas.	No action required.
Sussex Wildlife Trust • Objects to draft Policy INF5 part 3 and requests its deletion. • Considers offline dual carriageway safeguarding inconsistent with decarbonised, sustainable transport objectives. • Requests further justification and clarity on the safeguarded area. • Raises uncertainty about interaction between A27 safeguarding and Arlington Reservoir proposals.	• The objection to Part 3 of Policy INF5 is noted. Concerns noted regarding the compatibility a potential offline A27 improvement with wider objectives for decarbonisation and sustainable transport. • The policy does not promote or commit to a particular scheme and instead seeks to ensure that potential strategic transport infrastructure options are not prejudiced while further evidence, assessment and decision-making are undertaken.	No action required.

Railfuture Limited • Supports draft Policy INF5 in principle. • Requests references to East Sussex Rail Strategy and Action Plan and TfSE Strategic Investment Plan. • Suggests policy should acknowledge both historic alignment safeguarding and potential future alignment options for Uckfield–Lewes rail. • Requests clarity on Spa Valley Railway implications and Tunbridge Wells destination station aspirations.	• Draft Policy INF5 is supported in principle. • Supporting text has been updated to reference relevant rail, transport, and water resource strategies. • The policy safeguards both the historic rail alignment and potential future route options for reinstatement. • It does not preclude the operation or enhancement of existing rail infrastructure, and the Council will continue to consider future transport infrastructure proposals as evidence emerges.	Supporting text amended.
Residents Associations **Willingdon Residents' Association** • Agrees with draft Policy INF5. • Prefers telephone masts to be located in industrial areas rather than urban areas due to visual impacts.	• Support for Policy INF5 is welcomed. • The siting of telecommunications infrastructure is largely determined by technical, operational, and coverage requirements. • Proposals will continue to be assessed on their individual merits, having regard to visual amenity, landscape character and technical requirements.	No action required.
Dicker Residents Association • Supports draft Policy INF5 but raises concerns about the offline A27 proposal. • Considers the proposal expensive, likely to create additional demand and inconsistent with reducing car ownership and use.	• Support for Policy INF5 is welcomed. The concerns raised regarding the offline A27 proposal are noted. • The policy seeks to safeguard strategic transport options and does not in itself commit to the delivery of any specific scheme. Any future proposals would be subject to separate business case development, environmental assessment and decision-making processes.	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Rotherfield Parish Council	• Comment of support noted.	No action required.

• Supports draft Policy INF5.		
Horam Parish Council • Disagrees with draft Policy INF5. • Requests inclusion of the direct Polegate to Westham route within safeguarded railway lines. • Considers the route could improve connections and support sustainable travel.	• Comment of objection noted. • Policy INF5 seeks to safeguard strategic transport options while supporting a transition towards more sustainable modes of travel. Any future transport schemes, including a direct route between Polegate and Westham, would be subject to separate assessment, consultation and decision-making processes.	The policy has been reviewed and updated to include the Willingdon Chord as a safeguarded rail link route.
Heathfield & Waldron Parish Council and Buxted Parish Council • Support draft Policy INF5.	• Comment of support noted.	No action required.
Isfield Parish Council • Sceptical about the likelihood of re-establishing the Uckfield–Lewes railway link, particularly on the original alignment, due to land ownership and reconstruction issues.	• The comment regarding the deliverability and feasibility of reinstating the Uckfield-Lewes rail link have been noted	No action required.
Uckfield Town Council • Supports draft Policy INF5. • Agrees that development should not be permitted on land required to reinstate the Lewes to Uckfield line.	• Comment of support noted.	No action required.
Arlington Parish Council • Disagrees with draft Policy INF5. • Supports safeguarding railway routes but objects to offline A27 improvements as car-based and inconsistent with accessibility objectives.	• The objection to draft Policy INF5 is noted. • While the Local Plan prioritises sustainable transport and accessibility objectives, the policy recognises that strategic highway interventions may also have a role in supporting network resilience, connectivity and economic growth.	No action required.

Laughton Parish Council • Broadly agrees with the policy. • Expects extensive local consultation if any offline A27 improvements are proposed.	• Support for draft Policy INF5 is welcomed and noted. • Any such proposals would be subject to appropriate consultation and engagement processes as they are developed.	No action required.
Mayfield and Five Ashes Parish Council • Agrees with Policy INF5. • Supports using the redundant Cuckoo Line track from Rotherfield through Mayfield to Heathfield as a cycleway and footpath.	• Support noted.	No action required.
Polegate Town Council • Supports draft Policy INF5. • Requests assurance that future schemes will be sustainable in the longer term and address congestion/bottlenecks in Polegate.	• Support for draft Policy INF5 is welcomed and noted. • The need for future transport schemes to provide sustainable long-term solutions and address existing congestion and bottlenecks, including those affecting Polegate, is recognised.	No action required.
Crowborough Town Council • Would like rail transport services improved, including rail line extension, electrification and dual tracking.	• Support for improvements to rail services, including line extensions, electrification and additional track capacity, is noted. Although the Council is not the statutory provider for rail services and improvements.	No action required.
Hailsham Town Council • Notes Policy INF5 refers to A27 improvements but not the A22. • Considers the scale and timing of development in Hailsham and along the A22 corridor depends on delivery of capacity improvements. • Requests policy clarity on phasing and contributions to improvements.	• The comments are noted. • The importance of transport capacity improvements in supporting planned growth, particularly in Hailsham and along the A22 corridor, is recognised and is reflected through the Council's infrastructure planning and evidence base. • The Council considers it appropriate to retain flexibility so that infrastructure requirements, phasing, mitigation measures and any necessary developer contributions can be informed by future	No action required.

	evidence and infrastructure planning, and secured in accordance with national policy and relevant legislation.	
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Local Residents • **Principle of policy:** A large number of residents support Policy INF5 and consider no changes are required. • **Rail safeguarding:** Residents raised support for the Lewes–Uckfield and Eridge–Tunbridge Wells links, with some calling for urgent reopening, developer funding, or safeguarding of additional rail routes such as the Willingdon Chord and Polegate to Westham route. • **Active travel:** Some residents suggested using pre-existing railway track beds for cycleways/footpaths while rail schemes remain unbuilt. • **A27 improvements:** Objections were raised to a new offline A27 on climate, cost, sustainability and induced traffic grounds. • **Water infrastructure:** Comments noted the need for additional water infrastructure to support development and concerns about the timing of SE Water reservoir expansion. • **Policy scope:** Some residents suggested infrastructure projects should be actively pursued, while others argued the policy should be deleted if 20-minute towns reduce the need for travel.	• **Principle of the policy:** Support for draft Policy INF5 is welcomed and noted. • **Rail safeguarding:** The Council recognises the potential role of rail infrastructure in supporting sustainable connectivity and will continue to consider safeguarding measures through Policy INF5 and the supporting evidence base. • **Active travel:** The potential use of former railway corridors to support active travel and enhance connectivity is acknowledged and will continue to be considered through relevant transport and infrastructure planning work. • **A27 improvements:** Strategic transport interventions, including the offline A27 improvements have been assessed through the evidence base, including the IDP and the Council will continue to balance transport, environmental and sustainability considerations in the development of future infrastructure proposals. • **Water infrastructure:** This matter is addressed through the Council's wider infrastructure planning work and ongoing engagement with relevant infrastructure providers. • **Policy scope:** The Council considers that safeguarding strategically important infrastructure corridors remains necessary to support the long-	No action required.

	term delivery of infrastructure required to meet future needs.	
Other Comments	**WDC Response**	
• No comments received.	• No response required.	• No action required.

Policy INF6: Digital and Communications Infrastructure

Wealden Local Plan – Regulation 18 Consultation

Total: 78	Support: 72	Object: 3	Neutral: 3

Policy INF6 - Digital and Communications Infrastructures		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
• No comments.	n/a	n/a
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
• No comments.	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Hertfordshire Holdings Tor & Co **Developers and land agents** • Suggest digital infrastructure submission requirements should be clearly set out in the local validation checklist, subject to further consultation.	• Detailed planning application requirements are more appropriately set out in the Local Validation Checklist, which is prepared and consulted upon through a separate process.	No action required.

<u>Organisations with specific interests</u> **The Working Group Against Over Development, CPRE Sussex and Clarity Ecoworks** • Support draft Policy INF6.	• Comments of support are noted.	No action required.
Village Concerns • Support draft Policy INF6. • Consider mobile coverage to be patchy and incomplete in rural areas, with indoor reception often insufficient. • Suggest mapping of mobile phone coverage should form part of any assessment. • Consider broadband access to vary widely, with rural areas experiencing digital poverty and limited full fibre access. • Suggest Policy INF6 should specify sufficient mobile telecommunications coverage internally and externally, with clearer supporting text in paragraph 9.72.	• Comments of support are noted. • Policy INF6 has been strengthened to support improved digital connectivity and reduce inequalities in broadband and mobile coverage, particularly in rural areas. • Development proposals must demonstrate that design and layout support effective broadband and mobile connectivity, with adequate internal and external coverage. • The Council considers the policy provides an appropriate and flexible framework to support digital infrastructure and evolving connectivity needs.	Policy wording has been amended
Uckfield Chamber of Commerce • Support draft Policy INF6. • Support improved broadband and digital communications to attract and retain businesses across town centres and rural villages. • Recognise recent improvements and encourage continued investment.	• Support for draft Policy INF6 is welcomed and noted. • The Council recognises the important role that high-quality digital connectivity plays in supporting economic growth, business resilience and flexible working.	No action required.

	• The Council supports continued investment in digital infrastructure to ensure that communities and businesses across the district benefit from reliable, resilient and future-proof connectivity.	
<u>Residents Associations</u> **Dicker Residents' Association** • Support draft Policy INF6.	• Comment of support welcomed.	No change required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council • Support draft Policy INF6. • Consider digital and communications infrastructure vital to social inclusion, quality of life and economic development in rural areas. • Suggest WDC should prepare a plan for improving communications infrastructure for existing homes, businesses and domestic users. • Consider the policy should address mobile telephone signal and digital radio signal issues.	• Comments of support are noted. • Policy INF6 is primarily concerned with ensuring that new development is supported by appropriate digital and communications infrastructure and that opportunities to enhance connectivity are secured through the planning process.	The policy/supporting text strengthened to recognise the importance of digital connectivity in rural areas.
Horam Parish Council • Object to draft Policy INF6. • Suggest all new residential and employment-generating development should demonstrate sufficient mobile telecommunications coverage.	• Comments of objection are noted. • The Policy seeks to ensure that new development is designed to meet modern digital connectivity requirements by facilitating effective broadband and mobile connectivity, including adequate	No action required.

	telecommunications coverage both internally and externally.	
Laughton Parish Council, Heathfield & Waldron Parish Council and Uckfield Town Council • Support draft Policy INF6.	• Comments of support are noted.	No action required.
Rotherfield Parish Council • Support draft Policy INF6. • Identify drafting errors: duplicate "however" in paragraph 9.73 and reference to INF5 in paragraph 9.74 should be INF6.	• Comments of support are noted. • The identified drafting errors in paragraphs have been corrected.	The identified drafting errors have been corrected.
Polegate Town Council • Support draft Policy INF6. • Consider digital communication to be poor in some rural parts of the district. • Suggest developers should provide assurances that they have engaged with providers.	• Comments of support are noted. • Wider roll-out of telecommunications, broadband and digital radio infrastructure is largely delivered by infrastructure providers and other programmes, however, the Policy has been updated to better recognise rural connectivity challenges and promote improvements to both broadband and mobile telecommunications infrastructure.	Policy wording has been amended
Local Residents	**WDC Response**	**Changes made to policy/chapter**
• **Principle of policy:** Many local residents support Policy INF6 and several state that no change is required. • **Mobile coverage:** Residents identify patchy mobile network coverage, particularly in rural areas, and suggest WDC should liaise with operators to improve coverage.	• Policy INF6 has been strengthened to support improved broadband and mobile connectivity, particularly in rural areas and locations with poor digital access. • New development must provide effective internal and external broadband and mobile coverage,	Policy wording amended.

• **Internal and external reception:** Residents suggest new residential and employment-generating development should demonstrate sufficient mobile telecommunications coverage both internally and externally. • **Broadband and full fibre:** Residents highlight disparities between urban and rural broadband access, including existing homes missed from fast fibre roll-out and limited full fibre access in rural areas. • **Existing infrastructure:** Residents suggest existing coverage should be brought up to standard before additional development and ask whether remedial works for existing homes can be addressed through the Plan. • **Community consultation:** Residents suggest community consultation and local agreement should take place before introducing new technology, including 5G infrastructure. • **Monitoring and governance:** Residents suggest third-party monitoring of providers and local working groups to ensure digital infrastructure supports commerce, high streets and working from home. • **Policy strengthening:** Suggestions include upgraded infrastructure, equal access, remote work support and continuous policy review to keep pace with technological change.	including gigabit-capable infrastructure such as FTTP where feasible. • The policy supports expanded and upgraded digital infrastructure, community engagement, and resilient, future-proof connectivity, while retaining flexibility to respond to changing technologies and local circumstances.	
Other Comments	**WDC Response**	
No comments.	n/a	n/a

Policy INF7: Local Services and Community Facilities

Wealden Local Plan – Regulation 18 Consultation

Total: 83	Support: 66	Neutral: 11	Object: 6

Policy INF7 – Local Services and Community Facilities		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
East Sussex County Council (ESCC) • Supportive of draft Policy INF7. • Suggests the supporting text should expand on health and wellbeing benefits, including mental health, reduced social isolation and community cohesion. • Suggests developments without on-site services/facilities should provide good accessible links to existing facilities. • Recommends that Criterion 2 should refer to working with developers, communities and relevant organisations. • Considers that schools and libraries should sit outside draft Policy EC8 due to statutory governance and equality duties.	• Comments of support noted. • Supporting text has been strengthened to recognise the role of community facilities in promoting wellbeing, reducing isolation, and supporting community cohesion. • Policy INF7 promotes accessible facilities through sustainable transport links, whether provided on-site or elsewhere. • The policy and supporting text have been revised to encourage collaboration between developers, communities, and service providers in delivering facilities that meet local needs. • Comments on schools and libraries are noted, and the Council considers Policy EC8 appropriately reflects the relevant statutory responsibilities and governance arrangements.	Policy and supporting text has been amended.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**

Eastbourne Borough Council (EBC) • Suggests draft Policy INF7 should refer to cross-boundary implications. • Looks forward to working with WDC through the duty to cooperate process and with infrastructure providers to identify cross-boundary infrastructure provision and strategic infrastructure priorities.	• Comments noted. • Cross-boundary infrastructure matters have been considered through the Local Plan evidence base, including the Sustainability Appraisal and infrastructure planning work. The Council will continue to address strategic cross-boundary issues through ongoing engagement with neighbouring authorities, infrastructure providers and other relevant bodies.	No change required.
Kent County Council • Notes that 477 dwellings adjoining Tunbridge Wells town may impact school capacity in Kent. • Requests that allocation policies should include requirements for education impact assessment and mitigation agreed with KCC before homes are granted consent. • Requested full capital costs for additional school places be secured through Section 106 contributions where required.	• Comments noted. • Education impacts from sites near the Kent boundary have been considered through evidence studies, site allocations, and ongoing engagement with Kent County Council. • The Council will continue working with KCC to assess education needs and identify any necessary mitigation. • Where development creates demand for additional education infrastructure, appropriate mitigation, including financial contributions where robustly justified, will be secured through planning obligations.	No change required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**

<u>Developers and land agents</u> **Hertfordshire Holdings (Tor & Co)** • Requested clarity on the respective roles of CIL and Section 106 agreements in infrastructure provision.	• Comment noted. CIL supports the delivery of strategic infrastructure needed to accommodate growth, while Section 106 agreements mitigate site-specific impacts and secure measures necessary to make development acceptable. • Infrastructure requirements and funding mechanisms will be secured in accordance with national policy and legislative requirements.	No change required.
Grosvenor Property UK Limited • Supportive of draft Policy INF7. Notes that community hubs of different sizes and functions will sit at key locations in the North West Hailsham new neighbourhood.	• Comments of support noted. • The support for mixed and flexible community hubs is welcomed. • The consideration of NW Hailsham is set out in the site specific evidence base.	No change required.
Landspeed • Supportive of draft Policy INF7. • Suggested draft Policy EC8 should apply to all local services and community facilities, including publicly owned services and facilities.	• Comment of support noted. • Policy INF7 is intended to apply to local services and community facilities irrespective of ownership. Policy EC8 has been reviewed and amended to provide greater clarity on the scope of the policy.	No change to INF policy but cross-refer to EC8 for changes.

Savills • Suggested WDC should explore opportunities for enhancement/provision, including land at Walsh Manor, Crowborough.	• Comment noted. • Site-specific opportunities for community facilities and infrastructure have been considered through the site assessment, allocation and infrastructure planning. • The Council will continue working with landowners, developers, infrastructure providers and other stakeholders to deliver appropriate infrastructure improvements through the planning process.	No change required.
<u>Organisations with specific interests</u> **Village Concerns** • Supportive of draft Policy INF7. • Suggests Policy EC8 should apply to all local services and community facilities. • Requests a requirement to explore alternatives and involve the community. • Suggests Policies INF7 and EC8 should require effective communication with relevant communities.	• Policy INF7 applies to local services and community facilities, while Policy EC8 has been clarified to better define its scope and coverage. • Loss of a facility will only be supported where it is demonstrated to be no longer needed and alternative community uses have been considered. • Supporting text has been strengthened to promote collaboration between developers, communities, and service providers in delivering appropriate facilities and supporting community engagement.	No change to INF policy but supporting text has been strengtheneds.
The Working Group Against Over Development and CPRE Sussex • Broadly supportive of draft Policy INF7. • Considers the policy appears to apply mainly to commercial services and facilities and should include public services and facilities.	• The comment is noted. The policy is intended to apply to local services and community facilities more broadly and is not limited to commercial uses.	No change required.

NHS Property Services • Supports Policy INF7 but seeks clarification on policy interpretation and definitions. • Raises concerns that restrictions on the loss of community facilities could limit NHS estate flexibility and service transformation. • Recommends allowing alternative uses for surplus NHS land and property where formally identified as no longer required, and avoiding requirements that could delay reinvestment in healthcare services.	• Comments of support noted. • The policy has been strengthened to clarify that the loss of a community facility will only be supported where robust evidence demonstrates that one of the policy tests is met, and Criterion 7 has been deleted. • The policy allows flexibility where facilities are no longer needed, viable, or suitable, or where equivalent replacement provision is secured. • The Council recognises the importance of investment in modern healthcare facilities while ensuring community facilities are not lost where the relevant policy tests are met.	Policy wording has been updated.
<u>Residents Associations</u> **Dicker Residents' Association** • Supportive of draft Policy INF7. • Suggested caution around electric vehicle infrastructure, noting concerns that current electric cars may not be viable in the long term.	• Comment of support noted. • The policy is primarily concerned with ensuring that local services and community facilities are accessible and appropriately supported by infrastructure. Detailed matters relating to electric vehicle provision and charging infrastructure are addressed through the Council's climate change policies.	No change required.
Willingdon Residents' Association • Suggests all community facilities in the district should be retained. • Suggests WDC should encourage ESCC to transfer public facilities to Parish or Town Councils. • Requests consideration of publicly owned medical facilities, shops and sporting facilities, particularly in Willingdon and Polegate.	• Comments noted. • The policy seeks to protect existing local services and community facilities where there is clear evidence of their value and ongoing need, while also supporting the provision of new and enhanced facilities to meet the needs of existing and future communities. • Matters relating to the ownership, management and transfer of public assets are primarily the responsibility of the relevant asset owner.	No change required.

Parish/Town Councils	WDC Response	Changes made to policy/chapter
Heathfield & Waldron Parish Council • Supportive of draft Policy INF7. • Suggests draft Policy EC8 should apply to all local services and community facilities, including publicly owned services and facilities. • Highlights limited access to medical and dental services in Heathfield. • Notes that the draft Plan says little about Early Years provision, especially childcare for under 2s.	• Comments of support noted. • The Council considers Policies INF7 and EC8 provide an appropriate framework for supporting and safeguarding community facilities and services, with Policy EC8 revised to clarify its scope. • Healthcare and early years infrastructure requirements have been informed by ongoing engagement with providers and the Infrastructure Delivery Plan. • Infrastructure needs will continue to be monitored and addressed as development comes forward.	No change to Policy INF7 required.
Rotherfield Parish Council, Mayfield and Five Ashes Parish Council, Laughton Parish Council and Buxted Parish Council • Supportive of draft Policy INF7.	• Comments of support noted.	No change required.
Horam Parish Council • Disagrees with draft Policy INF7. • Suggests draft Policy EC8 must apply to all local services and community facilities, including publicly owned facilities. • Considers Parish Councils should be involved in decisions and alternative business, economic or tourism uses should be explored. • Raises concern that decisions on publicly owned property should not be left to	• Comment of objection noted. • Policies INF7 and EC8 provide a framework for safeguarding community facilities and services, with EC8 clarified to better define its scope. • Loss of a facility will only be supported where robust evidence demonstrates no current or future need and alternative uses have been considered, ensuring decisions are not determined solely by developers or landowners.	No change required.

developers or budget-constrained officers without first seeking alternatives.		
Uckfield Town Council • Supportive of draft Policy INF7. • Suggests draft Policy EC8 should apply to all premises and services benefiting the public, including publicly owned services and facilities. • Requests greater scrutiny of evidence provided by those seeking to dispose of community assets. • Suggests new development should enhance beneficial infrastructure. • Identifies potential to reuse existing health sites in Uckfield, including the ambulance station at Uckfield Hospital.	• Comments of support noted. • Policies INF7 and EC8 provide a framework for supporting and safeguarding community facilities and services. • Policy INF7 requires robust evidence before the loss of a facility can be supported, including demonstrating no current or future need, consideration of alternative uses, and compliance with viability and marketing requirements where relevant. • The policy supports new, enhanced, and replacement facilities, with infrastructure improvements secured through planning obligations where necessary. • The suitability of individual sites for alternative uses will be assessed through the development management process against Local Plan policies and evidence of local needs.	No change required.
Pevensey Parish Council • Disagrees with draft Policy INF7. • Suggests the policy should apply to all services and facilities, including public community facilities. • Suggests paragraph 9.84 should recognise village hotels as community facilities. • Considers point 5 on retention of existing community facilities to be muddled and difficult to apply.	• Policies INF7 and EC8 provide a framework for supporting and safeguarding community facilities and services, including publicly owned facilities. • The Council recognises that some village hotels can perform important community functions, depending on their role and use. • The Policy has been revised to require robust evidence before the loss of a facility can be supported, including consideration of	Policy wording has been amended. strengthened for clarity and consistency.

• Proposes more specific requirements for assessing need, viability, marketing and alternative provision. • Suggests amendments to points 7, 8 and 9 of the policy.	community need, viability, marketing, alternative uses, and replacement provision. • The policy has also been amended to strengthen protection for facilities and features essential to their operation and viability.	
Polegate Town Council • Suggests draft Policy EC8 should apply to all local services and community facilities, including publicly owned facilities. • Supports point 8 of the draft policy. • Raises concern over loss of amenities that are difficult to replace, such as libraries. • Suggests S106 funding should support local services where present in the town. • Suggests development on public amenity car parking should be refused. • Raises concern over planned infrastructure not being delivered in north Polegate.	• Policies INF7 and EC8 provide a framework for supporting and safeguarding community facilities regardless of ownership. • Policy INF7 requires robust evidence before the loss of a facility can be supported, including consideration of need, viability, alternative uses, and replacement provision where appropriate. • The policy supports new and improved facilities, with infrastructure contributions secured where justified. • Features essential to the operation of community facilities, including car parks, are also protected. • Infrastructure delivery in North Polegate has been considered through the Infrastructure Delivery Plan and engagement with providers and will continue to be monitored as development comes forward.	No specific change required.
Willingdon and Jevington Parish Council • Raises concerns over lack of, and access to, medical and sports facilities. • Suggests WDC should use CIL funding to provide sports facilities in Willingdon. • Suggests there should be no more building on agricultural land and farmland.	• The concerns regarding access to healthcare and sports facilities are noted. These matters are addressed through the Council's wider infrastructure planning work. • Funding decisions are considered through the Council's established infrastructure prioritisation and governance processes and relevant site-specific requirements.	No change required.

	• The approach to development on agricultural land is addressed elsewhere in the Local Plan.	
Westham Parish Council • Suggests cumulative need for new community facilities should be considered where clusters of development would over-burden existing facilities. • Suggests land/space should be retained on development sites for facilities including allotments, community spaces, parish offices and early years childcare.	• Comments noted. The cumulative impact of development on community facilities and services has been assessed through the Infrastructure Delivery Plan, supporting evidence, and engagement with service providers. • Where necessary, new provision, enhancements, or developer contributions will be secured to ensure infrastructure keeps pace with growth. • Policy INF7 supports the provision of new and enhanced facilities where needed, with requirements informed by the scale of development and evidence of local need.	No change required.
Hellingly Parish Council • Raises concern over how infrastructure will cope with 15,000 homes without more GP surgeries, schools and hospitals.	• Infrastructure requirements have been considered through the evidence base, including the Infrastructure Delivery Plan, and ongoing engagement with relevant service providers.	No change required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Local Residents – summary of main points • **Principle of policy:** Many residents supported draft Policy INF7; a smaller number objected or raised concerns. • **Scope of Policy EC8:** Several residents suggested Policy EC8 should apply to all local services and community facilities, including	• **Principle of policy:** Support for draft Policy INF7 is welcomed and noted. Objections and concerns raised have also been considered as part of the policy review process. • **Scope of Policy EC8:** The policy provides an appropriate framework for protecting valued community facilities, and opportunities to clarify its scope has been considered as part of the policy review.	No further changes to the Policy required.

publicly owned schools, libraries and medical facilities as well as commercial services. • **Community involvement:** Residents sought stronger requirements to explore alternatives, involve communities and communicate disposal or change processes effectively. • **Infrastructure and facilities:** Concerns were raised about availability of local services, healthcare, libraries, parking, community facilities, green/blue spaces and infrastructure to support large developments. • **Policy wording:** Residents suggested clearer wording on replacement community facilities, public transport access, proof of need before loss, and stronger wording where policy language is considered weak. • **Other concerns:** Some comments raised wider issues including impacts on small communities, farmland, natural habitat, traffic, obesity and fast-food outlets near schools.	• **Community involvement:** The supporting text has also been strengthened to promote collaborative working between developers, service providers, local communities and other stakeholders to help ensure community needs are understood and taken into account when considering the future of local services and community facilities. • **Infrastructure and facilities:** The need to ensure that development is supported by appropriate infrastructure is addressed through the Local Plan, supporting infrastructure policies and the IDP. • **Policy wording:** The policy and supporting text has been reviewed. • **Other concerns:** Comments relating to broader issues, where relevant, are addressed through other policies within the Local Plan rather than through Policy INF7.	
Other Comments	**WDC Response**	
• No comments were recorded in this category.	n/a	n/a

Policy INF8: Open Space, Sports and Recreation Provision

Wealden Local Plan – Regulation 18 Consultation

Total: 89	Support: 22	Neutral: 15	Object: 52

Policy INF8: Open space, sports and recreation provisions		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Clear link between Policy INF8 and multifunctional Green Infrastructure provision should be recognised. • Natural England's Green Infrastructure standards should be incorporated. • Policy should refer to guidance including Make Space for Girls and Homes England guidance on inclusive spaces. • Facilities should meet needs and provide accessible, equitable and safe spaces for all population groups. • Support given for consultation requirements in criterion 16.	• Comments noted and welcomed. • Policy INF8 has been strengthened to recognise the multifunctional benefits of green infrastructure for recreation, health, biodiversity, climate resilience, and connectivity. • The policy and supporting text now reference guidance on creating safe, accessible, and inclusive spaces. • The policy promotes equitable access to open space, sport, and recreation for all community groups. • Consultation requirements have been moved to the supporting text.	Policy wording amended
Sport England • Supportive of draft Policy INF8 and welcomed its comprehensiveness. • Requests amendment for clarity.	• Comment of support noted. Revised wording to the policy.	Amended policy wording.

East Sussex County Council • Supportive of draft Policy INF8. • Recommends expanding criteria and supporting text on safe, accessible and inclusive facilities. • Suggests regard should be had to Safer Parks guidance and Inclusive Spaces and Places for Girls and Young People.	• The Council supports safe, accessible, and inclusive open space, sport, and recreation provision that meets the needs of all users. • Policy INF8 has been strengthened to reflect guidance on creating safe and inclusive spaces for women, girls, and young people. • A new criterion requires open space, sport, and recreation provision to be safe, inclusive, accessible, and well-connected.	Amended policy wording.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
• No comments.	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**

Developers and land agents **Fernham Homes Limited, James Fermor, Stonebond Properties (Sevenoaks) Limited, Fernham Homes (Sussex) Limited, Bellway Strategic, Hempstead Farm Limited, Obsidian Strategic Asset Management and Tarn (Mornings Mill) Limited (DHA Planning Limited)** • Notes that residential developments of 10 or more dwellings are required to contribute to sports, open space and recreation provision. • Suggests the policy should be viability tested to ensure obligations do not threaten delivery of allocated sites.	• Policy INF8 has been informed by the Council's whole-plan viability assessment, which considers the cumulative effect of Local Plan policy requirements on development viability. The Council is satisfied that the policy strikes an appropriate balance between securing necessary infrastructure and maintaining the deliverability of allocated sites.	No change required.
Hertfordshire Holdings (Tor & Co) • Requests clarity on the respective roles of CIL and section 106 agreements. • Suggests the policy should be simplified and made more user friendly. • Suggests detailed submission requirements could be set out in a validation checklist or separate guidance document. • Supports off-site provision where local proposals exist to enhance sports and recreation provision.	• CIL supports the delivery of strategic infrastructure, while Section 106 agreements secure site-specific mitigation and infrastructure. • Policy INF8 has been revised to improve clarity and implementation. • Validation requirements are addressed through the Council's planning application procedures. • The policy supports off-site open space provision where justified, with contributions secured through Section 106 obligations where appropriate.	No change required.
Savills	• Comment noted. Opportunities for site-specific enhancement or provision has been considered through relevant site	No policy change required.

• Suggests the Council should explore opportunities for enhancement/provision including land at Walsh Manor, Crowborough.	assessment and infrastructure planning processes and will be considered as part of the development management process.	
<u>Organisations with specific interests</u> **Village Concerns** • Objects to draft Policy INF8. • Raises concern that East Hoathly with Halland Memorial Sports Ground and associated facilities are not included in the Playing Pitch and Outdoor Sports Strategy. • Raises concerns about maintenance and inspection of children's play areas in new development. • Suggests councils should be compelled to adopt and maintain installed play areas where provided to meet policy requirements.	• The objection to Policy INF8 is noted. • The Policy supports the protection, enhancement and provision of sport and recreation facilities based on the Council's evidence base. • The Policy requires that open space and play facilities provided through development are supported by appropriate long-term management and maintenance arrangements. These can be secured through planning obligations, conditions, management companies or adoption agreements as appropriate.	No change required.
Clarity Ecoworks • Supportive of draft Policy INF8.	• Comment of support noted.	No action required.
Green Transition Crowborough • Objected to draft Policy INF8. • Considers some elements commendable, including the principle that development should meet needs generated and support for multi-use indoor sports/community buildings. • Suggests the chapter misses opportunities to link sports and physical activity with wider plan objectives.	• The Council notes the objection but considers Policy INF8 provides an appropriate framework for sport, recreation, and community facilities. • Support for meeting needs arising from growth and for multi-use sport and community facilities is welcomed. • The policy promotes accessible and sustainable sport and recreation	The policy and supporting text have been amended.

• Suggests the role of sport and physical activity in the modern economy, society and environmental objectives should be better reflected.	provision, supporting healthy, active communities and wider wellbeing objectives.	
<u>Residents Associations</u> **Dicker Residents' Association** • Supportive of draft Policy INF8.	• Comment of support noted.	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Horam Parish Council • Objects to draft Policy INF8. • Requests stronger requirements for local involvement with parish/town councils, user groups and community groups. • Suggests criterion 16 should remove "where relevant" and require consultation with parish/town councils and local communities. • Considers the policy focuses too heavily on sports/active recreation and insufficiently on traditional parks.	• The Council notes the objection but considers Policy INF8 provides an appropriate framework for safeguarding and enhancing sport, recreation, and open space provision. • The policy supports collaborative working with parish and town councils, community organisations, and other stakeholders. • Supporting text has been strengthened to clarify consultation expectations and require proportionate community engagement. • Wider functions of green infrastructure, open space, and environmental quality are addressed through the broader Local Plan policy framework.	• Policy wording amended.
Uckfield Town Council	• Support for Policy INF8 is welcomed.	No policy changes required.

• Supportive of draft Policy INF8. • Raises concerns that population growth will increase pressure on sports facilities. • Identifies shortages in pitches for football, rugby, cricket and stoolball, and absence of an all-weather athletics track. • Suggests growth will place pressure on swimming pools, indoor facilities, cycle paths and accessible footpaths. • Recommends investigating a suitable site for a 400m athletics track, and ancillary facilities.	• Residential developments of 10 or more dwellings must provide or contribute to open space, sport, and recreation facilities where justified by identified need. • The policy supports the protection, enhancement, and provision of sports facilities, including indoor sports, informed by the Council's evidence base. • Walking and cycling infrastructure is addressed elsewhere in the Local Plan. • New sports provision, including future athletics facilities, will be supported where it meets identified needs and aligns with the development plan.	
Laughton Parish Council, Rotherfield Parish Council and Willingdon and Jevington Parish Council • Supportive of draft Policy INF8.	• Comment of support noted.	No action required.
Mayfield and Five Ashes Parish Council • Supportive of draft Policy INF8 and strongly supported its implementation. • Queries consistency with the recent position regarding Uckfield Leisure Centre.	• Comment of support noted. • The issue raised regarding Uckfield Leisure Centre is noted but is not considered to require a change to Policy INF8.	No action required.
Polegate Town Council • Supportive of draft Policy INF8.	• Comment of support noted. • The Council recognises the importance of ensuring that these	No policy changes required.

• Raises concerns over access and maintenance of open spaces and recreational facilities in areas such as Polegate.	facilities remain accessible, well-managed and fit for purpose.	
Westham Parish Council • Objects to draft Policy INF8. • Suggests development on existing outdoor recreation or sports space should be refused in principle. • Suggests parish councils should be able to refuse transferred responsibilities, and long-term costs should be considered.	• Comment of objection is noted. • Policy INF8 provides strong protection for open space, sport, and recreation facilities, permitting their loss only where policy tests are met, including replacement provision or clear alternative benefits. • Appropriate management and maintenance arrangements must be secured through planning conditions or Section 106 agreements. • The Council agrees that adoption or transfer arrangements should only proceed with the receiving body's agreement and that long-term maintenance costs must be properly addressed.	No policy changes required.
East Hoathly with Halland Parish Council • Highlights deficits in open space, sports and recreation facilities, including youth facilities and multi-functional green space. • Raises concern that further housing would worsen the quality and quantity of greenspaces. • Suggests the policy should refer to and support Local Green Space designations through Neighbourhood Plans.	• Policy INF8 protects and enhances open space, sport, and recreation provision, requiring development to contribute to facilities needed as a result of growth. • The policy helps ensure development supports the quality, accessibility, and availability of green spaces for existing and future communities. • The Council recognises the role of Neighbourhood Plans and Local	No policy changes required.

	Green Space designations, which will be taken into account, where adopted they form part of the development plan and relevant in decision-making.	
Hailsham Town Council • Supportive of draft Policy INF8. • Requests reference to Local Green Space designations communities may wish to make through Neighbourhood Plans. • Suggests the policy should express support for Neighbourhood Plans designating sites and clarify how applications will be determined.	• Support for draft Policy INF8 is welcomed and noted. • The Council recognises the role of Neighbourhood Plans and Local Green Space designations, which will be taken into account, where adopted they form part of the development plan and relevant in decision-making.	No policy change/s required.
Heathfield & Waldron Parish Council • Objects to draft Policy INF8. • Suggests public toilet facilities should be re-opened/re-established where lost and additional facilities considered. • Suggests consideration should be given to the new indoor swimming pool in Heathfield. • Notes Heathfield is undersupplied with pitches and relies on developer contributions/CIL/S106 funding.	• The Council notes the objection but considers Policy INF8 provides an appropriate framework for sport, recreation, and open space provision. • The policy recognises the importance of accessible community infrastructure and supports investment in new and enhanced sport and recreation facilities. • Needs for facilities, including indoor sports provision and playing pitches, have been identified through the Council's evidence base and infrastructure planning. • Policy INF8 supports new and improved provision, with developer	• No policy change/s required.

	contributions secured where justified to help meet identified needs.	
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Summary of Local Residents' main issues **Support for the policy** • General support was expressed by a number of residents, with no changes requested. **Community engagement** • Concerns were raised that local involvement should be strengthened, including consultation with parish/town councils, user groups and community groups. **Playing Pitch and Outdoor Sports Strategy** • Residents raised concerns about omission of East Hoathly with Halland Memorial Sports Ground and related facilities from the Playing Pitch and Outdoor Sports Strategy. **Children's play areas** • Concerns were raised about maintenance, inspection, adoption and retention of children's play areas provided through new development. **Open space and active recreation** • Some residents considered that the policy should give greater attention to traditional parks, accessible open space, footpaths, bridleways, byways and cycle tracks. **On-site provision thresholds** • Concerns were raised about the threshold for on-site provision, with suggestions that smaller	**Support for the policy** • Support noted. **Community engagement** • Supporting text to Policy INF8 has been amended to strengthen expectations for proportionate engagement. **Playing Pitch and Outdoor Sports Strategy** • The Council's evidence base ensures that relevant provision is appropriately recognised and reflected, where supported by evidence and justified through the strategy. **Children's play areas** • Long-term management, maintenance, and adoption of open spaces and play facilities will be secured through appropriate planning obligations or management arrangements to ensure their ongoing	Policy and supporting text have been updated.

schemes should contribute financially rather than provide facilities on site. **Site-specific issues** • Site-specific concerns were raised about recreation space, bowls provision, loss of open space, antisocial behaviour, and the need for publicly accessible on-site green space in larger developments.	quality, accessibility, and functionality. **Open space and active recreation** • The Local Plan evidence, including the IDP recognises the valuable contribution these assets. **On-site provision thresholds** • The Council considers it important that open space, sport and recreation requirements are delivered in a proportionate manner, with either on-site provision or financial contributions secured where appropriate to meet identified needs. **Site-specific issues** • Such matters will be considered through the planning application process, having regard to the relevant Local Plan policies and site-specific circumstances.	
Other Comments	**WDC Response**	
• No other comments.	n/a	n/a

Design

Policy DE1: Achieving Well Designed and High Quality Places

WDC Response to the Regulation 18 Consultations

Total: 315	Support:49	Neutral:172	Object:94

Policy DE1: Achieving well designed and high quality places.		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Supports a strategic, masterplanning approach for larger sites or clusters of development to maximise opportunities and manage cumulative impacts. • Recommends integrating habitat connectivity, green infrastructure and SuDS to support nature recovery and climate resilience. • Suggests this approach would be particularly beneficial around Pevensey and offers support for collaborative masterplanning.	• Agreed, however the policy does not need to refer to larger sites as sites of 100 dwellings or more are already required to provide a masterplan.	Amendments made to policy and supporting text.
The National Grid • Supports Policy DE1 and high-quality, sustainable design.	• Agreed, however rather than going into detail around utilities the wording will be kept general to refer to development as a whole.	Policy wording updated.

• Recommends a coordinated, masterplanned approach to development that takes account of site constraints, including high-voltage power infrastructure and other utility assets.		
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
ESCC **County Landscape Architect** • Agree with draft Policy DE1: Achieving well designed and high quality places. **Public Health** • Supports Policy DE1 and recognises the importance of high-quality design in promoting health, wellbeing and reducing inequalities. • Recommends stronger support for high-quality contemporary design that responds to local context and community needs. • Suggests requiring developments to follow recognised healthy design principles, including Building for a Healthy Life and Streets for a Healthy Life.	• Welcome the support. • Agreed. • Agreed, however a shortened version of the proposed text will be added to the policy. • Supporting text amended to include reference to Building for a Healthy Life.	No action required. Part 5 of DE1 will focus on health, amenity and accessibility. Part 1 of the policy amended. Supporting text to now state that applicants should have regard to Building for a Healthy Life.
Kent County Council • Agree with draft Policy DE1: Achieving well designed and high quality places. Supports the focus on sustainable transport choices.	• Welcome the support.	No action required.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**

Developers and land agents **Tor and Co (on behalf of Hertfordshire Holdings)** • Supports efficient land use and compact development that prioritises safe, sustainable travel. However, Policies DE1, DE2 and DE3 could be merged into a single, concise policy that references national design guidance (the NPPF, National Design Guide and National Model Design Code) and commits the Council to preparing local design guidance consistent with national policy.	• It is considered that separate policies are required and serve very different purposes. Policy DE1 is the strategic design policy. DE2 sets out the Council's position on Masterplans and Codes. Policy DE3 relates to the public realm. • However, it is agreed that all the policies and supporting text could be shortened and simplified.	All policies and supporting text to be shortened and simplified.
Grassroots Planning (on behalf of South West Strategic Developments), Savills (on behalf of Trafalgar Group Limited) • Agree with draft Policy DE1: Achieving well designed and high quality places.	• Welcome the support.	No action required.
Gladman Developments Limited • Supports high-quality design but cautions against overly prescriptive policies. Design guidance should remain flexible, allowing development to respond to site-specific circumstances and local character, with proposals assessed on a case-by-case basis rather than through a one-size-fits-all approach.	• It is not considered that the design policies are overly prescriptive. Sites are considered on a site by site basis and the policy acknowledges that, but there are certain key tenets of good design that need to be laid out in the policy	No action required.
Persimmon Homes South East	• Agreed that the term beautiful is subjective.	The word beautiful is to be removed from policy DE1.

• Supports the aim of high-quality design but questions the subjective requirement for development to be 'beautiful'. Recommends using the terminology in NPPF Chapter 12 to ensure consistency with national policy.		
Forest Row Local CBS Limited, Sclater Estates Limited • Welcomes Policy DE1 but considers it insufficiently focused on local character and contextual design, including setting, heritage and urban form. Recommends stronger reference to Sussex-specific design, preparation of a Design SPD through public consultation, extension of the High Weald Design Guide, and clearer design standards to reduce formulaic development and improve local distinctiveness.	• Part 3a of Policy DE1 amended and refers to context led design. It does not refer to Sussex design as the vernacular differs across Sussex. The Design Guide and Characterisation Study will go into more detail as to what is the local character. • Agree that the policy should refer to the new Design Guide. • The High Weald Design Guide does extend to land within the setting of the National Landscape, however we cannot extend its use over the whole district.	Policy wording amended. Reference to forthcoming SPD made.
<u>Organisations with specific interest</u> **Sport England** • Agree with draft Policy DE1: Achieving well designed and high quality places. • Suggests that reference could be made in the supporting text to their our Active Design guidanceF.	• Welcome the support. • Agreed	Reference to the guidance added to the supporting text.
High Weald National Landscape • Supports Policy DE1 and stronger recognition of the High Weald Housing Design Guide.	• Policy updated to refer to local design guidance. The policy has been made more concise and easier to	Policy and supporting text updated.

Recommends expanding supporting text, referencing the Guide within the policy, and including settlement pattern, character, and streetscape character as key considerations to reinforce locally distinctive, landscape-led design.	follow. Reference made to landscape, townscape, heritage assets, settlement pattern, important views and natural features	
Clarity Ecoworks • Agree with draft Policy DE1: Achieving well designed and high quality places. • No change required.	• Welcome the support.	No action required.
Ciht • Agree with draft Policy DE1: Achieving well designed and high quality places. • Emphasises the need for skilled, proactive planning officers with sufficient capacity to deliver robust design assessments and work with developers to achieve high-quality, sustainable developments and communities.	• Welcome the support.	No action required.
Greenbank • Supports Policy DE1 but seeks stronger emphasis on Sussex-specific, contextual design, including setting, heritage and urban form. Recommends reference to a publicly consulted Design SPD, extension of the High Weald Design Guide, and clearer design standards to reduce characterless development while allowing innovative, modern architecture where appropriate.	• Welcome the support. • Policy updated to respond to setting, townscape and landscape. Reference made in supporting text to future SPD. • HW Design Guide can only apply in the HWNL or land within its setting.	Policy and supporting text updated.

<u>Resident Associations and Campaign Groups</u> **Dicker Residents' Association** • Agree with draft Policy DE1: Achieving well designed and high quality places.	• Welcome the support.	No action required.
The Working Group Against Over Development, CPRE Sussex • Supports Policy DE1 but seeks a stronger requirement for Sussex-specific, locally distinctive design. Considers contextual design should take precedence over generic references to high quality, and highlights concerns about the prevalence of formulaic, standardised development.	• Policy DE1 sets out that development should respond to local context but does not refer to Sussex design as the vernacular differs across Sussex. • The updated Design Guide and Characterisation Study goes into more detail as to what is the local character and explain context led design.	No action required.
Transport Futures East Sussex • Agree with draft Policy DE1: Achieving well designed and high quality places. • Support the 'movement' principles. Efficient use of land would be aided by high density, high quality housing developments.	• Welcome the support. • Agreed that part 2 of the policy could be more specific.	Policy wording updated
Willingdon Residents' Association • All building in local areas should be sympathetic to the present design and style of buildings in a particular area.	• Agreed. This is already outlined in part 3 of the policy.	No action required.
Village Concerns	• Policy DE2 will reiterate the need for public engagement when design	Policy wording updated.

• Objects to Policy DE1 on the grounds that communities are consulted too late in the design process. Calls for stronger requirements for early and meaningful community involvement, with greater influence over development proposals and design outcomes to avoid repeating past design failures.	codes and masterplans are being prepared. • The principle of development will be assessed at the application stage and is largely based on the Statutory Development Plan, which will include the Local Plan once adopted. • The views of the local community are important to the Council, however they are one consideration amongst many when determining an application.	
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Heathfield and Waldron Parish Council • Supports Policy DE1 but seeks stronger emphasis on high-quality streetscapes, including hard and soft landscaping. Also calls for greater emphasis on the importance of pre-application engagement with the Council to achieve better design outcomes.	• Welcome the support. • The supporting text highlights the importance of pre application advice.	Policy wording and supporting text updated.
Horam Parish Council • Objects to Policy DE1, citing concerns that the Wealden Design Guide has not been updated to reflect current national policy. Seeks greater weight for neighbourhood plan design guides and codes, and stronger requirements for early community, parish and town council engagement in the design process.	• An updated Wealden Design Guide and Characterisation Study are being prepared to support Regulation 19 Plan. • The Wealden Design guide, once adopted, will be the strategic level guide and would take precedence where it conflicts with neighbourhood-level guidance, as the later-adopted document. This	Policy updated to refer to proprtionate community engagement, depending on scale, nature of sensivity of the proposal.

	approach is consistent with paragraph 31 of the NPPF (December 2024). • It is disportionate to expect community engagement on every application.	
Isfield Parish Council • Supports the policy's direction but seeks a stronger focus on Sussex-specific, locally distinctive design rather than generic quality standards, citing concerns over the prevalence of formulaic development.	• Part 3 of Policy DE1 sets out that development should respond to local context.	No action required.
Mayfield and Five Ashes Parish Council • We strongly agree with Policy DE1. It is vital that this is rigorously enforced once it is adopted.	• Welcome the support.	No action required.
Polegate Town Council • Agree with draft Policy DE1: Achieving well designed and high quality places. • All properties should be of an acceptable quality and meet modern building regulations and possibly beyond.	• Welcome the support. • Agree that developments need to meet Building Regulations but no need to state this in the policy.	No action required.
Uckfield Town Council • Agree with draft Policy DE1: Achieving well Supports Policy DE1 and recognises that design quality is subjective. Supports measures to encourage SME housebuilders, self-build and custom-build housing, while	• Welcome the support. • Policy SS7 already indirectly supports small and medium sized builders. Policy HO4 also supports small and medium sized housebuilders and the delivery of small and custom build homes.	No action required.

emphasising that development should reflect local character and setting. Also notes that references to flint in the Low Weald should be reviewed for accuracy.	There is no need to reiterate this in policy DE1. • The soil may be clay but there is flint used in the Low Weald, for example in the areas bordering the South Downs.	
Hailsham Town Council • Objects to Policy DE1, arguing that references to local character and distinctiveness lack clarity without a district-wide Design Code. Recommends a Design Code to define local design expectations, provide consistency across developments, and guide both planning decisions and neighbourhood-level design guidance.	• Updated district wide Design Guide and Characterisation Study have been prepared which will look in detail at local character.	No action required.
Willingdon and Jevington Parish Council • Supports development that reflects local character and existing building styles, expressing concern that some recent estates have not achieved this. Opposes taller development on narrow roads and favours lower-density forms, such as bungalow developments with open-plan layouts.	• Noted. The Design Guide currently being prepared will set out how context appraisals need to be carried out and what they should contain.	No action required.
Maresfield Parish Council, Frant Parish Council • Supports Policy DE1 but objects to the use of the term 'beautiful' as subjective and potentially contentious. Advocates a stronger	• Welcome the support. • The word beautiful to be removed from policy DE1.	Policy and supporting text updated

focus on Sussex-specific design, compliance with local design guidance and the High Weald Design Guide, protection of neighbouring amenity, and ensuring building heights respond appropriately to street width.	• Policy DE1 sets out that development should respond to local context. It does not refer to Sussex design as the vernacular differs across Sussex. Also refers to guidance to be followed. • Neighbouring amenity is referred to in other parts of the plan. • The scale of buildings will be included in the updated Design Guide.	
East Hoathly with Halland Parish Council • Supports Policy DE1 but seeks stronger recognition of neighbourhood plans, local vernacular design and district character. Calls for a district-wide Design Code to define local design expectations and reduce generic development, while emphasising that housing quality and sustainability should take precedence over developer profit margins.	• Welcome the support. • We do take into account neighbourhood plan policies and local design guides. Wording added to the policy. • Part of the reason for this policy and the Design Guide is to ensure that developers are clear about the design standards we expect from the outset.	Policy wording updated.
Chiddingly Parish Council • Supports Policy DE1 but seeks stronger emphasis on locally distinctive design that reflects the character of the district, rather than urban styles unsuited to rural areas. Cites the Willets Field development at Muddles Green as a positive example of sensitive design and advocates making solar PV installations a standard requirement.	• Welcome the support. • Noted. The Design Guide and Characterisation Study will help to define local character. • We cannot require solar panels on every new dwelling. There may be other forms of renewable energy that are more appropriate or some areas may be sensitive to their positioning.	No action required.

Rotherfield Parish Council • Agree with draft Policy DE1: Achieving well designed and high quality places.	• Welcome the support.	No action required.
Laughton Parish Council • Agree with draft Policy DE1: Achieving well designed and high quality places and particularly references about early, pro-active engagement with community.	• Welcome the support.	No action required.
Arlington Parish Council • Supports Policy DE1 and the principles of high-quality, context-sensitive design. Supports contemporary architecture where it responds to local character and vernacular, promotes appropriate landscaping and boundary treatments, including native hedgerows, and advocates prioritising previously developed land for new development.	• Welcome the support.	No action required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
The word 'beautiful' • Change is required: Avoid the word beautiful. It is far too subjective.	• Agreed that the word beautiful is subjective.	he word beautiful to be removed from policy DE1.
High Weald Design Guide	• Agreed that policy HE1 part 2 needs to be more specific.	Policy wording amended.

• The Policy should refer explicitly to SPD Design Guidance – in the short term the use of the High Weald Design Guide could be extended across all areas of the District outside development boundaries. • immediate consideration should be given to extending the existing High Weald Design Guide to all areas outside development boundaries.	• The High Weald Housing Design Guide would only apply to the High Weald National Landscape and its setting. Wealden Design Guide SPD now referenced.	
Conservation Areas • Reference should be made explicitly in DE1 to Designated Conservation Areas. • Considers that insufficient weight is given to existing housing and its setting within and around the district's conservation areas.	• Policy already refers to heritage assets and there is a separate policy on Conservation Areas.	No action required.
Context and Identity • Considers Policy DE1 insufficiently specific on contextual design, including setting, heritage and layout. Calls for stronger safeguards against incongruous or overly dense development and greater emphasis on ensuring new housing respects local character, landscape and community identity.	• The updated Design Guide will provide further guidance on landscape, historic landscapes and setting. • A district-wide density standard would be inappropriate, as suitable densities vary by site and location; this will be addressed in more detail through the Design Guide.	No action required.
Distinctive Sussex Design • Considers Policy DE1 insufficiently focused on Sussex-specific and locally distinctive design. Calls for clearer, detailed design standards that reflect local character, heritage and settlement patterns, arguing that stronger requirements	• Part 3a of the policy does already state that development will be supported where it responds to local context. • The policy does not refer to Sussex design as the vernacular differs across Sussex.	No action required.

are needed to prevent generic, unsympathetic development and encourage greater respect for traditional architectural features and local context.	• The Design Guide and Characterisation Study will cover local character and explain context led design.	
Lack of Variety and Character • Considers that too much recent development has relied on formulaic, characterless housebuilder designs. Calls for more imaginative, locally distinctive layouts and architecture that reflect Sussex's historic character, with stronger measures to promote variety and prevent generic 'pattern book' development.	• Policy DE1 already states that development needs to respond positively to the character, setting and distinctiveness. • The Design Guide being prepared will include guidelines to secure locally distinctive design. • The Characterisation Study and Design Guide will cover character of different parts of the district.	No action required.
Outline Approval • Calls for much greater scrutiny and control of design at outline planning stage, arguing that design quality is often weakened later through viability arguments and changes in developer ownership.	• Detailed design is not always considered at outline stage, for example all matters may be reserved, therefore they will not have to provide detailed drawings. The types of application that are available are determined by Government.	No action required.
Need for Flexibility • Questions the subjective nature of design quality and notes that achieving net zero may influence building materials and design choices. Calls for greater flexibility in applying design standards, recognising the variety of existing housing styles and the challenges of defining a single local design approach.	• Design is subjective but there are certain tenets of good design that are universal. The updated design guide being prepared will set out guidelines for good design. • The policy is flexible and sets out what will be supported without being overly restrictive.	No action required.

Design Quality and Affordability • Considers that too much new housing is formulaic and lacks local character. Argues that stronger design requirements would improve development quality without increasing house prices, as expectations would be reflected in land values, and that high-quality, locally distinctive design should take precedence over developer viability arguments and profit margins.	• This policy will make clear early on the standards that we expect to see in developments.	No action required.
Innovative and Contemporary Architecture • Supports innovation, sustainable construction and durable building design that contribute to a distinctive contemporary vernacular. Considers the policy lacks ambition in promoting modern, low-carbon design and materials, while also highlighting the importance of ensuring new development respects local character and appearance.	• This policy already supports innovative and contemporary architecture, subject to certain criteria. • There is a separate policy on sustainable design and construction which this policy does not need to repeat.	No action required.
Sustainable Design and Renewable Energy • Calls for stronger environmental design standards, including Passivhaus performance, low embodied carbon and breathable materials. Seeks requirements for renewable energy, water reuse, rainwater management and heat exchange systems to be integrated into new developments, with greater	• Policy CC3 already outlines our policy on sustainable design and construction and reducing use of energy intensive materials.It does not need to repeat this. • Policy CC1 encourages the use of solar PV and battery storage.	No action required.

consistency in applying these measures across both large and small schemes.		
Wildlife • Supports incorporating biodiversity into the design of new development, including features such as swift bricks, swallow and house martin nesting sites, and bat roosting opportunities. Emphasises the need for sustainable design measures to help offset habitat loss and protect wildlife affected by development.	• The Natural Environment Chapter includes many measures to try and protect wildlife and biodiversity. No need to repeat in this chapter.	No action required.
Water • Calls for housing design to place greater emphasis on sustainable water and energy management, including rainwater harvesting and reuse for gardens and toilets. Highlights concerns that large-scale development could worsen pressures on water infrastructure and increase environmental impacts.	• Policy CC3 requires the implementation of measures to reduce water consumption and increase water recycling. No need to repeat in this policy.	No action required.
Settlement Gaps • Seeks a dedicated Settlement Gaps policy to prevent the coalescence of villages and smaller settlements, safeguarding their separate identities and distinct character.	• Policy SS1 sets out the includes the use of development boundaries rather than settlement gaps. • Policy DE1 already reiterates the need for development to contribute to the character of the surrounding built environment but this has been clarified.	See revised policy wording.
Building on Countryside	• Bbrownfield land is prioritised where possible. However, there is a high housing need and given the low	No action required.

• Raises concerns about the scale of development around Uckfield and the loss of countryside. Emphasises the importance of protecting rural land for food production, tree planting and green spaces for the benefit of current and future generations.	availability of brownfield land in the district there will need to be development taking place on greenfield sites.	
Public Consultation • Considers that community engagement occurs too late in the planning and design process, limiting public influence over development proposals. Calls for stronger requirements for early and meaningful community involvement, including a mandatory Statement of Community Involvement within the policy.	• Policy DE2 will reiterate the need for public engagement when design codes and masterplans are being prepared. • The views of the local community are of course important to the Council, however they are one consideration amongst many when determining an application. • The validation criteria sets out when documents are required. No need to repeat this is the policy.	See revised policy wording.
Pre application Advice • Emphasis on pre-application dialogue and communication very important.	• Welcome the support.	No action required.
Lack of a Design Guide or Code • Raises concerns that the Wealden Design Guide has not been updated to reflect current national policy, undermining confidence in the plan's design provisions. Calls for an updated Design Guide or SPD, stronger reference to design guidance prepared through public	• An updated Design Guide and Characterisation Study are currently being prepared. Parish and Town Councils will be involved in its preparation. • The Wealden Design Guide is referred in Policy DE1.	No action required.

consultation, greater prominence for local design standards, and the use of pattern books and collaborative design approaches to promote locally distinctive development and community involvement.		
Neighbourhood Plans • Supports stronger recognition of neighbourhood plan design guides and codes, proposing that they take precedence over district-wide guidance where relevant. Also seeks mandatory early engagement with local communities, parish and town councils as part of the design process.	• The Wealden Design Guide will bea district-wide strategic design guide and, where conflicts arise, would take precedence over neighbourhood-level guidance in accordance with the NPPF. • Community engagement requirements should be proportionate and not apply to all applications, such as minor householder proposals.	No action required.
Enforcement • Seeks stronger measures to ensure approved design quality is delivered in practice, expressing concern that developers often dilute locally distinctive designs during construction. Calls for developments to reflect local character and for enforcement action where approved design standards are not met.	• Enforcement action is only appropriate where development is not built in accordance with approved plans. • The emerging Design Guide and Characterisation Study will provide further guidance on local character and how high-quality design can be achieved.	No action required.
Wording of Policy (not covered elsewhere). • The policy is insufficiently ambitious. Recommends incorporating the full range of contextual design principles from Policy HE1, including setting, heritage, layout, public	• The Design Guide being prepared will provide further detail on many of these points. No need to repeat in policy DE1.	No action required.

realm, landscaping, scale, materials and architectural detailing, to strengthen locally distinctive and context-sensitive design.		
Other Comments	**WDC Response**	
Other comments which are not directly related to the policy which have been raised by the general public include the following: **Infrastructure and Number of Houses** • Raises concerns about the scale of development around Uckfield, questioning the need for additional housing given existing pressures on schools, healthcare, roads, water and sewage infrastructure. Also highlights concerns over the loss of countryside, impacts on the rural character and environment of Sussex, and the delivery of housing in locations perceived as less sustainable.	• Wealden is set a housing need figure by the government. Policy SS1 sets out how this is calculated and how we have tried to meet that figure, although it shoudl be noted we are not meeting thie figure, due to a number of constraints. • Our infrastructure policies are set out in the infrastructure chapter and we will also produce an Infrastructure Delivery Plan.	No action required.
Residents' Mental Health • Raises concerns about the impact of large-scale development on residents' wellbeing, countryside and environmental quality. Highlights worries over water supply and pollution, alongside increased traffic, heavy vehicle movements and air quality impacts on local communities.	• The Local Plan contains policies on Water Environment and Water Infrastructure as well as conserving natural resources including water. Policy CC6 sets out water consumption standards. There is no need to repeat these here. • We have carried out transport modelling to ensure our roads can cope with the development in the Plan.	No action required.

Regulated Speed Limits • Regulated speed limits would be great in and around any new housing estate.	• East Sussex County Council is responsible for setting speed limits in Wealden. The police force is responsible for enforcing speed limits.	No action required.
Consultation Response Form • Considers the Regulation 18 consultation response form inaccessible to some residents, particularly those with learning difficulties, limited digital skills or limited English proficiency. Calls for simpler, more inclusive consultation materials to enable wider public participation.	• The consultation process was designed to be as accessible as possible. While the Local Plan's breadth required a detailed response form, alternative methods of responding were available, including printed forms, letters and emails.	No action required.
The Exhibition • Disappointed with the local plan exhibition, lack of detail and contained too many ideals and aspirations.	• The exhibition did contain detail as to what was in the Plan. The display boards were not specific to the particular town or village because we used them in multiple venues but officers were on hand to provide more specific detail if asked. The Local Plan plans ahead for the next 15 years. It contains a vision and objectives and then the policies to help achieve that vision.	No action required.

Policy DE2: Masterplans and Design Codes

Regulation 18 Draft Local Plan Consultation

Total: 83	Support:69	Neutral:7	Object:7

Policy DE2: Masterplans and Design Codes		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Supports the policy and recommends that groups of development sites are planned comprehensively through masterplanning. This would help deliver integrated green infrastructure, habitat connectivity and nature recovery networks, while ensuring development is sensitively located to avoid impacts on protected landscapes and priority habitats.	• Agreed.	Policy DE2 amended as well as the supporting text to refer to the need fro masterplans. and a new part 3 added to read
Network Rail • Agree with Draft Policy DE2: Masterplans and Design Codes. The provision of a masterplan and/or phasing plan as early as possible will help infrastructure providers plan for where any new infrastructure may be accommodated.	• Welcome the support.	No action required.
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**

East Sussex County Council- County Landscape Architect • Supports Policy DE2 and the use of masterplans. Recommends that masterplanning requirements also apply to smaller schemes in sensitive locations and that masterplans are informed by site-specific landscape and visual assessments undertaken at an early stage to shape development design and layout.	• Welcome the support. • Agreed. A clause is to be added to part 1c of Policy DE2. • The policy already states in part 2 that masterplans should include a site context appraisal. The updated Design Guide will go into more detail as to what this should include.	References added to the policy in respect of masterplans and design codes.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Developers and land agents **Tor and Co** • Supports efficient land use and compact development but considers Policies DE1, DE2 and DE3 could be simplified into a single design policy. Also argues that requirements for masterplans and design codes should be determined by site-specific circumstances and complexity rather than fixed development thresholds.	• Welcome the support. • Separate policies are justified as they address different issues, although the policies and supporting text could be simplified. • We will retain masterplan and design code thresholds for consistency, while allowing flexibility to require masterplans on a case-by-case basis where appropriate.	Policies and supporting text to be shortened and simplified.
Grassroots Planning (on behalf of South West Strategic Developments) • Agree with Draft Policy DE2: Masterplans and Design Codes.	• Welcome the support.	No action required.
Taylor Wimpey UK Ltd	• Policy DE2 does not require Design Codes for developments of fewer	Policy and supporting wording text modified.

• Objects to Policy DE2, arguing that Design Codes should only be required for larger or phased developments and not for full applications where detailed designs are already provided. Also questions the effectiveness of requiring prior agreement of masterplans and design codes, citing the lack of a formal approval process and potential delays to development proposals.	than 500 homes (except self-build/custom-build schemes). • Design Codes remain valuable for large sites, including full applications, in ensuring consistent, high-quality design. • While pre-application discussions cannot guarantee approval, they help identify issues early and can save time and costs during the application process.	
Wates Development • Supports the Council's ambition for high-quality design but questions the blanket requirement for masterplans on schemes over 100 dwellings. Considers existing design and access statement requirements may already address these issues, and argues that requiring masterplans at outline stage could add complexity, reduce flexibility for future developers, and conflict with efforts to streamline the planning process.	• Welcome the support. • Masterplans will allow a greater level of detail than design and access statements alone. Masterplans can and should be produced at the outline stage. This is confirmed in the PPG Paragraph: 007 Reference ID: 26-007-20191001	Policy wording updated.
Landspeed • Agree with Draft Policy DE2: Masterplans and Design Codes.	• Welcome the support.	No action required.
Organisations with specific interest	• Welcome the support.	No action required.

CIHT • Agree with Draft Policy DE2: Masterplans and Design Codes but design codes should be required on schemes of over 250 homes and masterplans on schemes of 50 homes.	• There is a balance to be had between the expense of requiring these documents which it consider appropriate at 500 for design codes and 100 for masterplans.	
Swifts Local Network: Swifts & Planning Group • Suggests including biodiversity features within Design Codes, such as swift bricks, house martin nest cups and other wildlife nesting opportunities, in accordance with best-practice guidance, with evidence of installation provided where required.	• This is now a consideration in the Natural Environment Chapter. No need to repeat here.	No action required.
Resident Associations and Campaign Groups **Village Concerns** • Considers community consultation on major developments is often too late and provides limited influence over key decisions, leading to distrust. Calls for earlier engagement with local communities and neighbourhood plan groups, greater emphasis on public transport accessibility, and masterplanning of multiple related developments where their combined scale exceeds 100 homes.	• Agree that the policy could make the importance of public engagement clearer. • Consultation on the Local Plan takes place in line with the Councils SCI. Any pre application meetings held with Planning Officers are confidential at least until an application is submitted, see our website here. • Sites in the same village often come forward separately under different ownership and at different times. There may also be some distance between them. However the benefits of an overall masterplan for adjoining sites are noted.	Policy wording amended and additional supporting text to re iterate the importance of public engagement in the preparation of masterplans and design codes, including in realtion to adjoining sites.

The Working Group Against Over Development, CPRE Sussex • Supports Policy DE2 in principle but recommends lowering the masterplan threshold to 50 dwellings in villages and requiring masterplans for all non-minor development within the National Landscape, reflecting the greater sensitivity of these locations.	• Welcome the support • There is a balance to be had between the benefits they bring and the cost of producing them which we believe is fair at 100 dwellings, regardless of whether in a town or village. • The policy already has a clause that states masterplans can be required where there are specific complexities or sensitivities.	No action required.
Dicker Residents Association • Agree with Draft Policy DE2: Masterplans and Design Codes.	• Welcome the support.	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Rotherfield Parish Council • Agree with the size of development on which you are requiring the use of Design Codes and Masterplans.	• Welcome the support.	No action required.
Horam Parish Council • Objects to Policy DE2, arguing that stronger design controls are needed through an up-to-date Wealden Design Guide. Recommends lower thresholds for masterplans and design codes, their publication before application submission, greater transparency around pre-application discussions, and earlier access to information to improve public confidence in the planning process.	• The Council has prepared an updated Design Guide and Characterisation Study to accompany the Regulation 19 Local Plan. • While masterplans and design codes impose costs on developers, thresholds seek to balance these costs against the benefits of securing coordinated, high-quality design. Design codes are considered most	No action required.

	valuable on larger, multi-phase sites, and early submission through pre-application discussions can help identify issues and improve efficiency. • Pre-application advice letters will be published following application submission, subject to exemptions for commercially sensitive information.	
Laughton Parish Council • Supports Policy DE2 in principle but considers the requirement for Design Codes on all self-build and custom-build schemes disproportionate. Suggests that smaller schemes should instead demonstrate an overall design coherence and shared vision, rather than requiring a formal Design Code.	• Welcome the support. • Self build and custom build plots will require design codes in order to ensure some continuity between plots.	No action required.
Heathfield and Waldron Parish Council • Agree with Draft Policy DE2: Masterplans and Design Codes, although codes and Masterplans should also be considered for residential developments as well as non-residential development, whatever their size, at the discretion of the LPA, in the context of local circumstances and vernacular.	• Welcome the support. • Masterplans are required for significant residential development over 100 dwellings and where site specific complexities or sensitivities require a masterplan led approach.	• No action required.
Hailsham Town Council • Supports Policy DE2 and the use of masterplans and design codes for strategic	• Welcome the support	Updated policy wording in Policy DE1.

development. However, seeks a district-wide Design Code to define good design and local character, with neighbourhood plans providing more detailed local interpretation and input into the design code process.	• A separate District Design Guide and Characterisation Study is being produced • Reference to neighbourhood plans and associated design guides and codes will be added to policy DE1.	
East Hoathly with Halland Parish Council • Supports Policy DE2 but considers that, without a district-wide Design Code, local character and distinctiveness remain insufficiently defined. Calls for a Design Code that clearly establishes local design expectations and the key qualities of different places to guide planning decisions and development proposals.	• Welcome the support. • The Council is preparing an updated district wide Design Guide and Characterisation Study.	No action required.
Chiddingly Parish Council • Supports appropriate design that reflects the character of the district and local context, noting concerns that some developer-led designs are better suited to urban environments. Also advocates making solar PV installations a standard requirement in new development.	• The district wide Design Guide being prepared should help to improve design across the district. • We cannot require solar panels on every new dwelling. There may be other forms of renewable energy that are more appropriate or some areas may be sensitive to their positioning.	No action required.
Mayfield and Five Ashes Parish Council • Agree with Draft Policy DE2: Masterplans and Design Codes.	• Welcome the support.	No action required.
Uckfield Town Council	• Welcome the support.	No action required.

• Supports Policy DE2 but recommends lowering the Design Code threshold to 200 dwellings, particularly for large schemes near heritage assets. Also seeks stronger design requirements to promote locally distinctive, low-maintenance development and greater variety in housing types and layouts, rather than large-scale repetitive designs.	• It is considered that 500 dwellings is the appropriate threshold for design codes, although they will be encouraged on smaller developments.	
Arlington Parish Council • Supports Policy DE2 and the use of masterplans and design codes for larger developments. Also highlights the value of locally prepared design codes through neighbourhood planning to reflect local character, vernacular materials and community knowledge, ensuring parish councils can play a meaningful role in shaping design outcomes.	• Welcome the support. • Parishes can produce a design guide or code and for it to have any weight would need to be as part of a neighbourhood plan.	No action required.
Polegate Town Council • Supports Policy DE2 and requests that masterplans identify the location of key infrastructure and open space from the outset, with these provisions retained if sites are later subdivided. Also highlights the need for any public toilets provided to include Changing Places facilities.	• Welcome the support. • It is unclear whether this comment relates to the location of services such as gas, water, electricity or amenities such as open space. In either case the Case Officer will assess the site layout when determining the application. • This policy does not refer to public toilets.	No action required.
Frant Parish Council	• Itis not considered that masterplans will be required on anything less than 100 dwellings, other than where	No action required.

• Supports Policy DE2 and recognises the value of masterplanning in delivering coordinated, well-integrated development. However, recommends lowering the threshold for requiring masterplans to 15 dwellings, arguing that this would help avoid piecemeal development and improve integration with surrounding communities.	complexities exist. A balance has to be found between the benefits that they bring and the cost involved in producing them.	
Maresfield Parish Council • Supports Policy DE2 but recommends lowering the masterplan threshold to 15 dwellings, arguing that even relatively small developments can benefit from a holistic approach. Also seeks greater clarity on how collaborative engagement with residents will operate in practice and suggests reinstating neighbour notification letters to improve awareness and participation in planning consultations.	• It is not considered that masterplans will be required on anything less than 100 dwellings, other than where complexities exist. A balance has to be found between the benefits that they bring and the cost involved in producing them. • As regards Design Codes, there is guidance already set out in the National Model Design Code Part 2. • We advertise applications in accordance with the Council's Statement of Community Involvement.	Policy wording updated.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Principle of Policy • The majority of respondents agree with Draft Policy DE2.	• Welcome the support.	No action required.
Pre application Discussions • Seeks stronger transparency in the masterplanning process by requiring	• From June 2025 we publish the pre application advice letter received following the submission of a	No action required.

masterplans and design codes to be prepared and considered before planning applications are submitted. Also calls for publication of pre-application information and correspondence to improve public confidence and accountability in planning decisions.	planning application. There is no need to state this in the policy.	
Wording of the Policy • Recommends explicit reference to the Government's Building Better, Building Beautiful principles and stronger requirements for development to reflect local vernacular architecture. Argues that superficial design references are insufficient and that a genuine understanding and application of local character should be demonstrated throughout all development.	• The 'Living with Beauty' report of the Building Better, Building Beautiful Commission was written in 2020 so is now a few years old. The district-wide Design Guide and Characterisation Study will offer guidance on what local character is and guidelines for achieving good design.	No action required.
Threshold for Requiring Masterplans and Design Codes- Should be Lower • Objects to the proposed thresholds for masterplans and Design Codes, with suggestions ranging from applying them to much smaller developments to requiring design codes for all schemes. Common themes include a desire for stronger design controls, greater transparency and public involvement, and ensuring development reflects local Sussex character rather than generic housing design.	• In response to all comments suggesting lower thresholds for requiring masterplans and design codes, there is a balance to be had between the expense of requiring these documents and the benefits they provide. We believe the balance is fair at 500 for design codes and 100 for masterplans.	No action required.

Threshold for Requiring Masterplans and Design Codes- Should Stop Development Altogether • Objects to the proposed masterplan and Design Code requirements, arguing that further development is unnecessary given population trends.	• The Governments sets the District a Housing Need Figure which we need to try and meet through the Local Plan.	No action required.
Threshold for Requiring Masterplans and Design Codes- Agree with the size of development • Agree with the size of development requiring the use of Design Codes and Masterplans.	• Welcome the support.	No action required.
Absence of up to date District Design Guide/ Code • An up to date Wealden Design Guide is needed.	• The Council is preparing a district wide Design Guide and Characterisation Study.	No action required.
Suggestions for What Design Codes Should Include • Supports stronger Design Codes and Masterplans, with a particular focus on Sussex vernacular design, local materials and distinctive character. Recommends detailed design guidance covering traditional architectural features, conservation areas, housing variety, connectivity and traffic planning, while discouraging generic housebuilder designs.	• Comments on local character, materials, sustainability, connectivity and layout will inform the emerging Design Guide. • While standard housebuilder designs cannot be prohibited, stronger guidance will help raise design quality. • Traffic, layout and cul-de-sac design will also be considered through the Design Guide, alongside normal planning and highway assessments.	No action required.
What Masterplans should include. • Also seeks coordinated masterplanning of related developments and long-term	• Points around masterplans for adjoining sites are noted. • A Management Plan would not usually be required at the masterplan	Policy wording amended.

management strategies for landscaping and public spaces.	stage. These are often required by condition or by S106 agreement.	

Policy D3: Spaces for People, Nature and the Public Realm

Regulation 18 Draft Local Plan Consultation

Total: 83	Support:76	Neutral:4	Object:3

Policy DE3: Spaces for People, Nature and the Public Realm.		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Natural England • Advise that clear reference should be made between this Policy and Green Infrastructure Provision. We refer you to our advice regarding Green Infrastructure.	• Noted. Reference to be made in supporting text to other policies.	Supporting text amended.
Network Rail • Supports Policy DE3 and recommends that it explicitly address railway safety, ensuring that development does not increase risks associated with railway interactions, particularly at level crossings, and that appropriate mitigation is provided where necessary.	• Welcome the support. • Considerations about railways safety are covered generally by other policies in the Plan.	• No action required.

Neighbouring/Other Local Authorities	WDC Response	Changes made to policy/chapter
East Sussex County Council **County Landscape Architect** • Agrees with draft Policy DE3: Spaces for people, nature and the public realm. Transport and Highways • Supports people-focused public realm design that responds to community needs through meaningful engagement. Recommends incorporating Healthy Streets principles, providing accessible seating and resting places, and ensuring public spaces are designed to be inclusive, including for people living with dementia and other vulnerable groups.	• Welcome the support. • Noted. Consultation with communities is critical. The supporting text of policy HE1 makes it clear that applicants should take early, meaningful and proportionate community engagement. • Noted. The need to create public spaces that encourage social interaction is sufficient. • Part 1 refers to creating accessible spaces.	No action required. Amended wording is set out in the Policy and supporting text.
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
<u>Developers and land agents</u> **Tor and Co (on behalf of Hertfordshire Holdings)** • Supports efficient land use and compact development that prioritises sustainable travel. However, suggests Policies DE1, DE2 and DE3 could be simplified into a single design policy that references national design guidance and	• Welcome the support. • Policies DE1, DE2 and DE3 serve very different purposes and it is considered that each policy is required. • However, it is agreed that all the policies and supporting text could be shortened and simplified.	Policies and supporting text have been to be shortened and simplified.

commits the Council to preparing locally specific design guidance aligned with national policy.		
Savills (on behalf of Trafalgar Group Limited), Clarity Ecoworks • Agree with draft Policy DE3: Spaces for people, nature and the public realm.	• Welcome the support.	No action required.
<u>Organisations with specific interest</u> **Conservators of Ashdown Forest** • Suggests clarifying the definition of public space to distinguish areas that are publicly accessible but not designed for universal physical access, such as Ashdown Forest. Also recommends that provision of safe, accessible green spaces explicitly supports the SAMMS programme and the protection of designated sites.	• This policy focuses on the provision of public realm within new development and redevelopment, within and adjoining our towns and villages. It does not include public space such as Ashdown Forest. It is considered that this is self-evident and does not need further explanation in the policy.	No action required.
Sport England • Agree with draft Policy DE3: Spaces for people, nature and the public realm, • This policy aligns closely with Sport England's Active Design Guidance and the checklist provided with the guidance could be used to demonstrate compliance with it.	• Welcome the support. • Active Design Guidance is already referred to in the supporting text of policy DE1.	No action required.

<u>Resident Associations and Campaign Groups</u> **Village Concerns** • Supports Policy DE3 and highlights the importance of protecting dark skies in rural areas. Recommends that lighting proposals reflect community preferences and local character, rather than defaulting to urban street lighting and illuminated estate designs.	• Welcome the support. • Cross reference to policy NE10 which lists criteria to avoid light pollution has been made.	See amended policy text.
The Working Group Against Over Development, CPRE Sussex • Supports Policy DE3 but seeks safeguards against excessive street lighting. Recommends a presumption against artificial lighting unless necessary, with measures such as part-night lighting or motion-activated lighting to protect dark skies while maintaining safety.	• Welcome the support. • Cross reference to policy NE10 which lists criteria to avoid light pollution has been made.	See amended policy text.
Dicker Residents' Association, Willingdon Residents' Association • Agree with draft Policy DE3: Spaces for people, nature and the public realm.	• Welcome the support.	No action required.
Transport Futures East Sussex • Agree with draft Policy DE3: Spaces for people, nature and the public realm. • The principles are fine. Achieving the objectives would be best served by reductions in vehicle use and ownership.	• Welcome the support. • Reference to reduction of car ownership and use is outside the scope of this policy.	No action required.

Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Mayfield and Five Ashes Parish Council • Supports Policy DE3 and recommends that the target for planning applications refused under the policy but allowed on appeal is strengthened from "minimise" to zero, in line with the targets for Policies INF3 and INF4.	• Welcome the support. • This has been considered under the infrastructure responses.	No action required.
Rotherfield Parish Council, Isfield Parish Council, Uckfield Town Council, Willingdon and Jevington Parish Council, Frant Parish Council, Maresfield Parish Council • Agree with draft Policy DE3.	• Welcome the support.	No action required.
Horam Parish Council • Agree with draft Policy DE3: Spaces for people, nature and the public realm. • Horam does not have a traditional park where residents can walk among shrubs and flowers, sit and needs to be rectified.	• Welcome the support. • This is outside the scope of this policy but Policy INF8: Open space, sports and recreation provisions does allow for new or enhanced open space or recreation provision depending on the size of new developments.	No action required.
Polegate Town Council • Agree with draft Policy DE3: Spaces for people, nature and the public realm. • Design and access statements are a must**.**	• Welcome the support. • Design and Access Statements are a requirement on certain applications only.	No action required.
Arlington Parish Council	• Welcome the support.	No action required.

• Agree with draft Policy DE3: Spaces for people, nature and the public realm. • We agree, particularly concerning the use of trees for shade in a future hotter world. Use of deciduous trees should be encouraged.	• Further guidance on street trees are considered in the Design Guide.	
Heathfield and Waldron Parish Council • Supports Policy DE3 but seeks a more integrated approach to the design of public and private spaces. Recommends reducing the distinction between them to create a more cohesive and connected overall design.	• Welcome the support. • There is already a distinction between public and private space.	No action required.
Laughton Parish Council • Agree with draft Policy DE3: Spaces for people, nature and the public realm. • All developments should enhance and contribute to the public realm and nature, including encouragement of edible planting, orchards, raised beds etc	• Welcome the support. • Policy SS10 already has a criteria stating that where appropriate schemes should provide opportunities for growing healthy food, including through allotments.	No action required.
Crowborough Town Council • Green and recreational spaces provided should be adequate and multi-generational spaces.	• Part 1a already states that public spaces should be accessible and inclusive. The amount of open space to be provided on schemes is outlined in policy INF8.	No action required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Principle of Policy • The majority of respondents agree with draft policy HE3.	• Welcome the support.	No action required.

Green Infrastructure Provision • Highlights a lack of accessible public green spaces in some communities, particularly Horam, and calls for more parks and landscaped areas for recreation and social interaction. Also raises concerns about proposed development affecting valued open spaces, public rights of way and ancient woodland.	• Policy INF8 and the associated Table sets out how much open space should be provided on new developments and the type of space, according to the size of the new population. • Each scheme is thoroughly assessed against the constraints that exist on site before being allocated in the Local Plan.	No action required.
Community • Suggests that green space proposals should reflect the needs of the wider community. In relation to a site in Maresfield, any design of open space should consider broader community use and benefits.	• We agree that the needs of the wider community should be considered. The public will be able to comment on any planning application.	No action required.
Healthy Streets • Physical activities, where, who will deliver the funding?	• Policy wording is around providing the public space that encourages physical activity. This would be provided by the developer.	No action required.
Street Furniture • Street furniture and street lights. The furniture will be stolen and we do not need any more street lights adding to the environmental pollution.	• There are ways of ensuring street furniture is secured to the ground. • Reference made to policy NE10 which lists criteria to avoid light pollution.	See revised policy wording.

Lighting • Supports Policy DE3 and the protection of dark skies, highlighting that many rural communities oppose urban-style street lighting. Recommends that lighting proposals reflect local preferences and character, with developers engaging communities before introducing illuminated streets or estates.	• Reference made to policy NE10 which lists criteria to avoid light pollution.	See revised policy wording.
Wording of the Policy • It was suggested that the policy needs to be more realistic.	• It is considered that the policy is realistic and that the design criteria are achievable.	No action required.
Trees and Planting • Trees grow out of control, because the local authority doesn't have the funding to maintain them.	• It is usual that a Management Company would be expected to maintain them.	Policy wording amended.
Natural Beauty/ Features • Focus on fixing the roads and cleaning up litter. • Natural features and public footpaths are slowly being eroded.	• Road repairs are the responsibility of East Sussex County Council and not related to this policy. • The policy aims to protect and incorporate natural features and footpaths in the public realm.	No action required.

Policy D4: Shopfronts

Regulation 18 Draft Local Plan Consultation

Total: 68	Support:67	Neutral:1	Object:0

Policy DE4: Shop Fronts and Advertisements		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
No responses to this policy.	n/a	n/a
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
No responses to this policy.	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Village Concerns, Dicker Residents Association, CPRE Sussex, Willingdon Residents Association, The Working Group Against Overdevelopment, Clarity Ecoworks. • Agree with draft policy DE4.	• Welcome the support.	No action required.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Horam Parish Council, Polegate Town Council, Isfield Parish Council, Willingdon and Jevington Parish Council, Rotherfield Parish Council. • Agree with draft policy DE4.	• Welcome the support.	No action required.
Mayfield and Five Ashes Parish Council	• Welcome the support.	No action required.

• Supports Policy DE4, recognising the importance of maintaining the character of Mayfield High Street. Emphasises that shopfronts and advertisements should be attractive and welcoming while remaining sympathetic to their historic surroundings.		
Uckfield Town Council • Supports applying conservation area shopfront standards to adjoining areas where appropriate, particularly where they contribute to the historic character of town centres. For example, parts of Uckfield High Street outside the current conservation area should be designed to the same standard given their potential future inclusion.	• Welcome the support. • Areas outside the Conservation Area are covered by parts of the policy. Listed Buildings and Non-Designated Heritage Assets across the whole district are also covered.	No action required.
Maresfield Parish Council, Frant Parish Council • Supports Policy DE4 and proposes strengthening heritage-related design requirements. Recommends that new and replacement shopfronts reflect the proportions and detailing of historic shopfronts, that surviving historic blinds are retained, that solid external shutters are strongly resisted, particularly on listed buildings and within conservation areas, and that the policy references dark skies considerations.	• Welcome the support. • This policy and supporting has been significantly shortened and made to be more concise. The amendments cover a number of points raised including, dark skies.	Policy and supporting text amended.
Heathfield and Waldron Parish Council • Agree with draft policy DE4.	• Welcome the support. • Reference to non-designated heritage assets added to part 2.	See amended policy and supporting text.

• Supports Policy DE4 but recommends extending shopfront and advertisement design requirements to Buildings of Local Importance/Significance, alongside Listed Buildings and Conservation Areas, to ensure their character and setting are also protected.	Explanation added to supporting text.	
Arlington Parish Council • Agree with draft policy DE4. • In rural areas signing must be unobtrusive and in keeping with local and historical distinctiveness.	• Welcome the support. • Part 4 of policy DE4 already refers to preserving visual amenity and the need for them to be sensitively designed.	No action required.
Local Residents	**WDC Response**	**Changes made to policy/chapter**
• The majority of local residents who responded to this question agreed with draft policy DE4.	• Welcome the support.	No action required.
• One resident stated all advertisements selling high carbon emissions products and services (e.g. flying, driving etc) should be banned.	• This is outside the control of the Local Plan.	No action required.
• Another resident commented that we might have missed flags outside new developments - unsightly and unnecessary.	• These will usually only be temporary and some may benefit from deemed consent under the regulations. If they need consent, then the policy would apply.	No action required.

Economy

Policy EC1: Sustainable Economic Prosperity and Investment

WDC Response to the Regulation 18 Consultations

Total: 81	Support: 65	Neutral: 6	Object: 10

Policy EC1: Sustainable Economic Prosperity and Investment		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
East Sussex County Council Supportive of the policy The supporting text could be further strengthened by stating how a prosperous local economy contributes to improving mental health and wellbeing and reducing health inequalities for the population.	Support welcomed. The introductory and supporting text of Policy EC1 is centred on the Councils Economic Development Strategy (2023), which focuses on the five key themes set out. Thee Council acknowledges the positive relationship between economic prosperity, employment opportunities, health and wellbeing. However, Policy EC1 is primarily intended to provide a framework for supporting sustainable economic development. Health, wellbeing and the reduction of inequalities are addressed more comprehensively through the wider objectives and policies of the Local Plan. The	Comment noted. No changes required.

	Council therefore considers that additional wording is not necessary.	
Network Rail Supportive of the policy The railway can help to support the local economy and should be a key part of the economic strategy for Wealden.	Support welcomed Policy EC1 (d) requires that major economic development proposals deliver environmental and climate change requirements including 'providing for sustainable modes of travel wherever possible.' This would include travel via rail, as a sustainable mode of transport. These matters have been considered through the wider spatial strategy and economic evidence base. The Local Plan should be read as a whole, and the contribution of transport infrastructure, including the railway network, is addressed through relevant transport, infrastructure and economic development policies.	Comment noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Developers and agents</u> **AM Work Space Limited** Raised an objection to the policy The policy should be amended to set out a commitment to support proposals where this	Objection noted Policy SS5 sets out how employment needs in the district will be met over the Plan period, and Policy SS6 confirms how sites will contribute to meeting this need, alongside site	Comment noted. No changes required.

would contribute to meeting the identified business and employment needs of the district over the Plan period, in line with the NPPF.	specific employment allocation policies. Policies within the Plan should be read as a whole.	
SA Marts Ltd Raised an objection to the policy As currently worded it appears that any employment that delivers low-skilled work would be discouraged/not supported. The wording could simply be changed to add "including" before "growth in high-skilled jobs".	Objection noted The Plan seeks to support all types of employment provision, thus the wording of Policy EC1 will be amended to clarify.	Comments noted and the policy has been amended on this basis.
South West Strategic Development Supportive of the policy Flexibility should be introduced to deal with the challenges of meeting climate change and energy requirements for some employment uses. The Council is not planning for sufficient employment land provision.	Support welcomed The Council acknowledges that some employment uses may face practical and operational challenges in meeting climate change and energy performance requirements. However, Policy EC1 seeks to support sustainable economic growth whilst encouraging development that contributes towards environmental and climate change objectives. The policy is intended to be applied proportionately alongside other Local Plan policies, taking account of the nature of the proposed development and site-specific circumstances. Policy SS5 sets out how employment needs in the district will be met over the Plan period, and Policy SS6	Comment noted. No changes required.

	confirms how sites will contribute to meeting this need, alongside site specific employment allocation policies. Policies within the Plan should be read as a whole.	
Westcott Leach Limited Raised an objection to the policy The policy should be amended to set out a commitment to support proposals where this would contribute to meeting the identified business and employment needs of the district over the Plan period, in line with the NPPF. The current policy is considered too restrictive and will not deliver sufficient employment floorspace to address the identified need.	Objection noted Policy SS5 sets out how the quantum of employment floorspace will be met over the Plan period, and Policy SS6 confirms how sites will contribute to meeting this need, alongside site specific employment allocation policies. Policies within the Plan should be read as a whole. Policy EC2 allow for intensification and redevelopment of strategic employment sites to provide additional and improved floorspace on the strategic sites identified. Policy EC3 seeks to retain non-strategic employment floorspace. Policy EC8 allows change of use only where evidenced. Cumulatively it is considered that these policies provide and retain quantity of floorspace, location and varying quality of it, to meet needs as set out in the Economic and Employment Study Update (2026).	Comment noted. No changes required.
Organisation with specific interest	Objection noted	Comment noted. No change required.

CPRE Sussex Raised an objection to the policy It is not considered that a convincing case has been made for the provision of further employment allocations. The Policy should be amended to include a review of the proposed strategic allocations before 2030.	Policies SS5 and SS6 seek to deliver and allocate land for employment allocation, alongside site specific allocation policies. Policy EC1 seeks to support sustainable economic development across the District, including but not solely on those allocated sites.	
Green Transition Crowborough Raised an objection to the policy There should be greater attention paid to the more dynamic economic developments that can be envisaged over this period, together with their planning implications. The themes of the Plan need to be better integrated and show more foresight.	Objection noted. The Council recognises that economic circumstances, technologies and business sectors may evolve over the plan period and that the Local Plan should provide a sufficiently flexible framework to respond to change. The Plan has been informed by relevant evidence and seeks to balance economic growth, housing delivery, environmental protection and infrastructure provision through an integrated spatial strategy. The Council considers that the policies of the Plan provide an appropriate level of flexibility to accommodate changing economic opportunities while maintaining a clear and deliverable strategy for sustainable development.	Comment noted. No change required.
Uckfield Chamber of Commerce Supportive of the policy	Comment of support noted.	Comment of support noted. No change required.

Support the identification of new sites out of town centres. Would encourage more tourism.		
Resident Association **Dicker Residents Association** Supportive of the policy Tourism is not only based on coastal resorts but also on the many beautiful rural attractions.	Support welcomed.	Comment noted. No change required.
The Working Group Against Over Development Raised an objection to the policy It is not considered that a convincing case has been made for the provision of further employment allocations. The Policy should be amended to include a review of the proposed strategic allocations before 2030.	Objection noted Policies SS5 and SS6 seek to deliver and allocate land for employment allocation, alongside site specific allocation policies. Policy EC1 seeks to support sustainable economic development across the District, including but not solely on those allocated sites.	Comment noted. No change required.
Village Concerns Supportive of draft Policy EC1 Sustainable Economic Prosperity and Investment	Support welcomed	Comment of support noted. No change required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Crowborough Parish Council **Horam Parish Council** **Rotherfield Parish Council** Supportive of the policy	Support welcomed	Comment of support noted. No change required.
Arlington Parish Council Supportive of the policy Tourism is largely based on the rural nature of the District and in order to capitalise on this we	Support welcomed The Council recognises the importance of tourism to the rural economy and acknowledges that the District's countryside, villages and rural	Comment of support noted. No change required.

need to keep villages rural and free of through traffic.	character are key attractions. The Local Plan seeks to support sustainable tourism while protecting the character of rural settlements, the countryside and environmental assets. Traffic impacts associated with development are addressed through transport and infrastructure policies and will be assessed on a case-by-case basis.	
Heathfield & Waldron Parish Council Supportive of the policy On matters related to start up and small businesses the requirements to keep conditions and regulations appropriate/simple are fundamental to such businesses.	Support welcomed The need for planning conditions on any planning consent will be considered at the development management stage. The policies have been written with proportionate requirements in mind and where applicable.	Comment of supported noted. No change required.
Laughton Parish Council Supportive of the policy The policy should have a positive approach to the formation and growth of businesses which operate in the green economy.	Support welcomed The policy seeks to support all sectors and business uses where appropriate and dependant on impact, regardless of end use/occupier.	Comment of support noted. No changes required.
Mayfield and Five Ashes Parish Council No comment on this policy	Comment noted	Comment noted. No change required.
Polegate Parish Council Supportive of the policy More encouragement should be included for businesses to create larger employment	Support welcomed Other Policies within the Economy Chapter, such as EC2 and EC3, seek	Comment noted. No change required.

opportunities. Reduction of business rates would assist.	to enable business expansion where appropriate. The application of business rates is outside of control of the planning system.	
Uckfield Town Council Supportive of the policy More support and encouragement could be provided to start-ups. Youth employment investment and awareness of the impact of artificial intelligence should be identified in the policy. Other areas to consider include: maintaining local and original forms of employment utilising modern technologies welcome and support any development of facilities to support the learning and updating of key skills and trades push for further improvements to WI-FI and mobile phone coverage in the rural areas encourage and support small/medium sized enterprises in High Street through business rate initiatives and incentives, to balance all rates in the town and compensate for the internet expand parking provision in town and village centres to support growth tie up public transport to job opportunities	Support welcomed Policy EC1(b) seeks to specifically support start-up businesses. Policy EC1(a) requires major economic development proposals to demonstrate how it will support local, employment, skills and education. Policy EC1(h) requires digital infrastructure improvements. The application of other measures such as business rate changes and parking provision is outside the control of the planning system.	Comment noted. No change required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
The majority of residents are supportive of the policy with some objecting	The distribution of employment development and the identification	Comment noted. No change required.

Further considerations should be given to the location of strategic employment allocations further south of the A22 at the junction with the A27 and closer to Eastbourne, to align with a revised distribution of strategic housing sites and reduce traffic pressure on the A22. Endeavour to promote development and employment opportunities near the train lines through High Weald to secure sustainable rebalancing of the north south divide Sites on edges of towns and villages should be allocated for employment use. Challenges to SS5 shows that there is no need for additional employment allocations. Future substantial employment provision should be in the south of the district, in line with the ICENI study. The draft policy makes much play of the direction of travel, and refers to the fact that the public asked for (a) or (b). Object to building on farmland. Insufficient focus on the protection of farmland and employment. A separate policy which supports farming, especially environmentally-friendly farming such as organic, and local food production should be introduced. The policy should aim to protect such farming and food production from development. Would expect a statement about supporting employment in the agriculture and forestry sectors of the economy.	of strategic employment sites have been considered through the spatial strategy, employment evidence base and site selection process. Policy EC1 provides a framework to support sustainable economic development across the District, whilst the location of specific employment allocations is addressed elsewhere in the Local Plan. Criterion 1(c) of Policy EC1 specifically supports the growth and diversification of the rural economy, including agricultural, forestry and food production uses, where development is appropriate to its location, scale and design. Protection of the countryside and agricultural land is also addressed through other policies within the Local Plan.	

Policy EC2: Existing Strategic Employment Sites

WDC Response to the Regulation 18 Consultations

Total: 80	Support: 62	Neutral: 13	Object: 5

Policy EC2: Existing Strategic Employment Sites		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
National Highways Intensification of use of existing employment that impact on the SRN should be accompanied by a Transport Assessment and Travel Plan.	The Council acknowledges the importance of understanding and mitigating the transport impacts of employment development, including impacts on the Strategic Road Network where relevant. Requirements for Transport Assessments, Travel Plans and other transport evidence are addressed through national policy, highway authority requirements and the wider transport policies of the Local Plan. These requirements will be applied where justified by the scale, nature and location of development proposals.	Comment noted. No change required
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**

Developers and agents **AM Work Space Limited** **Westcott Leach Limited** Raised an objection to the policy The policy is not complying with the requirements of national policy. The policy fails to meet the identified employment floorspace need over the plan period The policy should support the expansion of existing employment sites, which can contribute to the identified need. If expansion is not supported at certain locations, these should be identified. Policy EC2 should be amended to include the identification of the Ashdown Business Park, Michael Way, Maresfield as suitable to be both safeguarded and expanded for additional employment floorspace over the Plan period.	Policy EC2 is intended to safeguard existing Strategic Employment Sites and support their redevelopment, intensification, modernisation and limited expansion where appropriate. The policy should be read alongside the wider economic strategy, employment allocations and evidence base, which collectively seek to meet identified employment land and floorspace needs over the plan period. The suitability of individual sites for expansion has been assessed through the plan-making process, having regard to environmental, infrastructure and site-specific constraints. The Council considers that the policy is consistent with national policy and provides an appropriate framework for supporting employment growth while safeguarding existing employment land. The Council does not consider it necessary to identify specific safeguarded sites for expansion within Policy EC2.	Comment noted. No change required.
Bryan Thomas Limited Raised an objection to the policy Blackbarn Farm should be identified in Policy EC2.	The Council acknowledges the suggestion that Blackbarn Farm should be specifically identified within Policy EC2. Policy EC2	Comment noted. No change required.

	establishes a district-wide framework for economic development and identifies individual sites that form key strategic employment sites within the Local Plan as evidenced in the Employment and Economic Study (April 2022).	
Organisation with specific interest **CPRE Sussex** Supportive of the policy Concerns that it is too easy to change from business use to retail. It should also support the extension at these locations	Comment of support noted. Policy EC2 seeks to safeguard Strategic Employment Sites for employment uses and only supports ancillary uses where they remain clearly subordinate to the principal employment function and do not undermine the operation, integrity or role of the site. The Council considers that the policy provides appropriate safeguards against the loss of employment land and premises to non-employment uses. Policy EC2 already supports the redevelopment, intensification, modernisation and limited expansion of employment uses within, or immediately adjoining, Strategic Employment Sites where the criteria of the policy are met.	Comment noted. Criterion 2 of the Regulation 19 policy has been revised to support the limited expansion of strategic employment sites.
Crowborough and District Chamber of Commerce Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.

Green Transition Crowborough Raised an objection to draft Policy EC2 Existing Strategic Employment Sites In a coherent Plan, there are likely to be demands for employment sites that are over and above those currently anticipated.	The Council acknowledges that future employment needs may change over time. The Local Plan has been informed by the latest available employment evidence and provides a framework that includes safeguarding existing employment sites, allocating additional employment land and supporting the expansion of businesses where appropriate. The Council considers that the Plan provides sufficient flexibility to respond to changing economic circumstances over the plan period.	Comment noted. No change required.
<u>Resident Associations</u> **Dicker Residents Association** Supportive of the policy Opposed to the change of use of Blackbrooks Garden Centre	Comment of support noted. Policy EC2 provides a district-wide framework for assessing economic development proposals and is not intended to determine the future use of individual sites. Any proposal affecting Blackbrooks Garden Centre would be considered on its own merits against the relevant policies of the Local Plan and any other material considerations.	Comment of support noted. No changes required.
The Working Group Against Over Development Supportive of the policy	Comment of support noted. Policy EC2 seeks to safeguard Strategic Employment Sites for employment	Comment noted. Criterion 2 of the Regulation 19 policy has been revised to

Concerns that it is too easy to change from business use to retail. It should also support the extension at these locations	uses and only supports ancillary uses where they remain clearly subordinate to the principal employment function and do not undermine the operation, integrity or role of the site. The Council considers that the policy provides appropriate safeguards against the loss of employment land and premises to non-employment uses. Policy EC2 already supports the redevelopment, intensification, modernisation and limited expansion of employment uses within, or immediately adjoining, Strategic Employment Sites where the criteria of the policy are met.	support the limited expansion of strategic employment sites.
Village Concerns Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Willingdon Residents Association The strategic sites are in inappropriate locations in Willingdon and Jevington due to the lack of transport infrastructure. Sufficient parking must be provided.	Policy EC2 relates to the safeguarding and management of existing Strategic Employment Sites. No Strategic Employment Sites are identified within Willingdon or Jevington under Policy EC2. The distribution of employment development and the suitability of specific employment allocations have been considered through the	Comment noted. No change required.

	wider Local Plan evidence base and site selection process.	
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Horam Parish Council **Laughton Parish Council** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Arlington Parish Council Supportive of the policy Opposed to the change of use of Blackbrooks Garden Centre	Comment of support noted. Policy EC2 provides a district-wide framework for assessing economic development proposals and is not intended to determine the future use of individual sites. Any proposal affecting Blackbrooks Garden Centre would be considered on its own merits against the relevant policies of the Local Plan and any other material considerations.	Comment of support noted. No changes required.
Chiddingly Parish Council Supportive of the policy Major industrial/commercial development should be located within or close to their potential workforce.	Comment of support noted. The distribution of Strategic Employment Sites and employment allocations has been informed by the spatial strategy, existing employment patterns, infrastructure capacity and sustainability considerations. Policy EC2 safeguards established employment locations and supports their continued use and improvement, whilst wider Local	Comment of support noted. No changes required.

	Plan policies seek to promote sustainable travel and accessibility.	
Danehill Parish Council Supportive of the policy Opposed to the expansion of Ashdown Business Park Industrial / Employment area would be better located south of Uckfield closer to Eastbourne in order to offer employment to that area with easier access to the A27.	The Council notes this view. The distribution of employment development has been informed by the spatial strategy, employment evidence base, site availability, infrastructure capacity and sustainability considerations. Policy EC2 relates to the safeguarding and management of existing Strategic Employment Sites, while the location of new employment allocations is addressed elsewhere in the Local Plan. The Council considers that the overall employment strategy provides an appropriate distribution of employment opportunities across the District.	Comments noted. No changes required.
Heathfield & Waldron Parish Council Raised an objection to the policy Unduly restrictive commentary on potential trade counters The following sites should be included: 1. Crown Yard – Burwash Rd, 2. Monkhurst House offices, Sandy Cross Lane, 3. Burnt Oak Business Park Waldron	Comment noted. Policy EC2 seeks to ensure that ancillary uses remain subordinate to the primary employment function of Strategic Employment Sites and do not undermine their role in meeting employment needs. The Council considers that the policy provides sufficient flexibility to accommodate appropriate ancillary uses whilst	Comments noted. No changes required.

	safeguarding employment land and premises. The identification of Strategic Employment Sites has been informed by the employment evidence base and assessment of sites undertaken through the Local Plan process. The Council considers that the proposed list of Strategic Employment Sites appropriately reflects the District's strategic employment land portfolio.	
Isfield Parish Council Supportive of the policy Opposed to the development of Ashdown Business Park.	The Council notes this view. The distribution of employment development has been informed by the spatial strategy, employment evidence base, site availability, infrastructure capacity and sustainability considerations. Policy EC2 relates to the safeguarding and management of existing Strategic Employment Sites, while the location of new employment allocations is addressed elsewhere in the Local Plan. The Council considers that the overall employment strategy provides an appropriate distribution of employment opportunities across the District.	Comments noted. No changes required.

Mayfield and Five Ashes Parish Council No comment	Comment noted.	Comment noted. No changes required.
Polegate Town Council Supportive of the policy Other potential sites for large scale employment close to the strategic road network.	The identification and allocation of employment land has been informed by the employment evidence base, spatial strategy, sustainability considerations and site assessment process, including accessibility to the Strategic Road Network where appropriate. Policy EC2 relates to the safeguarding and management of existing Strategic Employment Sites rather than the allocation of new employment sites.	Comment noted. No changes required.
Rotherfield Parish Council Supportive of the policy Lack of recognition of the impact of sites on the local road infrastructure, and particularly the impact of vehicular movement on Rotherfield.	Comment of support noted. The Council acknowledges concerns regarding the potential impact of development on the local road network, including vehicular movements through Rotherfield. Transport impacts have been considered through the Local Plan evidence base and will be assessed, where relevant, through the planning application process. The Plan includes policies relating to sustainable transport, highways and infrastructure, which seek to ensure that development is supported by	Comment of support noted. No changes required.

	appropriate mitigation where necessary.	
Uckfield Town Council Supportive of the policy Small rural business sites should be added. There needs to be a better spread in relation to the working population and more coverage in the 'centre' area. There seems to be a tension between the data and the observation that demand for distribution space is stronger than that of office space. Employment needs to be provided where people live. There need to be adequate premises to accommodate all size and type of business.	Comment of support noted. Policy EC2 relates specifically to the safeguarding of Strategic Employment Sites. Smaller rural employment sites are considered through other economic development policies within the Local Plan. The distribution of employment land has been informed by the employment evidence base, settlement hierarchy, spatial strategy and site assessment process. The Council considers that the overall employment strategy provides an appropriate distribution of employment opportunities across the District. The employment strategy has been informed by the latest available evidence regarding market demand across a range of employment sectors and uses. Policy EC2 seeks to safeguard employment sites capable of accommodating a variety of business needs and does not rely solely on a single employment sector. Policy EC2 supports the redevelopment, intensification and modernisation of	Comment of support noted. No changes required.

	Strategic Employment Sites to improve the quality, flexibility and functionality of employment premises, helping to meet the needs of businesses of different sizes and sectors. The Council considers that the policy already addresses this objective.	
Willingdon and Jevington Parish Council Supportive of the policy Not appropriate for the parish due to lack of travel infrastructure and parking.	Policy EC2 relates to the safeguarding and management of existing Strategic Employment Sites. No Strategic Employment Sites are identified within Willingdon or Jevington under Policy EC2. The distribution of employment development and the suitability of specific employment allocations have been considered through the wider Local Plan evidence base and site selection process.	Comment noted. No change required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
The majority of residents are supportive of the policy with some objections Many of the sites are small scale rather than strategic Retail uses should be focused in town, district and local centres. Opposed to the expansion of Ashdown Business Park.	The identification of Strategic Employment Sites and the wider employment strategy have been informed by the employment evidence base, spatial strategy, site assessment process and sustainability considerations. Policy EC2 is intended to safeguard the District's key employment locations	Comment noted. No change required.

There should be more focus on farming/protection of farmland and employment. The Ashdown Business Park shows a failure of strategic planning. The loss of employment land at the time is part of the justification for the release of additional employment land. Industrial development in the Wealden/Eastbourne area is held back by lack of suitable road infrastructure. At least half of the sites are in the countryside away from development boundaries, which in terms of sustainability and net zero should not be supported, but are for historic reasons. Train line corridor sites through High Weald should be sought Without losing employment floor space, any well designed south facing accommodation above that space should be encouraged and permitted where possible and suitably connected with transport.	and support their redevelopment, intensification, modernisation and limited expansion where appropriate. The Council considers that the policy strikes an appropriate balance between supporting economic growth, safeguarding employment land and addressing environmental, infrastructure and sustainability considerations. Matters relating to the location of new employment allocations, housing growth, transport infrastructure, protection of agricultural land and the provision of mixed-use development are addressed through the wider policies of the Local Plan.	
Other Comments	**WDC Response**	
None		

Policy EC3: Retention and/or loss of Non-Strategic Employment Sites, Premises or Floorspace

WDC Response to the Regulation 18 Consultations

Total: 69	Support: 63	Neutral: 5	Object: 2

Policy EC3: Retention and/or Loss of Non-Strategic Employment Sites, Premises or Floorspace		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
None		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Developers and Agents</u> **Bryan Thomas Limited** Raised an objection to the policy It is unclear how non-strategic sites can develop and expand The policy could be renamed Policy EC3: Development at Non-Strategic Employment Sites and Retention and / or Loss of Non-Strategic Employment Sites, Premises or Floorspace. An additional criterion could be worded: *Suitable expansion and development at such sites subject to no adverse impacts on landscape, highways or other relevant planning consideration*.	Comment noted. Policy EC3 now specifically supports the redevelopment, intensification, modernisation and limited expansion of employment uses on non-strategic employment sites where the criteria of the policy are satisfied. The Council considers that the policy provides a clear and positive framework for the continued development and improvement of non-strategic employment sites. Policy EC3 already includes provisions supporting the redevelopment, intensification, modernisation and limited expansion of non-strategic	Comment noted. Criterion 2 of the Regulation 19 policy has been revised to support the limited expansion of non-strategic employment sites.

	employment sites, subject to criteria relating to landscape, highway and environmental impacts. The Council therefore considers that the title and wording of the policy are appropriate and sufficiently clear.	
Organisations with specific interest **CPRE Sussex** Supportive of the policy.	Comment of support noted.	Comment of support noted. No changes required.
Crowborough and District Chamber of Commerce Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Green Transition Crowborough Raised an objection to the policy In a coherent Plan, there are likely to be demands for employment sites that are over and above those currently anticipated.	The Council acknowledges that future employment needs may change over time. The Local Plan has been informed by the latest available employment evidence and provides a framework that includes safeguarding existing employment sites, allocating additional employment land and supporting the expansion of businesses where appropriate. The Council considers that the Plan provides sufficient flexibility to respond to changing economic circumstances over the plan period.	Comment noted. No change required.
Uckfield Chamber of Commerce Supportive of the policy	Comment noted.	Comment noted. Criterion 2 of the Regulation 19 policy has been revised to

It is important to maximise the use, with changes if needed, of all existing rural sites.	Policy EC3 now specifically supports the redevelopment, intensification, modernisation and limited expansion of employment uses on non-strategic employment sites where the criteria of the policy are satisfied. The Council considers that the policy provides a clear and positive framework for the continued development and improvement of non-strategic employment sites.	support the limited expansion of non-strategic employment sites.
Resident Associations **Village Concerns** **The Working Group Against Over Development** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Arlington Parish Council **Heathfield & Waldron Parish Council** **Horam Parish Council** **Rotherfield Parish Council** **Willington and Jevington Parish Council** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Laughton Parish Council Supportive of the policy There is a need within villages to retain employment sites.	Comment of support noted. Policy EC3 seeks to protect existing non-strategic employment sites, premises and floorspace from unjustified loss to non-employment uses and supports their redevelopment, improvement and	Comment of support noted. No changes required.

	expansion where appropriate. The Council considers that the policy already provides an appropriate framework for retaining village employment sites.	
Mayfield and Five Ashes Parish Council No comment	Comment noted.	Comment noted. No changes required.
Polegate Parish Council Supportive of the policy Loss of employment should be avoided.	Comment of support noted. Policy EC3 seeks to protect existing non-strategic employment sites, premises and floorspace from unjustified loss to non-employment uses and supports their redevelopment, improvement and expansion where appropriate. The Council considers that the policy already provides an appropriate framework for preventing the loss of employment sites.	Comment of support noted. No changes required.
Uckfield Town Council Supportive of the policy Strict controls need to be enforced.	Comment of support noted. Policy EC3 contains clear criteria governing the retention, redevelopment and change of use of non-strategic employment sites, premises and floorspace. Compliance with planning permissions, conditions and relevant policy requirements will continue to be monitored through the Council's established development	Comment of support noted. No changes required.

	management and enforcement processes. The Council considers that the policy provides an appropriate framework for managing change and protecting employment land.	
Local Residents	**WDC Response**	**Proposed Changes to Policy**
The majority of resident are supportive of the policy with some objections Some sites included in EC2 should be included in policy EC3 Conversion of urban sites and disused offices should be supported. Dual use with housing above should be encouraged and permitted when suitably connected with transport. Concerns about the decision timing of overlapping applications for different use-classes. Insufficient focus on the protection of farmland and employment. The policy should include a thought about pedestrian safety for workers and shoppers.	The classification of strategic and non-strategic employment sites has been informed by the employment evidence base and site assessment process. Policy EC3 supports the retention, redevelopment and modernisation of non-strategic employment sites whilst allowing alternative employment-generating uses where appropriate. Matters relating to mixed-use development, housing above commercial premises, pedestrian safety, protection of agricultural land and the determination of planning applications are addressed through the wider policies of the Local Plan and relevant planning procedures.	Comment noted. No changes required.
Other Comments	**WDC Response**	
None		

Policy EC4: Rural Economy

WDC Response to the Regulation 18 Consultations

Total: 88	Support: 65	Object: 15	Neutral: 8

Policy EC4: Rural Economy		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Natural England We advise that this Policy should include a provision for the avoidance of impacts to habitats and species.	Criterion 1(b) and criterion 3(d) already require proposals to avoid unacceptable harm to the natural environment, and all proposals are subject to the wider biodiversity and nature conservation policies of the Local Plan, together with relevant environmental legislation. The Council therefore considers that impacts on habitats and species are adequately addressed within the existing policy framework.	Comment noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Developers and agents</u> **Firle Estate** Raised an objection to the policy	Comment noted. The Council considers that the policy strikes an appropriate balance between supporting economic	Comment noted. No changes required.

The policy is too restrictive and should be redrafted.	development and ensuring that proposals are sustainable and do not result in unacceptable environmental, amenity or infrastructure impacts. The criteria are necessary to provide a clear and consistent framework for decision-making and have been informed by the plan evidence base and national policy.	
Neville Estate Company Raised an objection to the policy Para 1.e) should be deleted as existing traditional buildings are redundant for agricultural purposes.	Criterion 2(a) of the Regulation 19 version of the policy reflects the sequential approach of prioritising the reuse or adaptation of existing buildings where they are reasonably available and suitable. This helps to minimise the need for new buildings in the countryside and supports the efficient use of land and existing resources. The policy does not require the reuse of buildings that are unsuitable for the proposed enterprise, and criterion 2(b) allows new buildings where they are demonstrated to be necessary. The Council therefore considers that the existing wording provides an appropriate and balanced approach.	Comment noted. No changes required
High Weald National Landscape	Comment noted.	Comment noted. No changes required.

Include cross-referencing with policy NE7	Policy EC4 should be read alongside the Local Plan as a whole, including relevant environmental policies such as Policy NE7 where applicable. The Council does not generally cross-reference all related policies within individual policy wording, as this can create unnecessary duplication.	
Organisation with specific interest **Conservator of the Ashdown Forest** The plan should be clear that otherwise permitted developments are not always allowable within High Weald National Landscape, and they should be considered in this context within the zone of influence of the Ashdown Forest.	The operation of permitted development rights is established through national legislation and cannot be amended through this policy. Proposals requiring planning permission within the High Weald National Landscape or within the zone of influence of the Ashdown Forest will be assessed against the relevant policies of the Local Plan, including those relating to landscape, biodiversity and protected sites.	Comment noted. No changes required.
CPRE Sussex Raised an objection to the policy There does not seem to be restrictions on new buildings in part 1 of the policy	Policy EC4 adopts a sequential approach which prioritises the reuse or adaptation of existing buildings where reasonably available and suitable before supporting new buildings in the countryside. In addition, criterion 3 requires that any new building is supported by a justified business case, is	Comment noted. No changes required.

	appropriate in scale to the needs of the enterprise, reflects its functional purpose and local distinctiveness, and does not result in unacceptable harm to landscape character, the natural environment or heritage assets. The Council considers that these requirements provide appropriate controls on new buildings in rural areas.	
Transport Future East Sussex Supportive of the policy A requirement for accessibility by sustainable transport should be added.	The Council agrees that accessibility by sustainable transport is an important consideration in supporting sustainable economic development. However, accessibility and sustainable transport requirements are addressed through the wider spatial strategy and relevant transport policies of the Local Plan and to some extent, through policy Criterion 1d.	Comments of support noted. No changes required.
Wealden Food Partnership Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.
<u>Resident Associations</u> **Dicker Residents Association** **Village Concerns** **Willingdon Residents' Association** Supportive of the policy	Comment of support noted.	Comments of support noted. No changes required.

The Working Group Against Over Development Raised an objection to the policy There does not seem to be restrictions on new buildings in part 1 of the policy	Policy EC4 adopts a sequential approach which prioritises the reuse or adaptation of existing buildings where reasonably available and suitable before supporting new buildings in the countryside. In addition, criterion 3 requires that any new building is supported by a justified business case, is appropriate in scale to the needs of the enterprise, reflects its functional purpose and local distinctiveness, and does not result in unacceptable harm to landscape character, the natural environment or heritage assets. The Council considers that these requirements provide appropriate controls on new buildings in rural areas.	Comment noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Arlington Parish Council Supportive of the policy More flexibility should be introduced in relation to accommodation for workers.	Comment of support noted. The provision of workers' accommodation is addressed through separate housing and rural workers' accommodation policies within the Local Plan. Policy EC4 is intended to provide a framework for supporting rural economic development and business growth. The Council considers that the wider policy framework already provides	Comment of support noted. No changes required.

	appropriate flexibility to consider accommodation needs where justified.	
Chalvington With Ripe Parish Council Supportive of the policy Wishes to see more encouragement for small businesses.	Comment of support noted.	Comment of support noted. No changes required.
Frant Parish Council **Maresfield Parish Council** Supportive of the policy For criterion 1.a), this should include submissions such as a business plans For criterion 1.g), add the following: '*...and the site's existing vehicular access is suitable or can be made suitable without harm for the proposed use'* For criterion 3. d), amend as follow: '*The design, scale and location of the building and its curtilage relates well to the intended rural use...*'	The policy already requires sufficient information to be submitted to demonstrate compliance with its criteria, and the Council considers that references to supporting documentation, such as business plans, can be addressed through validation requirements and supporting guidance rather than policy wording. The Council agrees that access suitability is an important consideration and notes that this is already addressed through the policy's requirements relating to access, highways and transport impacts. The Council also considers that criterion 3 already provides an appropriate framework for assessing the relationship between a building, its setting and its intended use. The proposed amendment would not	Comment of support noted. No changes required.

	materially alter the operation of the policy.	
Heathfield & Waldron Parish Council Supportive of the policy Commercial benefit of commercial development should be balanced against the potential environmental and biodiversity impacts.	The Local Plan seeks to achieve sustainable development by balancing economic, social and environmental objectives, and proposals will be assessed against relevant policies relating to biodiversity, landscape, environmental protection and economic growth. The Council considers that these matters are adequately addressed through the Plan as a whole.	Comment of support noted. No changes required.
Horam Parish Council Raised an objection to the policy Amend the policy to only encourage the provision of EV charging points.	Policy EC4 does not require the provision of electric vehicle charging infrastructure and supports rural economic development through a flexible approach that balances business needs with sustainability objectives. Requirements for EV charging infrastructure are addressed through other relevant Local Plan policies and will be considered having regard to the nature and scale of the development.	Comment noted. No changes required.
Isfield Parish Council Supportive of the policy	Policy EC4 is intended to support the sustainable growth, expansion and	Comment of support noted. No changes required.

The policy should clarify that rural business development is not a route to residential development.	diversification of rural businesses and enterprises. Proposals for residential development are addressed through separate housing policies within the Local Plan and would be assessed against the relevant policy framework.	
Laughton Parish Council Supportive of the policy More support should be given to renewables	Comment of support noted. Renewable energy development is addressed through specific climate change policies elsewhere in the Local Plan. Policy EC4 is intended to provide a framework for supporting rural economic development and diversification and should be read alongside the wider policy framework.	Comment of support noted. No changes required.
Mayfield and Five Ashes Parish Council No comment	Comment noted.	Comment noted. No changes required.
Pevensey Parish Council Raised an objection to the policy The policy as drafted is too broad and could permit employment development outside development boundaries in rural areas.	Comment noted. Policy EC4 is specifically intended to support the sustainable growth, expansion and diversification of rural businesses and enterprises where proposals are appropriate to their countryside location. The policy includes criteria relating to scale, siting, design, landscape impact, accessibility, highway impacts and effects on neighbouring uses,	Comment noted. No changes required.

	together with specific requirements for new buildings. These provisions ensure that rural economic development is carefully controlled and does not result in inappropriate development in the countryside.	
Polegate Town Council Supportive of the policy Must ensure that legal agreements are in place for any change of use or redundant buildings.	Comment of support noted. The need for planning conditions, legal agreements or other controls will be considered on a case-by-case basis having regard to the nature of the proposal and the requirements of relevant Local Plan policies. Existing planning legislation provides mechanisms to secure and enforce planning obligations where necessary.	Comment of support noted. No changes required.
Rotherfield Parish Council Supportive of the policy Enforcement resources will be kept to part 3 of the policy	Comment noted.	Comment noted. No changes required.
Uckfield Town Council Supportive of the policy Consideration needs to be given to public access and facilities. Add a specific reference to local food production and cultivation, which would align with the statement concerning resilience early in the draft Plan.	The Council recognises the importance of public access, supporting local food production and making effective use of existing buildings in rural areas and this is partly covered in criterion 4. These matters are addressed through the wider policies of the Local Plan relating to the rural economy, sustainable development,	Comment noted. No changes required.

The use or conversion of redundant buildings should be encouraged, although they should not become additional dwellings.	community facilities and the reuse of existing buildings. The Council supports the appropriate reuse and conversion of redundant rural buildings where this accords with relevant policy objectives. However, the policy seeks to ensure that such proposals contribute positively to the rural economy and do not result in inappropriate forms of development.	
Local Residents	**WDC Response**	**Proposed Changes to Policy**
The majority of residents are supportive of the policy with some objections All new development allocation should be linked to the land if supports and never sold off separately. Insufficient emphasis is given in the draft Local Plan to the protection of farm land and employment where development is proposed which will result in the loss of jobs and sustainable agricultural businesses Questions the relationship between part 1 and national policy that seem to conflict. Part 2 could be strengthened, with further resource allocate to assessing real impacts. Further guidance on what might be appropriate for different locations and situations with factors to be considered would be useful. Encouragement of community engagement by landowners/developers would also be helpful.	The Local Plan seeks to balance the protection of agricultural land, rural businesses, employment opportunities, environmental assets and rural character with the need to support sustainable development. Matters relating to EV charging, community engagement, the reuse of rural buildings, impacts on agricultural land and employment, and the relationship with national policy are addressed through the wider Local Plan framework and relevant guidance. The Council considers the policy provides an appropriate and proportionate basis for decision-making and that	Comment noted. No changes required.

Add a reference to small scale for clarity Amend the policy to only encourage the provision of EV charging points. Building housing and commercial premises on existing and previous agricultural sites reduces the possibility of future UK food and energy independence. Positive incentives to attract long term agricultural use are needed. Avoid conflicting policies with putting housing/development of countryside before the protection of amenity. Para 1.e) should be deleted as existing traditional buildings are redundant for agricultural purposes. Insufficient focus on the protection of farmland and employment. Questions the necessity of EV charging points	additional amendments are not necessary.	
Other Comments	**WDC Response**	
None		

Policy EC5: Equestrian Development

WDC Response to the Regulation 18 Consultations

Total: 62	Support: 54	Neutral: 5	Object: 3

Policy EC5: Equestrian Development		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
East Sussex County Council Supportive of the policy.	Comment of support noted.	Comment of support noted. No changes required.
Natural England Policy EC5 – Change required. Policy should include provision for the avoidance of impacts to habitats and species and protected landscapes.	Criterion 1(a) and 1(e) already require proposals to avoid unacceptable harm to landscape character, visual amenity and wildlife. In addition, all proposals will be assessed against the wider biodiversity, landscape and environmental policies of the Local Plan, together with relevant national legislation.	Comment noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Organisation with specific interest</u> **Clarity Ecoworks** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.

High Weald National Landscape Policy should include cross-referencing with Policy NE10 (Light Pollution and Dark Skies)	Criterion 1(e) of Policy EC5 already requires outdoor lighting and floodlighting to be designed to avoid unacceptable impacts on visual amenity, wildlife and highway safety. In addition, Policy EC5 should be read alongside the wider policies of the Local Plan, including those relating to light pollution and dark skies where relevant.	Comment noted. No changes required.
Conservators of Ashdown Forest Equestrian development have the potential to have negative impacts on connectivity and corridors for nature recovery and conservation within protected areas. The Zone of Influence around the Ashdown Forest should include reference to and provisions for mitigating impacts on the Forest from equestrian development, perhaps taking a 'total area allowable' cap approach.	The Council acknowledges that equestrian development can have implications for biodiversity, habitat connectivity and nature recovery networks. However, these matters are addressed through the wider biodiversity, nature conservation and landscape policies of the Local Plan, which apply to all development proposals where relevant. Proposals within the Zone of Influence of the Ashdown Forest will be assessed in accordance with the requirements of the Habitats Regulations, relevant Local Plan policies and any necessary mitigation measures. As these requirements arise through separate legislation and apply irrespective of the wording of Policy EC5, the Council does not consider it	Comment noted. No changes required.

	necessary to include a specific reference within this policy.	
CPRE Sussex Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Residents Associations **Dicker Residents Association** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Friends of Park Wood Hellingly Supportive of the policy Concerns over lost of route due to over development and poorly managed rights of way.	Comment of support noted. The Council recognises the importance of protecting public rights of way and maintaining access to the countryside. Impacts on public rights of way, access and recreational routes will be considered through the planning application process and assessed against relevant Local Plan policies.	Comment of support noted. No changes required.
Village Concerns Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
The Working Group Against Over Development Supportive of the policy Default position for any permission should be the removal of permitted development rights, which will only be restored in exceptional circumstances.	Comment of support noted. The Council does not consider it appropriate to apply a blanket removal of permitted development rights to all permissions. The need for planning conditions removing permitted development rights will be considered on a case-by-case basis where justified by the specific	Comment of support noted. No changes required.

	circumstances of a proposal, consistent with national policy and the tests for planning conditions.	
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Horam Parish Council Raised an objection to the policy. Criteria 1h should be expanded to include horse boxes only being parked and stored in designated areas. Isolated locations are in some cases a better place to have equestrian facilities due to increased volume of traffic in rural areas Wealden should ensure that there are assigned parking places for horseboxes adjacent to The Cuckoo Trail and any other car park close to a bridleway for horseboxes to park, unload and load safely. Sub-division of fields is sometimes necessary for the health and well-being of the horses. More education needed for other road users. New developments should include in their documentation for residents, advice from The British Horse Society's 'Dead Slow' campaign. The word 'desirable' should be removed from 11.51 as not in the British Horse Society's wording regarding acreage per animal. Regarding 11.52 lighting/floodlighting- in order for a business to remain viable when daylight is short, extra lighting may be essential, especially for a riding school which relies on giving lessons as their main income. If no	Policy EC5 seeks to support equestrian development whilst ensuring that impacts on the countryside, landscape character, highway safety and neighbouring amenity are appropriately managed. The detailed layout, parking, horse welfare arrangements, field subdivision, lighting and operational requirements of equestrian facilities will be considered on a site-by-site basis having regard to the specific circumstances of the proposal. The Council recognises that equestrian enterprises can have particular operational requirements, but considers that the policy already provides an appropriate balance between supporting equestrian activities and protecting the rural environment.	Comment noted. No changes required.

lighting, then children who might have a lesson after school or adults wishing to have a lesson after work would be unable to which would result in a substantial loss of income for the business.		
Mayfield and Five Ashes Parish Council No comment.	Comment noted.	Comment noted. No changes required.
Heathfield & Waldron Parish Council Supportive of the policy Where suggestion is made that ratios of horses requiring 1-1.5 acres this should be mitigated for instances where the welfare of the animal a more restricted space is required (sickness, lameness etc., etc.,) which may mean this ratio could be reduced. In addition, the requirements on such sites can mean increased shelter, storage should be considered in reviewing applications. In addition, the removal of permitted development rights would be wrong in circumstances where the size of paddocks need to be reduced for good reason.	Comment of support noted. The Council acknowledges that equine welfare requirements can vary depending on the age, health and management needs of individual animals and that provision for shelter, storage and paddock management may be necessary in some circumstances. However, the supporting text and policy are intended to provide general guidance rather than prescriptive standards, and proposals will be assessed on their individual merits having regard to animal welfare, operational requirements, landscape character and other relevant planning considerations. The Council also considers that decisions on the removal of permitted development rights should be made on a case-by-case basis where justified by the circumstances of the site and proposal.	Comment of support noted. No changes required.

Rotherfield Parish Council and Polegate Town Council Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Uckfield Town Council Raised an objection to the policy Consideration needs to be given to public access and facilities. Positive consideration when granting change of use needs to be given to the importance of access to these sites/units re: the use of country lanes for lorries etc and the provision of utilities i.e. sewerage, waste disposal, energy efficiency of buildings, power supplies etc. The use or conversion of redundant buildings should be encouraged to avoid them falling into disrepair and dangerous condition. Redundant buildings should not become additional dwellings. The use of bridleways should be controlled to avoid them being reduced to a state where walkers are inhibited from using them through degradation.	Policy EC5 is intended to provide a framework for assessing equestrian development proposals. Matters relating to public rights of way, access and associated facilities will be considered where relevant through the assessment of individual proposals and the wider policy framework. The Council acknowledges the importance of ensuring that equestrian development is supported by appropriate access and infrastructure. Criteria 1(d) and 1(f) already require suitable drainage, waste management, access, parking and consideration of traffic impacts on the rural road network. The Council agrees that the reuse of suitable existing buildings can represent a sustainable approach and criterion 1(b) already prioritises the reuse or adaptation of existing buildings where reasonably available and suitable. Proposals for residential use are addressed	Comments noted. No changes required.

	through separate housing policies within the Local Plan.	
Local Residents	**WDC Response**	**Proposed Changes to Policy**
The majority of residents are supportive of the policy Fail to prevent change of use to deliberately ran down operations. Change of use should be resisted and land that was originally agricultural, should be confined to agricultural usage. Good access is often required for such structures which their positioning to not effect the local aesthetic is not considered. Positive incentives to attract long term agricultural use are needed.	The Council acknowledges concerns regarding the loss of agricultural land and businesses through changes of use, the need to support the long-term viability of agriculture, and the importance of ensuring that rural development is appropriately located and accessed without causing unacceptable impacts on landscape character and visual amenity. The policy seeks to balance the protection of agricultural land, rural businesses and the countryside with the need to support sustainable rural development.	Comments noted. No changes required.
Other Comments	**WDC Response**	
None.		

Policy EC6: Tourism Facilities and Attractions

WDC Response to the Regulation 18 Consultations

Total: 81	Support: 63	Neutral: 6	Object: 11

Policy EC6: Tourism Facilities and Attractions		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
East Sussex County Council Supportive of the policy Farleys House and Gallery should be named in para 11.57as a biopic is due to be release which will raise its profile. The policy may restrict new estates from developing tourism offer to diversify business and contribute to the WDC's overall ambition for tourism.	Comment of support noted. The supporting text is not intended to provide a comprehensive list of tourism attractions, and the Council does not consider it necessary to identify individual facilities within the policy context. The policy supports new, expanded and diversified tourism facilities and attractions where they contribute positively to the visitor economy and are appropriate to their location. The Council considers that the policy provides sufficient flexibility to support tourism diversification while ensuring that development remains sustainable and respects its surroundings.	Comments of support noted. No changes required.

Natural England Policy should reflect the potential that Wealden has for eco-tourism and the benefit to the local economy by the draw of visitors to the rich and diverse district of Wealden	Policy EC6 seeks to support sustainable tourism development and visitor accommodation, helping visitors to enjoy and experience Wealden's landscape, countryside, heritage and natural environment whilst ensuring that environmental impacts are appropriately managed. The Council considers that the updated policy provides an appropriate framework to support sustainable tourism and its economic benefits.	Comments noted. Changes have been made to criterion 2 to be more positively worded on proposals for tourism facilities and attractions outside development boundaries within the Regulation 19 Local Plan.
Network Rail Supportive of the policy Greater focus should be given to the role the railway can play in tourism and allowing people to access opportunities	Comment of support noted. The Council recognises the important role that the railway network can play in supporting tourism by providing sustainable access to visitor attractions, settlements and the wider countryside. However, the role of rail infrastructure and sustainable transport is addressed through the wider transport, infrastructure and economic policies of the Local Plan.	Comment of support noted. No changes required.
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
Eastbourne Borough Council Supportive of the policy Supportive of measures to enhance the visitor economy across the wider areas to attract more visitors, particularly overnight stay	Comment of supported noted.	Comment of support noted. No changes required.

Other Consultee Bodies	WDC Response	Proposed Changes to Policy
Developer and Agents **Bea's Farm Charcuterie** **KLW** **Nevill Estate Company** **The Marquess of Christopher Abergavenny** Raised an objection to the policy Object to criteria 1.b as the majority of tourist and recreation attraction are in rural areas rather than in the defined settlement boundaries The policy should be redrafted to support and encourage the sensitive provision of new and the expansion of existing tourism and outdoor recreational businesses: particularly in the national landscapes, in particular the provision of new campsites. The policy should be more flexible.	Policy EC6 seeks to support sustainable tourism development whilst ensuring that proposals are appropriately located and accessible. The policy does not preclude tourism and recreation development in rural areas where it is suitable to its location and complies with the relevant policy criteria. The Council considers that the policy provides an appropriate balance between supporting tourism and protecting the countryside. Policy EC6 has been drafted to support a range of tourism and recreation proposals whilst ensuring that development is appropriate to its location and does not cause unacceptable environmental, infrastructure or amenity impacts. The Council considers that the policy provides sufficient flexibility to respond to differing types of tourism and recreation development.	Comments noted. Changes have been made to criterion 2 to be more positively worded on proposals for tourism facilities and attractions outside development boundaries within the Regulation 19 Local Plan.
Organisations with specific interest **Conservators of the Ashdown Forest** There are seasonal variations within the Ashdown Forest areas requiring seasonal wardens to	The Council recognises the sensitivity of the Ashdown Forest and the importance of appropriate visitor management measures, including seasonal wardens where justified. The Council also acknowledges the	Comments noted. No changes required.

mitigate access and improve behaviours of visiting people from outside the area The nature of the Asdown Forest may be better suiter to local small scale eco-facilities which may be more viable and relevant in rural settings close to the Forest. The exclusion zone for the forest may limit this potential, and any revision to the zone would need to be carefully considered.	potential role of small-scale, nature-based tourism and eco-accommodation in suitable rural locations. The implications of development for Ashdown Forest, including the effects of visitor pressure and the application of any zones of influence, are addressed through the relevant environmental policies, evidence base and Habitat Regulations Assessment.	
CPRE Sussex Challenge in encouraging tourism without harming the feature tourists seek to visit In theory the Council should be discouraging visits to the Ashdown Forest. Note recent changes at Bewl Water following event.	Policy EC6 seeks to support sustainable tourism development whilst ensuring that environmental impacts are appropriately managed. Proposals affecting internationally, nationally or locally designated sites, including Ashdown Forest, will be assessed against the relevant environmental, habitat protection and landscape policies of the Local Plan, together with other applicable legislation and guidance. The Council considers that the existing policy framework provides appropriate safeguards to ensure tourism growth does not result in unacceptable harm to the very assets that attract visitors.	Comments noted. No changes required

Clarity Ecoworks Supportive of the policy	Comment of supported noted.	Comment of support noted. No changes required.
Greenbank Supportive of the policy The marketing of Wealden High Weald should be carefully considered Concerns with attracting too many people which could impact on ecosystems	Policy EC6 seeks to support sustainable tourism development while ensuring that environmental impacts are appropriately managed. Proposals that could affect sensitive habitats, designated landscapes or other environmental assets will be assessed against the relevant environmental, biodiversity and landscape policies of the Local Plan. The Council considers that the existing policy framework provides appropriate safeguards to ensure that tourism growth does not result in unacceptable harm to ecosystems or the special qualities of the High Weald National Landscape.	Comment of support noted. No changes required.
Green Transition Crowborough Raised an objection to the policy A successful tourism strategy and one that could contribute more to the overall Plan, would be one which would take new directions, taking advantage of local competitive advantages and guided by a comprehensive Destination Management Strategy	Policy EC6 provides a framework to support sustainable tourism and visitor attractions whilst protecting the District's environmental, landscape and heritage assets. The preparation and implementation of tourism promotion initiatives and destination management strategies are matters that sit alongside the Local Plan and may be pursued through separate Council strategies and partnership working. The	Comment noted. No changes required.

	Council considers that Policy EC6 provides an appropriate planning framework for supporting tourism development.	
National Trust Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Transport Future East Sussex Supportive of the policy Concerns over the loss by attrition of parts of protected areas such as 'semi natural ancient woodland' or pollution of water courses/catchments.	Comment of support noted. Policy EC6 should be read alongside the wider biodiversity, landscape, water environment and habitat protection policies of the Local Plan, which require adverse impacts on protected habitats and ecological networks to be avoided, mitigated or compensated where appropriate.	Comment of support noted. No changes required.
Residents Associations **Dicker Residents Association** Supportive of the policy Tourism should be considered as a whole to maintain and protect the surrounding of tourist locations from over development	Comment of support noted. Policy EC6 seeks to support sustainable tourism whilst ensuring that proposals are appropriately located and do not result in unacceptable impacts on the character of the area, the natural environment or local communities. In addition, tourism proposals will be assessed against the wider environmental, landscape and infrastructure policies of the Local Plan.	Comment of support noted. No changes required.
The Working Group Against Over Development	Policy EC6 seeks to support sustainable tourism development whilst ensuring	Comments noted. No changes required

Challenge in encouraging tourism without harming the feature tourists seek to visit In theory the Council should be discouraging visits to the Ashdown Forest. Note recent changes at Bewl Water following event	that environmental impacts are appropriately managed. Proposals affecting internationally, nationally or locally designated sites, including Ashdown Forest, will be assessed against the relevant environmental, habitat protection and landscape policies of the Local Plan, together with other applicable legislation and guidance. The Council considers that the existing policy framework provides appropriate safeguards to ensure tourism growth does not result in unacceptable harm to the very assets that attract visitors.	
Village Concerns Supportive of the policy	Comment of supported noted.	Comment of support noted. No changes required.
Willingdon Residents Association Supportive of the policy	Comment of supported noted.	Comment of support noted. No changes required.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Horam Parish Council Raised an objection to the policy Criteria 2 seems to be restricting new outside investment in the tourism/leisure industry Criteria 1.b should read "*Where possible is easily accessible by sustainable modes of transport, including walking and cycling*;" Locating tourism within development boundary is limiting and could become a nuisance to residents	Policy EC6 seeks to support sustainable tourism and leisure development, including investment that contributes to the local economy. The policy does not distinguish between local and external investment, but seeks to ensure that proposals are appropriately located, sustainable and do not result in unacceptable impacts. The Council considers that the policy provides a	Comments noted. Changes have been made to criterion 2 to be more positively worded on proposals for tourism facilities and attractions outside development boundaries within the Regulation 19 Local Plan.

	more positive framework at the Regulation 19 stage following amendments. The policy is intended to support sustainable travel whilst recognising that some tourism and recreation uses are inherently rural in nature and may not always be accessible by all sustainable transport modes. The Council considers that the existing wording provides appropriate flexibility and aligns with the wider transport and sustainability objectives of the Local Plan.	
Heathfield & Waldron Parish Council **Laughton Parish Council** **Rotherfield Parish Council** **Willingdon and Jevington Parish Council** Supportive of the policy	Comment of supported noted.	Comment of support noted. No changes required.
Mayfield and Five Ashes No comment	Comment noted.	Comment noted. No changes required.
Pevensey Parish Council Supportive of the policy The Council could explore Council owned camp sites for motorhomes and caravans. This could bring in a source of income and in many cases be lucrative.	Comment of supported noted.	Comment of support noted. No changes required.
Uckfield Town Council Supportive of the policy More consideration is needed to promote and control Airbnb accommodation	The operation and regulation of short-term holiday accommodation, including Airbnb-style accommodation, is influenced by	Comment of support noted. No changes required.

Planning the development of future housing, needs better control to deliver the provision of low cost and smaller houses to allow a more diverse working population to support the tourism industry and encourage service jobs and employment	national legislation and policy. Policy EC6 and EC7 supports sustainable tourism and visitor accommodation, while proposals for new tourist accommodation will be assessed against the relevant policies of the Local Plan. The Council does not consider it necessary to include specific provisions relating to Airbnb accommodation within this policy. The Council recognises the importance of providing a range of housing types and tenures to support local employment and economic growth, including within the tourism sector. However, housing mix, affordability and the delivery of smaller homes are addressed through the housing policies of the Local Plan rather than Policy EC6.	
Local Residents	**WDC Response**	**Proposed Changes to Policy**
The majority of residents are supportive of the policy with come objections Policy is too restrictive and may constrain tourism growth, particularly new tourism attractions and businesses. Requirement to locate tourism development within settlement boundaries is too limiting, especially in a predominantly rural district.	The policy seeks to support sustainable tourism development and investment whilst ensuring that proposals are appropriately located and do not result in unacceptable impacts on the environment, landscape, infrastructure, agricultural businesses or residential amenity. Policy EC6 is intended to be read alongside the wider economic,	Comments noted. Changes have been made to criterion 2 to be more positively worded on proposals for tourism facilities and attractions outside development boundaries within the Regulation 19 Local Plan.

Insufficient support for rural tourism development, despite rural landscapes being a key visitor attraction. Lack of flexibility for agricultural and forestry diversification, including camping and other tourism uses. Potential barriers to attracting external investment in the tourism and leisure sector. Risk of preventing the expansion of existing tourism businesses and the development of new tourism opportunities in the countryside. Need for stronger support for campsites and alternative visitor accommodation, such as holiday lodges, shepherd's huts and cabins. Concern that tourism development within settlements could create impacts on residents, including noise and traffic. Need for greater flexibility in policy wording to enable tourism uses while protecting environmental and landscape quality. Parking and access issues at tourism destinations, highlighted through concerns about the woodcraft area in Frant Wood. Need to protect environmentally sensitive sites from tourism development, particularly Bewl Water due to its importance for wildlife and potential ecological designations. Importance of tourism to local economies, including areas such as Pevensey Bay, and the need to protect and support the sector.	tourism, countryside, environmental and transport policies of the Local Plan, which collectively provide flexibility for appropriate rural tourism development whilst safeguarding the District's valued assets. The Council considers that the policy strikes an appropriate balance between supporting tourism growth and protecting environmental, landscape and community interests.	

Insufficient visitor infrastructure, particularly the need for public toilets to support tourism and local communities. Need to protect agricultural businesses, farmland and associated employment, where tourism or other development could result in their loss. Concern that loss of agricultural enterprises could have wider negative economic impacts, including effects on local jobs, education opportunities, tourism and food production.		
Other Comments	**WDC Response**	
None		

Policy EC7: Visitor Accommodation

WDC Response to the Regulation 18 Consultations

Total: 75	Support: 57	Neutral: 5	Object: 13

Policy EC7: Visitor Accommodation		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
Natural England The policy should include a criteria to ensure any impact to the Ashdown Forest SPA is mitigated.	The Council agrees that development proposals should avoid adverse effects on the integrity of the Ashdown Forest SPA and other protected sites. However, the	Comments noted. No change required.

	requirement to assess and mitigate potential impacts on Ashdown Forest is addressed through the Plan's biodiversity and habitat protection policies, together with the Habitat Regulations Assessment process. The Council does not consider it necessary to duplicate these requirements within Policy EC7.	
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Developer and agents</u> **Catesby Strategic Land Limited** **Mr & Mrs Batcheller** **Mr Brian Dodd & Mr & Mrs Hawes** **Sifelle Limited** Criteria 2c – the requirement for the provision of sustainable transport options would place financial burden on applicant's and will make proposals unviable.	The policy seeks to ensure that visitor accommodation is accessible by a range of transport modes and supports sustainable travel objectives. Any transport-related requirements will be applied proportionately, taking account of the scale, nature and location of the proposal. The Council considers that the policy provides sufficient flexibility and does not impose unreasonable burdens on development.	Comments noted. No change required.
<u>Organisations with specific interests</u> **Clarity Ecowoks** Supportive of the policy.	Comments of support noted.	Comments of support noted. No change required.

Conservators of the Ashdown Forest There are seasonal variations within the Ashdown Forest areas requiring seasonal wardens to mitigate access and improve behaviours of visiting people from outside the area The nature of the Ashdown Forest may be better suiter to local small scale eco-facilities which may be more viable and relevant in rural settings close to the Forest. The exclusion zone for the forest may limit this potential, and any revision to the zone would need to be carefully considered.	Policy EC7 seeks to ensure that development and recreational activity affecting Ashdown Forest are appropriately managed and that any adverse impacts are avoided or adequately mitigated. The Council acknowledges the potential role of appropriately scaled eco-tourism facilities but considers that proposals should be assessed on their individual merits against the policy criteria and relevant habitat protection requirements. The Council considers that the policy provides an appropriate framework for managing recreational pressures whilst supporting sustainable access and enjoyment of the Forest.	Comments noted. No change required.
CPRE Sussex Question whether all available visitor accommodation have been picked up by the survey. Concerned with the number of properties being taken out of residential use and used for visitors.	The evidence base supporting the Local Plan has been prepared using the most robust and up-to-date information available at the time of preparation. The Council acknowledges that visitor accommodation provision can change over time but considers that the evidence provides an appropriate basis for informing the policy approach. Policy EC7 seeks to support the visitor economy whilst balancing wider	Comments noted. No change required.

	housing and community objectives. Proposals involving changes of use will continue to be assessed against the relevant policies of the Local Plan and other material considerations. The Council considers that the existing policy framework provides an appropriate balance between supporting tourism and protecting the supply of residential accommodation.	
Friend of the South Downs Protecting the landscape of the Park is often incompatible with providing tourist accommodation, and problems are being caused by pressure to develop camp sites. Camping and similar visitor facilities accessible to, but outside the Park should be promoted.	Policy EC7 requires proposals to be assessed against the wider policies of the Local Plan, including those relating to landscape protection and environmental impacts. The Council also acknowledges the potential role of visitor accommodation outside sensitive landscape areas where this is appropriately located and accessible. The policy provides sufficient flexibility to support sustainable tourism development whilst safeguarding valued landscapes.	Comments noted. No change required.
Sussex Ornithological Society Policy may not be robust enough to support refusals of permission for camping and/or "glamping" sites on, or close to, protected or sensitive wildlife areas, including Ancient	Policy EC7 should be read alongside the wider biodiversity, landscape, habitat protection and environmental policies of the Local Plan, which provide a framework for assessing	Comments noted. No change required.

Woodland and areas of water, such as reservoirs. Explicit wording against plans for permanent holiday lodge developments on, or near, such sites should be included in the policy.	and, where necessary, resisting development that would result in unacceptable harm to such assets. The Council considers that these policies, when read together, provide appropriate safeguards for environmentally sensitive locations and that additional restrictions within Policy EC7 are not necessary.	
Residents Associations **Dicker Residents Association** Supportive of the policy	Comments of support noted.	Comments of support noted. No change required.
The Working Group Against Overdevelopment Question whether all available visitor accommodation have been picked up by the survey Concerned with the number of properties being taken out of residential use and used for visitors	The evidence supporting the Local Plan has been prepared using the best available information at the time and will be kept under review where appropriate. Proposals involving the loss of residential accommodation or the change of use of visitor accommodation will be assessed against the relevant policies of the Local Plan to ensure an appropriate balance is maintained between housing needs and the visitor economy.	Comment noted. No change required.
Village Concerns Supportive of the policy	Comments of support noted.	Comments of support noted. No change required.
Willingdon Residents Association Limited visitor accommodation with our area	Policy EC7 seeks to support the provision of appropriate visitor	Comment noted. No changes required.

	accommodation that contributes to the local economy whilst ensuring that development is sustainable and does not adversely affect the environment, landscape or local communities. The Council's evidence base has informed the approach to tourism and visitor accommodation and the policy provides a framework for supporting suitable proposals where they accord with the wider objectives of the Local Plan.	
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Heathfield and Waldron Parish Council It appears "wild camping" sites are omitted it should also be stressed that on any sites considered for such sites with minimal facilities/ buildings etc those buildings that are permitted should be appropriate to the area and blend in as far as possible.	Policy EC7 is intended to provide a framework for considering a range of visitor accommodation proposals, including low-impact forms of tourist accommodation where appropriate. The design, scale, siting and appearance of any associated buildings or structures will be assessed against the relevant criteria of the policy and the wider landscape, design and environmental policies of the Local Plan to ensure that they are appropriate to their setting and do not result in unacceptable harm to the character of the area.	Comment noted. No changes required.

Horam Parish Council Restricting new accommodation to Development Boundaries is constricting and probably counterproductive. We have glorious countryside and it is there the visitors may well want to stay.	Policy EC7 seeks to support sustainable visitor accommodation whilst ensuring that development is appropriately located and does not result in unacceptable impacts on the countryside, landscape, biodiversity or local communities. The policy recognises that some forms of visitor accommodation may be appropriately located in rural areas where they relate to the character and function of the countryside and comply with the relevant policy criteria.	Comment noted. No changes required.
Laughton Parish Council Support for policy	Comment of support noted.	Comment noted. No changes required.
Mayfield and Five Ashes Parish Council No comment	Comment noted.	Comment noted. No changes required.
Pevensey Parish Council Object to policy We are concerned that the policy is too permissive for extensions to caravan and camping sites outside settlement boundaries in the open countryside. We do not consider that what is meant by non-serviced tourist accommodation is sufficiently clear which is supported across the whole district. We are also concerned that the policy does not itself require that the loss of visitor	The Council acknowledges concerns regarding the scope of the policy, the definition of non-serviced visitor accommodation and the approach to the expansion of caravan and camping sites in the countryside. The Council considers that the policy, when read alongside the wider Local Plan framework, provides an appropriate basis for assessing proposals and ensuring that impacts	Comment noted. No changes required.

accommodation should be subject to a viability assessment.	on the countryside and local amenity are taken into account. The retention of visitor accommodation is addressed through Policy EC8, which provides the relevant framework for assessing proposals involving the loss of tourism uses. The Council does not consider it necessary to duplicate those requirements within Policy EC7.	
Polegate Town Council Ensure that there will be no harm on highways safety or a severe impact on the immediate highways network. Avenues to attract visitors should always be explored but does have to have some control to avoid uncontrolled tourism issues.	The Council agrees that visitor accommodation and tourism development should not result in unacceptable impacts on highway safety or the operation of the local road network. Proposals will be assessed against relevant transport and highway policies of the Local Plan to ensure that access arrangements and traffic impacts are acceptable.	Comment noted. No changes required.
Rotherfield Parish Council The supporting text should go further to ensure that the visual impact will be an all-year-round consideration in the High Weald AONB. Seasonal occupancy may be used as an excuse to put caravans in a field during the summer months only.	The Council recognises the importance of ensuring that the visual impacts of visitor accommodation are appropriately considered throughout the year, particularly within the High Weald National Landscape. Proposals for caravans, camping and other forms of visitor accommodation will be assessed	Comment noted. No changes required.

	against relevant landscape and design policies, taking account of their effects on landscape character and visual amenity, including any seasonal impacts where relevant.	
Uckfield Town Council To promote tourism in Wealden, we definitely need more caravan and camping sites. The demand is already significant. This needs to have green tourism accreditation. It is important to retain existing locations and not lose them to housing and other non-employment uses.	Policy EC7 seeks to support sustainable visitor accommodation where it is appropriate to its location and does not result in unacceptable environmental, landscape or amenity impacts. The Council also supports the retention of existing tourism facilities where they continue to contribute to the visitor economy and aligns with the wider objective of promoting sustainable tourism. The achievement of green tourism accreditation and similar standards can provide additional benefits, but the Council does not consider it necessary to make this a specific policy requirement.	Comment noted. No changes required.
Willingdon Parish Council Limited visitor accommodation in our area	Policy EC7 seeks to support the provision of appropriate visitor accommodation that contributes to the local economy whilst ensuring that development is sustainable and does not adversely affect the environment, landscape or local communities. The Council's	Comment noted. No changes required.

	evidence base has informed the approach to tourism and visitor accommodation and the policy provides a framework for supporting suitable proposals where they accord with the wider objectives of the Local Plan.	
Local Residents	**WDC Response**	**Proposed Changes to Policy**
Supportive of the policy Restricting visitor accommodation to development boundaries is considered too restrictive and may limit tourism growth. Insufficient support for countryside-based accommodation, despite rural landscapes being a key attraction for visitors. Need for greater flexibility to allow visitor accommodation both within and outside development boundaries. Policy does not adequately address short-term holiday lets such as Airbnb. A register of visitor accommodation should include short-term lets. Potential future need for policy controls on Airbnb and short-term lets if they lead to significant loss of residential housing stock. Concerns about the suitability and visual impact of caravan sites, with suggestions they may be intrusive, unattractive, and unable to provide the quality of facilities visitors expect. Policy may not provide sufficiently strong protection for environmentally sensitive sites,	The policy seeks to support visitor accommodation both within and, where justified, outside development boundaries, whilst ensuring that proposals are appropriate to their location and comply with other relevant Local Plan policies. The Council acknowledges comments relating to short-term holiday lets, caravan and glamping sites, ecological impacts, protection of agricultural land and the need for greater flexibility for countryside-based accommodation. These matters are addressed through the wider Local Plan framework, including policies relating to tourism, the rural economy, biodiversity, landscape, agricultural land, housing and environmental protection.	Comment noted. No changes required.

including Ancient Woodland, reservoirs and wildlife habitats. Concern that camping and glamping developments could cause disturbance to birds and habitat deterioration, particularly around Bewl Water. Call for stronger policy wording to resist visitor accommodation in or near protected ecological areas. Need for explicit restrictions on permanent holiday lodge developments near sensitive wildlife and environmental sites. Insufficient recognition of the importance of protecting farmland and agricultural businesses. Concern that visitor accommodation development could lead to the loss of agricultural land, jobs and rural businesses. Potential negative impacts on the local economy if sustainable agricultural enterprises are displaced. Need to balance tourism growth with food production, rural employment, education opportunities and environmental protection.		
Other Comments	**WDC Response**	
None		

Policy EC8: The Retention of Sites in Economic or Tourism Use and Community Facilities

WDC Response to the Regulation 18 Consultations

Total: 70	Support: 65	Neutral: 3	Object: 2

Policy EC8: The Retention of Sites in Economic or Tourism Use and Commercial Community Facilities		
Statutory Consultees	**WDC Response**	**Proposed Changes to Policy**
None		
Neighbouring/Other Local Authorities	**WDC Response**	**Proposed Changes to Policy**
None		
Other Consultee Bodies	**WDC Response**	**Proposed Changes to Policy**
<u>Organisations with specific interest</u> **CPRE Sussex** Supportive of the policy It should be appreciated that use of this Policy to enable redevelopment of a previous visitor attraction could require a positive HRA	Comment of support noted. Where relevant, proposals will be subject to the requirements of the Habitats Regulations, including Habitats Regulations Assessment and any necessary mitigation measures. These requirements arise through separate legislation and apply irrespective of whether they are specifically referenced within Policy EC8. The Council therefore does not consider it necessary to duplicate these statutory requirements within the policy.	Comment of support noted. No changes required.

Residents Associations **The Working Group Against Over Development** Supportive of the policy It should be appreciated that use of this Policy to enable redevelopment of a previous visitor attraction could require a positive HRA	Comment of support noted. Where relevant, proposals will be subject to the requirements of the Habitats Regulations, including Habitats Regulations Assessment and any necessary mitigation measures. These requirements arise through separate legislation and apply irrespective of whether they are specifically referenced within Policy EC8. The Council therefore does not consider it necessary to duplicate these statutory requirements within the policy.	Comment of support noted. No changes required.
Village Concerns Supportive of the policy The asterisk in the policy needs to be explained	Comment of support noted. The asterisk has been removed from the amended policy.	Comment of support noted. The asterisk has been removed from the amended policy.
Parish/Town Councils	**WDC Response**	**Proposed Changes to Policy**
Arlington Parish Council **Crowborough and District Chamber of Commerce** **Heathfield & Waldron Parish Council** **Horam Parish Council** **Laughton Parish Council** **Rotherfield Parish Council** Supportive of the policy	Comment of support noted.	Comment of support noted. No changes required.
Mayfield and Five Ashes Parish Council No comment	Comment of noted.	Comment noted. No changes required.
Pevensey Parish Council Supportive of the policy	Policy EC8 is intended to provide a consistent approach to the retention of employment uses, tourism	Comment noted. No changes required.

This policy should not address economic uses, which should be a standalone policy. The policy should be strengthened in particular in relation to the requirement of a viability assessment. Existing use should be addressed separately Provided detailed wording amendment to the policy	facilities, attractions and visitor accommodation where similar considerations apply regarding loss of existing economic uses. The Council considers that a single policy provides a clear and effective framework for decision-making. Policy EC8 already requires robust evidence to demonstrate that an existing use is no longer financially viable and allows the Council to require independent review of submitted evidence where necessary. The Council considers that the policy provides an appropriate and proportionate approach.	
Polegate Town Council Supportive of the policy Any site that may be under threat of closure should be helped in some way.	Comment of support noted.	Comment of support noted. No changes required.
Uckfield Parish Council Supportive of the policy Asset of Community Value procedures should be referenced in this policy.	Comment of support noted. The designation and operation of Assets of Community Value are governed by separate legislation and processes outside the planning system. Policy EC8 is intended to provide a planning framework for assessing the loss of employment uses, tourism facilities, attractions and visitor accommodation. The Council does	Comment of support noted. No changes required.

	not consider it necessary to reference Asset of Community Value procedures within the policy, as these matters will continue to operate separately where relevant.	
Wartling Parish Council Footpath should be protected within the Plan as they are a visitor attraction.	The protection and enhancement of public rights of way are addressed through the wider policies of the Local Plan and relevant legislation. Policy EC8 is specifically concerned with the retention of employment uses, tourism facilities, attractions and visitor accommodation, and it is therefore not considered necessary to include specific provisions relating to footpaths within this policy.	Comment noted. No changes required.
Local Residents	**WDC Response**	**Proposed Changes to Policy**
The majority of residents are supportive of the policy with some objections The asterisk in the policy needs to be explained. Existing economic and tourism sites should be able to be updated Insufficient focus on the protection of farmland and employment Unsure changes are required for camping.	The policy seeks to safeguard employment uses, tourism facilities, attractions and visitor accommodation from unjustified loss whilst allowing proposals to be considered where robust evidence demonstrates that retention is no longer reasonable or viable. Existing economic and tourism sites may continue to be improved, modernised and redeveloped in accordance with the relevant policies of the Local Plan. Matters	Comment noted. No changes required.

	relating to agricultural land protection, camping uses and other forms of development are addressed through the wider policy framework.	
Other Comments	**WDC Response**	
None		

Town Centres

Policy TC1: District, Services and Local Centre Hierarchy and Town Centre First Principles

WDC Response to the Regulation 18 Consultation

Total: 85	Support: 74	Neutral: 7	Object: 4

Policy TC1: District, Services and Local Centre Hierarchy and 'Town Centre' First Principles		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
Network Rail • Supportive of the policy. • Development should be focused around the most sustainable locations to help in meeting the housing needs.	• Welcome the support.	No action required
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
Eastbourne Borough Council • Supportive of the policy. • Considerations should be given to the role of Eastbourne town centre and other district centres within Eastbourne Borough and the impact they have on the Functional Economic Market Area. • Impacts on viability and vitality of out of centre retail development in the south of the district should be considered.	• Welcome the support • Supporting text amended to refer to the influence of sub-regional shopping centres located outside the plan area. Those areas being outside the local plan area, the proposed policies will not apply to them. • Out of centre retail development is subject the sequential test set out in the NPPF	No change to policy but strengthen supporting text

Other Consultee Bodies	WDC Response	Changes made to policy/chapter
Developers and land agents **Clarity Ecoworks** • Supportive of the policy.	• Welcome the support.	No action required
Organisations with specific interest **CPRE Sussex** • Supportive of the policy. • The policy should include a statement containing which elements of a town centre it is seeking to apply to, employment and/or residential.	• Welcome the support. • Town centre uses are defined within national policy and within the glossary of the Plan.	No change proposed to policy but additional supporting text will be added to clarify the matter.
Crowborough and District Chamber of Commerce • Supportive of the policy.	• Welcome the support.	No action required
Transport Future East Sussex • Supportive of the policy.	• Welcome the support.	No action required
Uckfield Chamber of Commerce • Supportive of the policy.	• Welcome the support.	No action required
Resident Associations **Village Concerns** • Supportive of the policy.	• Welcome the support.	No action required

The Working Group Against Over Development • Supportive of the policy. • The policy should include a statement containing which elements of a town centre it is seeking to apply to, employment and/or residential.	• Welcome the support. • Town centre uses are defined within national policy and within the glossary of the Plan.	No change proposed to policy but additional supporting text will be added to clarify the matter.
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Crowborough Parish Council • The Council is keen to explore the reinvigoration of the high street.	• Comment noted	No action required
Heathfield and Waldron Parish Council • Supportive of the policy. • Level of retail provision is a useful indicator or what each centre offers.	• Welcome the support. • Comment noted	No action required
Hailsham Town Council • Town centres uses are not clearly specified. • Proactive approach is required to manage proliferation and impacts of some uses.	• Town centre uses are defined within national policy and within the glossary of the Plan.	No change proposed to the policy but additional supporting text will be added to clarify the matter.
Horam Parish Council • Supportive of the policy.	• Welcome the support.	No action required
Laughton Parish Council • Supportive of the policy.	• Welcome the support.	No action required
Mayfield and Five Ashes Parish Council • Supportive of the policy.	• Welcome the support.	No action required

Isfield Parish Council • Supportive of the policy. • Definition of town centre uses should be in line with national policy.	• Welcome the support. • The Plan relies on the definition of main town centre uses included within the NPPF.	No change proposed to policy but additional supporting text will be added to clarify the matter.
Pevensey Parish Council • Not supportive of the policy. • Agree with the identification of Pevensey as a service centre • Criteria need to be added to the policy to protect against the loss of visitor accommodation.	• Comment noted • Visitor accommodation is identified as one of the main town centre uses within the NPPF. Protection is afforded to visitor accommodation within proposed policy EC7. The Plan should be read as a whole and alongside national policy. They will be applied to all relevant proposals.	No action required
Polegate Town Council • Supportive of the policy. • To retain town centres, there should be EV charging point in town centres and Wealden run cark parks in Polegate.	• Welcome the support.	No action required
Rotherfield Parish Council • Supportive of the policy.	• Welcome the support.	No action required
Uckfield Parish Council • Supportive of the policy.	• Welcome the support.	No action required
Wartling Parish Council • Study needs to be undertaken of what will be needed from town centres in the future before improving existing town centres.	• The Council has developed a robust evidence base to support the viability and vitality of town centres across the District through the Plan period.	No action required

Local Residents	WDC Response	Changes made to policy/chapter
• Supportive of policy • Policy needs to be clearer by defining town centre uses in accordance with national policy. • Retail frontages should be encouraged to be converted to other town centre uses or residential. • Policy is too prescriptive as it will not support change of use of commercial ground floor premises. • Policy needs to be relaxed in order to meet the housing need. • Lack of consistency in applying town centre policies. • Good design, accessibility and sustainable materials should be prioritised over keeping the character of new buildings in keeping with existing buildings. • Lack of evidence to support the settlement hierarchy • Development should be shared by smaller villages and hierarchy should be more flexible. • Policies map for Horam Village Centre is incorrect, and the proposed boundary should align with the neighbourhood plan. • Horam should not be included as a Local Centre as it is a rural settlement and doesn't have the facilities of the other settlements in the category. • Horam does not have the same services and facilities as others designated as a local centre.	• Welcome the support. • Town centre uses are defined within national policy and within the glossary of the Plan. • The identification of town centre boundaries is a key tool to help shape and support town centres. Suitably located complementary uses such as residential development can contribute to the viability of town centres. • Permitted development rights remains in place within town centre allowing change of use to residential in some circumstances, which this policy cannot override. • Planning applications are determined in accordance with the development plan, unless material considerations indicate otherwise. They are however equally considered on their merits evaluating the benefits and harms of a proposal. • The assessment of retail centres within the hierarchy is based on their offer in relation to town centre uses, as opposed to the settlement hierarchy, which is based on a more holistic assessment of services, facilities and connectivity to other parts of the district.	No change proposed to policy but additional supporting text will be added to clarify the matter.

• Polegate and Willingdon are treated as one entity and should be tier one on the hierarchy.		

Policy TC2: Sequential and Local Impact Test

WDC Response to the Regulation 18 Consultation

Total: 26	Support: 22	Neutral: 3	Object: 1

Policy TC2: Sequential and Local Impact Test		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
None	n/a	n/a
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
None	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Developers and land agents **Aldi Stores Limited** • Suggests amending the policy to strengthen the sequential approach, requiring applicants to demonstrate flexibility in development format and scale to prioritise suitable town centre and edge-of-centre sites before considering out-of-centre locations. Also recommends extending impact assessment requirements to retail and leisure	• The proposed changes are not supported by appropriate evidence and contradict the findings of the Welden Town Centre Study	No action required

developments over 2,500 sq m located outside defined centres.		
Clarity Ecoworks • Supportive of the policy.	• Welcome the support.	No action required
Hertfordshire Holdings • The policy should be combined with policy SS	• Comment noted although not considered appropriate.	No action required
Resident Association **Village Concerns** • Supportive of the policy. • Agree with the proposed threshold for retail development	• Welcome the support. • Comment noted	No action required
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Crowborough Town Council • Supportive of the policy.	• Welcome the support.	No action required
Horam Parish Council • Supportive of the policy. • For Local Centre, impact assessment should be introduced from 25sqm to protect the viability of existing shops in the High Street.	• Welcome the support but this is not considered appropriate or feasible.	
Heathfield and Waldron Parish Council • Supportive of the policy. • All development on the edge of or out of town should be subject to an impact assessment.	• Welcome the support. • Such approach is not supported by evidence.	No action required

Mayfield and Five Ashes Parish Council • Supportive of the policy.	Welcome the support.	No action required
Pevensey Parish Council • Object to the policy.	• Position noted	No action required
Polegate Town Council • Supportive of the policy.	• Welcome the support.	No action required
Rotherfield Parish Council • Supportive of the policy.	• Welcome the support.	No action required
Uckfield Town Council • Supportive of the policy.	• Welcome the support.	No action required
Local Residents	**WDC Response**	**Changes made to policy/chapter**
• Supportive of the policy. • For Local Centre, impact assessment should be introduced from 25sqm to protect the viability of existing shops in the High Street. • The Local Impact Tests should ensure that shops stay in towns, that villages have nearby services and that they are located in reachable locations. • Ground floor conversions to residential should be supported in redundant commercial buildings in town centres to improve density and efficient of land use.	• Welcome the support • Such approach is not supported by evidence. • Comment noted. • The identification of town centre boundaries is a key tool to help shape and support town centres. Suitably located complementary uses such as residential development can contribute to the viability of town centres.	No action required

Policy TC3: Primary Shopping Area

WDC Response to the Regulation 18 Consultations

Total: 31	Support: 24	Neutral: 5	Object: 2

Policy TC3: Primary Shopping Areas		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
None	n/a	n/a
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
None	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Organisations with specific interest **Crowborough and District Chamber of Commerce** • Supportive of the policy.	• • Welcome the support	No action required
Resident Associations **Village Concern** • Supportive of the policy.	• Welcome the support	No action required
Willingdon Residents' Association • Willingdon is well served with small businesses catering for most people's need.	• Comment noted	No action required
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**

Hailsham Town Council • The policy fails to define town centres uses. • Calls for a proactive approach to managing betting shops, hot food takeaways and vape retailers, citing concerns about their impacts on town centre character, economic vitality, public health and community wellbeing.	• Town centre uses are defined within national policy and within the glossary of the Plan. • Uses having a detrimental impact on Primary Shopping Areas would be resisted.	No action required
Heathfield and Waldron Parish Council • Supportive of the policy.	• Welcome the support	No action required
Horam Parish Council • Supportive of the policy.	• Welcome the support	No action required
Mayfield and Five Ashes Parish Council • Supportive of the policy.	• Welcome the support	No action required
Pevensey Parish Council • Object to the policy. • The policy should resist the loss of tourism use including visitor accommodation in town centres. • Made suggestion to the town centre boundary for Pevensey Bay to include vensey Bay Baptist Church and St Wilfrid's Church.	• Visitor accommodation is identified as one of the main town centres uses within the NPPF. Protection is afforded to visitor accommodation within proposed policy EC7. The Plan should be read as a whole and alongside national policy. • A key test to be included within a village centre boundary is whether	No action required

	the land/building is defined as a Main Town Centre Use in the NPPF and churches are not included within this definition.	
Polegate Town Council • Supportive of the policy. • Business rates should be reduced.	• Welcome the support • The matter of business rates goes beyond the scope of the local plan.	No action required
Rotherfield Parish Council • Supportive of the policy.	• Welcome the support	No action required
Uckfield Town Council • Supportive of the policy. • Highlights the importance of adequate infrastructure, particularly parking, in supporting the vitality and viability of Primary Shopping Areas. Raises concerns that existing parking pressures in Uckfield town centre will worsen as housing growth and demand for local services increase.	• Welcome the support • The Council's priority is to develop a sustainable local plan strategy which will address the climate crisis and deliver a carbon neutral district through the increased use of inclusive and sustainable travel modes which would limit the pressure on parking provision and support the adoption of vehicle with cleaner fuels.	No action required
Willingdon and Jevington Parish Council • Supportive of the policy.	• Welcome the support	No action required

Local Residents	WDC Response	Changes made to policy/chapter
• Supportive of the policy • The policy should include a provision to resist substantial out of town retail development. Small retail provision in rural areas should also be encouraged. • Empty shops could be used for the required ½ bedroom and 'affordable' flats and housing. Town centres should have a mix of residential and retail. • Shopping areas should be either pedestrianised or limited/speed restricted vehicular access. • Emphasis must be placed on providing adequate parking to enable people to park to shop. • The proliferation of charity shops should be controlled, if possible.	• Welcome the support • Out of town retails is addressed under policy TC2. The Plan should be read as a whole and alongside national policy. • Retaining active retail frontages in primary shopping areas, while allowing residential uses on upper floors is important • Sustainable travel as a key objective, with parking and transport infrastructure being addressed through ongoing engagement with transport providers. • Charity shops cannot be controlled through planning policy and can help reduce vacancies and support town centre vitality.	No action required

Policy TC4: Garden Centres

WDC Response to the Regulation 18 Consultations

Total: 32	Support: 27	Neutral: 1	Object: 4

Policy TC4: Garden Centres		
Statutory Consultees	**WDC Response**	**Changes made to policy/chapter**
None	n/a	n/a
Neighbouring/Other Local Authorities	**WDC Response**	**Changes made to policy/chapter**
None	n/a	n/a
Other Consultee Bodies	**WDC Response**	**Changes made to policy/chapter**
Organisations with specific interest • **CPRE Sussex** • Supports the policy's intent but considers the wording too permissive. Recommends limiting non-garden-centre retail sales to no more than 10% of total sales by value, with clear definitions to prevent unrelated products, such as outdoor clothing, being classified as garden centre goods.	• Welcome the support • The scope of the proposed policy relates to proposed extensions of existing garden centres. The proposed policy sets out clear rules whilst allowing sufficient flexibility.	No action required
Resident Associations **The Working Group Against Over Development**	• Welcome the support. • The scope of the proposed policy relates to proposed extensions of existing garden centres. The	No action required

• Supports the policy's intent but considers the wording too permissive. Recommends limiting non-garden-centre retail sales to no more than 10% of total sales by value, with clear definitions to prevent unrelated products, such as outdoor clothing, being classified as garden centre goods.	proposed policy sets out clear rules whilst allowing sufficient flexibility.	
Village Concerns • Supportive of the policy.	• Welcome the support.	No action required
Willingdon Residents' Association • Supportive of the policy.	• Welcome the support.	No action required
Parish/Town Councils	**WDC Response**	**Changes made to policy/chapter**
Chiddingly Parish Council • Supportive of the policy.	• Welcome the support.	No action required
Heathfield and Waldron Parish Council • Supportive of the policy.	• Welcome the support.	No action required
Horam Parish Council • Objects to the policy. • Garden Centres should sell garden/horticultural products and in certain circumstances have a cafe.	• The proposed policy sets out clear rules whilst allowing sufficient flexibility. • A policy setting out the systematic use of planning condition would not be compliant with planning guidance.	No action required

Mayfield and Five Ashes Parish Council • Supportive of the policy.	• Welcome the support.	• No action required
Polegate Town Council • Supportive of the policy	• Welcome the support.	• No action required
Rotherfield Parish Council • Supportive of the policy. • Note the use of planning condition on a case-by-case basis although this should be applied flexibility as Garden Centres can be visitor destination and are effective employment generators.	• Welcome the support • Comment noted	• No action required
Uckfield Parish Council • Supportive of the policy.	• Welcome the support.	No action required
Local Residents	**WDC Response**	**Changes made to policy/chapter**
Supportive of the policy. Supports retaining the primary garden centre function of garden centres, with ancillary uses such as cafés where appropriate. Opposes their evolution into out-of-centre retail parks, recommending that retail floorspace remains focused on horticultural products, with support for farm shops, rural crafts and local growers.	Welcome the support The proposed policy sets out clear rules whilst allowing sufficient flexibility. A policy setting out the systematic use of planning condition would not be compliant with planning guidance. Other areas of the Plan set out where residential development would be	No action required

Also seeks resistance to residential conversion and concerns that garden centres could become a route to future housing development.	supported. The Plan should be read as a whole and alongside national policy. Proposals for the provision of new garden centres will be considered against other policies within the Plan, including those within the Town Centres chapter.	

Interim Infrastructure Delivery Plan (IDP) – Regulations 18 (1) and (2)

Wealden Local Plan – Regulation 18 Consultation Responses

Total: 82	Support: 55	Neutral: 18	Object: 9

Interim Infrastructure Delivery Plan (IDP) – Regulations 18 (1) and (2)		
Statutory Consultees Regulation 18 (1)	**WDC Response**	**Proposed Changes to IDP**
• No comments.	n/a	n/a
Statutory Consultees Regulation 18 (2)	**WDC Response**	**Proposed Changes to IDP**
National Highways • Supports the IDS as a key evidence base for infrastructure delivery and notes progress on the A22/A27 Golden Jubilee Roundabout scheme. • The A27 Lewes to Polegate scheme is not funded through RIS3 and should not be assumed to proceed, with alternative funding mechanisms identified where strategic road improvements are required. • Any SRN mitigation required by development should be developer-funded and delivered in accordance with DMRB standards and National Highways approval. • Transport mitigation should be phased alongside growth, with future IDS	• The Council welcomes National Highways' support for the IDS and has updated it to reflect progress on the A22/A27 Golden Jubilee Roundabout scheme. • The Council notes that the A27 Lewes to Polegate scheme is not included in RIS3 and will continue working with partners to identify alternative funding and delivery mechanisms for necessary highway infrastructure. • The Council recognises National Highways' position that SRN mitigation should be developer-funded, delivered in accordance with DMRB standards, and approved by National Highways. • The IDS has been updated to include indicative infrastructure delivery timescales, helping align transport infrastructure with planned growth. • Continued engagement with National Highways on infrastructure delivery, transport mitigation, highway safety, and design is welcomed.	The IDS has been updated to include indicative delivery timescales for infrastructure projects.

updates including clearer infrastructure phasing. • National Highways supports ongoing engagement on infrastructure planning, monitoring, transport mitigation, and design standards.		
Network Rail • Notes the inclusion of specific rail projects within the IDP. • Notes that while funding is not currently available, securing developer contributions and third-party funding would strengthen the case for future investment. • Notes that the Council should include a mechanism within the Local Plan to secure contributions towards public transport, including rail infrastructure. • Notes that improvements at Frant, Berwick and Wadhurst stations may be required to mitigate increased passenger demand arising from planned growth.	• The Council notes its recommendation to secure developer contributions towards rail infrastructure. • The Local Plan includes policies to secure developer contributions where they are necessary to mitigate the impacts of development and meet the relevant statutory tests. • The Council will continue to work with Network Rail and other infrastructure providers to identify infrastructure requirements arising from growth and opportunities to secure funding for improvements, including at Frant, Berwick and Wadhurst stations where justified by development impacts.	No action required.
Southern Water • Need to deliver additional infrastructure to serve new/existing customers or meet tighter environmental standards**.**	• Comments noted.	No action required.

• Wastewater treatment standards are set by the Environment Agency through environmental permits; drinking water quality standards are set by the Drinking Water Inspectorate (DWI).		
Neighbouring/Other Local Authorities Regulation 18 (1)	**WDC Response**	**Proposed Changes to IDP**
East Sussex County Council (ESCC) • The information in the IDP was provided for the Regulation 18 Draft Local Plan and based on early testing of the likely impacts of the initial housing growth strategy. • The IDP information will be subject to further testing, likely in autumn 2024, to provide more quantifiable area-by-area feedback on education infrastructure needs.	• The Interim IDP was prepared using the evidence available at Regulation 18 and has since been updated through ongoing engagement with infrastructure providers, service delivery organisations and key stakeholders. • The IDP and accompanying IDS reflect the latest available evidence on infrastructure requirements, capacity, delivery mechanisms and funding opportunities and will continue to be reviewed and updated as further evidence emerges.	Overall, the IDP has been comprehensively reviewed and updated to reflect ongoing engagement with infrastructure providers, service delivery organisations, statutory consultees and other key stakeholders. Both the IDP and its associated IDS reflects the most up-to-date evidence available, incorporating stakeholder feedback and updated information on infrastructure requirements, capacity, delivery mechanisms and funding arrangements.
Tunbridge Wells Borough Council (TWBC) • TWBC raise concerns that development near Royal Tunbridge Wells could place additional pressure on local infrastructure, services, and facilities. • It seeks clearer assessment of cross-boundary impacts, including	• The Council has engaged with infrastructure providers, neighbouring authorities, and key stakeholders in preparing the IDP, which reflects the latest evidence on infrastructure needs and delivery. • The IDP, transport modelling, and Sustainability Appraisal consider cross-boundary impacts on education, healthcare, transport, water supply, sports, and community infrastructure.	The IDP has been reviewed and updated following the Council's engagement with infrastructure providers and key stakeholders and reflects the most up-to-date evidence available on cross-boundary infrastructure matters such as education, healthcare,

engagement with relevant service providers. • Concerns relate to education, sports facilities, healthcare capacity, and water supply, particularly in areas already experiencing infrastructure pressures. • TWBC emphasises the need for appropriate infrastructure upgrades to support planned growth. •	• Education, healthcare, sports, and utility infrastructure requirements are reflected in the IDP and will continue to be monitored and reviewed. • The IDP recognises the need for infrastructure investment, particularly in areas of water stress, and will be updated as new evidence emerges. • The Council is satisfied that the infrastructure required to support planned growth can be delivered, with site-specific mitigation secured through development management and ongoing collaboration with providers and neighbouring authorities.	water supply, community and sports facilities.
Neighbouring/Other Local Authorities Regulation 18 (2)	**WDC Response**	**Proposed Changes to IDP**
East Sussex County Council (ESCC) <u>Cultural Infrastructure</u> • Notes that the IDP should recognise the shortage of museum/archive capacity for archaeological archives generated through development. • Notes that additional museum or public depository capacity is needed to enable developers to meet NPPF requirements for archive deposition. This is a county-wide. <u>Flood Risk Management</u>	<u>Cultural Infrastructure</u> • The Council acknowledges ESCC's concerns regarding museum and archive capacity for archaeological material and has appropriately reflected this county-wide requirement within the IDP. <u>Flood Risk Management</u> • The Council supports the use of nature-based flood management measures where supported by evidence and considers they can make an important contribution to flood resilience and the delivery of LNRS objectives. This approach is reflected in the wider Local Plan strategy and its policies.	The IDP has been updated to reflect ongoing engagement with infrastructure providers, key stakeholders and emerging evidence. As a result of engagement with ESCC, Cultural Infrastructure and Libraries have now been included within the IDP.

• Requires that nature-based flood management solutions should be prioritised where appropriate to support long-term flood resilience and delivery of the LNRS. <u>Green Infrastructure and Nature Recovery</u> • Notes that wildlife areas should be identified across the district, not just in Danehill, to support health, wellbeing and nature recovery. • Notes that infrastructure to support landscape-scale deer management (e.g. local venison processing facilities) should be recognised as it would contribute to habitat restoration, LNRS objectives, the High Weald National Landscape, and local economic benefits. <u>Education</u> • Falling birth rates may reduce short-term primary school demand, but housing growth is expected to create localised education pressures.	<u>Green Infrastructure and Nature Recovery</u> • The Council supports the use of nature-based flood management measures where supported by evidence and considers they can make an important contribution to flood resilience and the delivery of LNRS objectives. This approach is reflected in the wider Local Plan strategy and its policies. • The Council supports biodiversity enhancement, habitat restoration and wider green infrastructure initiatives where these contribute to nature recovery, landscape objectives, health and wellbeing, and wider environmental outcomes. <u>Education</u> • The Council notes ESCC's assessment of future education needs and recognises that planned growth is likely to generate localised demand for primary, secondary, early years and SEND provision. • These requirements have informed the updated IDP and will continue to guide infrastructure planning, site masterplanning and developer contribution discussions. • The Council will continue to work with ESCC to monitor pupil forecasts, identify future	

• New or expanded primary schools, additional early years provision, and increased secondary school capacity are likely to be required in several growth areas. • Demand for SEND provision is expected to increase significantly and should be reflected in infrastructure planning. • Education land and developer contributions should be prioritised where needed to mitigate the impacts of growth. <u>Libraries</u> • Notes that library services will need to respond to increased demand arising from planned growth. • Suggests that library provision should continue to be recognised as infrastructure requiring support through development contributions. <u>General comments</u> • Will continue to review demographic forecasts and infrastructure requirements as further evidence becomes available and future updates	infrastructure requirements and secure appropriate land and financial contributions where necessary. <u>Libraries</u> • The Council recognises libraries as an important community infrastructure and notes the potential role of developer contributions in supporting future provision where justified. <u>General comments</u> • The IDP is a living document, and the Council will continue to review and update it alongside evidence from infrastructure providers, including demographic forecasts, education planning evidence and other service requirements as they evolve over the plan period.	

to the School Organisation Plan and IDP are prepared.		
Tunbridge Wells Borough Council (TWBC) • TWBC reiterates concerns about the need for ongoing cross-boundary engagement on education, healthcare, and other infrastructure. • Concerns remain about how growth on the Royal Tunbridge Wells fringe will be supported by education, healthcare, and highway infrastructure. • Up to 657 dwellings and potential option sites could increase pressure on services and infrastructure, with clarification sought on delivery, funding, and responsibilities. • Concerns are also raised about impacts on the Kent highway network from increased cross-boundary travel. • TWBC requests continued engagement and opportunities to review updated IDP evidence as it emerges. • .	• The Council has engaged with TWBC, KCC, NHS bodies, infrastructure providers and neighbouring authorities in preparing the IDP. • The IDP and supporting evidence consider the cross-boundary impacts of growth on education, healthcare, transport and other infrastructure, including around Royal Tunbridge Wells. • Education and healthcare requirements identified through engagement with providers are reflected in the IDP and will continue to be monitored and updated. • Infrastructure needs, delivery mechanisms and potential transport impacts, including cross-boundary travel into Kent, have been assessed through the evidence base and ongoing engagement. • The Council welcomes continued engagement with TWBC, KCC and infrastructure providers and is satisfied that the infrastructure required to support planned growth can be delivered.	The IDP has been revised to reflect the most up-to-date evidence available, incorporating stakeholder feedback and updated information on infrastructure requirements, capacity, delivery mechanisms and funding arrangements obtained through ongoing engagement with infrastructure providers and key stakeholders.
Eastbourne Borough Council • Emphasises the need for the Local Plan to fully assess the cross-boundary infrastructure impacts of growth in south Wealden.	• The Council has continued to engage with EBC, Southern Water and other stakeholders on the infrastructure implications of growth in south Wealden. • A joint Water Cycle Study (Phsse 1) has been undertaken to assess wastewater capacity constraints and infrastructure requirements.	The IDP has been updated to reflect the outcomes of ongoing engagement with infrastructure providers and key stakeholders, including Southern Water,

• Concerns remain over wastewater capacity constraints, particularly within the sewer network and at Eastbourne WTW. • EBC highlights the ongoing joint Water Cycle Study with WDC and considers development should, where feasible, connect to alternative wastewater treatment works. • It also seeks stronger and more consistent recognition of wastewater infrastructure requirements and risks within site allocation policies, including WES5 (Sharnfold Farm, Stone Cross).	• The IDP identifies wastewater network and treatment capacity upgrades as key infrastructure needs and will be updated as further evidence emerges. • The Council recognises the need to address both site-specific and cumulative cross-boundary impacts, including those affecting Eastbourne. • Strategic infrastructure requirements are set out in the Local Plan and IDS, with detailed utility matters addressed through the planning application process. • The Council will continue working collaboratively with EBC and other stakeholders to ensure infrastructure is planned and delivered alongside growth.	alongside emerging evidence from the Water Cycle Study.
Lewes District Council (LDC) • Considers the IDP adequate but seeks further detail on infrastructure requirements for LH1 (Owlsbury Farm), Ringmer and Broyle Side. • Requests continued engagement on growth options with cross-boundary implications and early access to highway modelling, particularly for the A22, A272, A26 and B2192 corridors. • Concerns are raised that growth proposals, including expansion of Ashdown Business Centre, could increase HGV movements and place additional pressure on the wider transport network.	• Site-specific infrastructure requirements will be identified through Local Plan policies and the planning application process in consultation with relevant providers. • The Council welcomes continued engagement with Lewes District Council and has updated the IDP to reflect infrastructure needs arising from planned growth. • Cross-boundary and cumulative transport impacts, including on the A22, A272, A26 and related corridors, continue to be considered through transport modelling and be monitored with partner authorities. • Potential transport impacts from strategic employment growth, including Ashdown Business Centre, have also been assessed through the evidence base and infrastructure planning process.	The IDP has been updated to reflect the outcomes of ongoing engagement with infrastructure providers and key stakeholders, alongside emerging evidence.

Other Consultee Bodies Regulation 18 (1)	WDC Response	Proposed Changes to IDP
Developers and land agents **Grosvenor Property UK Limited** • Suggests that Hailsham North and Hailsham South Wastewater Treatment Works (WTW) capacity will not constrain development because Southern Water has a statutory obligation to provide infrastructure. • Considers that proposed development at North West Hailsham would address key district challenges identified in the IDP relating to transport and connectivity.	• Wastewater infrastructure capacity and delivery requirements have been considered through the Local Plan evidence base, including the Water Cycle Study. The Council has engaged with Southern Water and other relevant stakeholders to inform infrastructure planning and will continue to work collaboratively with infrastructure providers to monitor wastewater treatment and network capacity, identify infrastructure requirements, and support the timely delivery of improvements needed to accommodate planned growth. • The proposed development at North West Hailsham has been considered through the site assessment process as well as the wider evidence base supporting the Local Plan.	No further changes required.
Organisations with specific interests **Village Concerns** • Question the achievability of the assumed 5% modal shift in rural areas and seeks supporting evidence. • Concerns raised about traffic impacts on rural roads, public transport accessibility, bus service quality, A22 dualling and limited opportunities for modal shift, particularly in East Hoathly. • The response highlights walking and cycling safety issues, the need for cycle	• The transport assumptions, including modal shift, have been robustly tested through the transport evidence base and modelling. • References to TfSE Project N18 and comments on rural roads, bus services, public transport accessibility, and opportunities for modal shift will be considered through ongoing transport planning and future IDP/IDS reviews. • The Council recognises the importance of safe walking and cycling infrastructure and will continue to work with partners to identify improvements where supported by evidence. • Travel Plan requirements and monitoring will be addressed through the planning application process, with measures tailored to the scale and nature of development.	No further changes required.

infrastructure, and stronger Travel Plan monitoring and transparency. • Concerns are also raised about the omission of East Hoathly sports facilities from the IDP and the delivery risks associated with critical infrastructure needed to support growth.	• Comments on East Hoathly recreation facilities and infrastructure delivery risks are noted; the IDP will continue to be reviewed and updated as evidence, delivery programmes, and infrastructure requirements evolve. • The Council is satisfied that the infrastructure needed to support planned growth can be delivered, with site-specific mitigation secured through development management and ongoing engagement with infrastructure providers.	
NHS Property Services • Stated that adequate healthcare infrastructure is critical to sustainable development. • Suggested that a sound IDP must include sufficient detail on healthcare infrastructure required to support growth. • Emphasised the need for planning obligations and CIL capital allocation processes to support delivery of required healthcare infrastructure. • Recognised the Council's engagement with the ICB to date and recommended ongoing engagement as the Interim IDP and future IDPs are updated.	• The Council recognises the importance of delivering sufficient healthcare infrastructure to support planned growth. • Ongoing engagement with NHS Sussex ICB, NHS Property Services and other healthcare providers has informed the IDP and will continue throughout the plan period. • Healthcare requirements are reflected in the updated IDP and will be monitored and reviewed, with delivery supported through appropriate funding mechanisms, including planning obligations and CIL where applicable. • The Council welcomes continued collaboration with healthcare partners to ensure infrastructure provision keeps pace with growth and emerging evidence. •	The health and social care section of the IDP and IDS have been updated where further evidence identifies additional infrastructure requirements, delivery mechanisms or funding needs.
Uckfield Chamber of Commerce • Supports the Interim IDP, noting that it must remain flexible and work alongside development in the area.	• Support for the Interim IDP is noted. The IDP remains a live document and will be updated as new evidence and delivery information evolves. • Transport connectivity is considered as a key infrastructure matter in Local Plan.	No change is proposed.

• Recognises delivery challenges but considered that suitable transport infrastructure for improved connectivity should be a priority.		
Other Consultee Bodies Regulation 18 (2)	**WDC Response**	**Proposed Changes to IDP**
Organisations with specific interests **Green Weald Alliance (GWA)** **Infrastructure Evidence and Delivery** • Questions whether growth in Frant Parish is supported by a sufficiently robust and up-to-date infrastructure evidence base. • The IDS to considered indicative, with uncertainty around infrastructure costs, funding, delivery and risk. • Raises concerns that insufficient evidence demonstrate that infrastructure can be delivered within the first 5-10 years of the plan period. • Proposed growth inconsistent with 20-minute neighbourhood objectives due to existing sustainable transport limitations. **Active Travel** • No specific, costed active travel schemes have been identified for	**Infrastructure Evidence and Delivery** • The IDP has been updated since Regulation 18 and reflects the latest information from infrastructure providers and stakeholders. • As a living document, the IDS will continue to be reviewed and updated as further evidence on infrastructure requirements, costs, funding and delivery emerges. • The Council is satisfied that the infrastructure needed to support planned growth can be delivered, with detailed requirements, phasing and mitigation addressed through the planning application process and ongoing engagement with infrastructure providers. • The suitability of proposed allocations, including access to services and facilities, has been assessed through the site assessment process and supporting evidence base. **Active Travel** • The IDS identifies costed active travel projects where schemes have been proposed and sufficient information is available from infrastructure providers and delivery partners. Site-specific active travel measures required to support individual	No further changes required.

Bayham Road, Frant Road or the wider south Tunbridge Wells area. • Identified active travel projects are either district-wide or focused elsewhere and are not directly linked to proposed allocations. • Highlights existing deficiencies in walking and cycling connectivity, including limited pedestrian access to some sites. • Questions how sustainable travel infrastructure will be delivered to support planned growth. **Public Transport** • Notes that the IDS does not identify strategic public transport improvements serving Frant Parish or areas south of Tunbridge Wells. • Considers proposed improvements at Abergavenny Arms and Frant Station insufficient to support the scale of growth proposed. • Raises concerns that there is limited evidence demonstrating how public transport infrastructure and services will be enhanced. **Education**	allocations, including in the Frant area, will be determined through the planning application process and detailed transport assessments. • The Council will continue to work with ESCC, KCC and other stakeholders to identify active travel improvements. • Active travel infrastructure has been considered through the site assessment process, transport evidence base and infrastructure planning process. • Existing walking and cycling constraints have informed the assessment of sites and potential mitigation measures. **Public Transport** • Public transport accessibility has been considered through the transport evidence base and site assessment process. • The IDS identifies strategic transport and connectivity improvements across the district, while site-specific public transport improvements will be considered through detailed masterplanning and the development management process. • The Council will continue to work with transport providers, ESCC and KCC to identify opportunities to improve sustainable transport connectivity where supported by evidence. **Education** • The Council has worked closely with East Sussex County Council and Kent County Council to identify education infrastructure requirements arising from planned growth. These requirements are reflected	

• Notes that additional primary school capacity is identified but relies on a feasibility study for the expansion of Frant CE Primary School. • Highlights that the project is identified as essential infrastructure with high delivery risk and uncertain costs. • Raises concerns regarding reliance on education provision within Tunbridge Wells and the lack of clarity regarding cross-boundary delivery arrangements. **<u>Healthcare</u>** • Notes that additional clinical capacity is identified for the Frant and Wadhurst area but considers costs, funding arrangements and delivery mechanisms remain uncertain. • Questions how the required healthcare infrastructure will be secured and delivered.	within the IDP and will continue to be reviewed as evidence evolves. • The Council acknowledges that future education provision in the Frant area is subject to further assessment by the relevant education authorities. Infrastructure requirements, delivery mechanisms and funding arrangements will continue to be developed through ongoing engagement with education providers. • Cross-boundary education impacts have been considered through the Duty to Cooperate process and ongoing engagement with neighbouring authorities. **<u>Healthcare</u>** • Healthcare infrastructure requirements identified through engagement with NHS bodies and healthcare providers are reflected in the IDP. • The Council recognises that healthcare delivery arrangements, funding mechanisms and infrastructure requirements will continue to evolve and will be reviewed and updated through ongoing engagement with healthcare providers and future IDP updates. • Site-specific healthcare mitigation requirements will be considered through the development management process where necessary.	
Cochrane Strategic • Notes that the IDS and East Sussex LTP4 identify a range of transport improvements relevant to North West Hailsham, including A22 corridor	• The Council notes the support for the transport and infrastructure projects identified within the IDS and East Sussex Local Transport Plan 4. • The Council acknowledges the importance of A22 corridor improvements, bus service enhancements, mobility hubs and active travel infrastructure in	No further changes required.

junction improvements, the A22 Hailsham to Uckfield MRN scheme, mobility hubs, bus priority measures, enhanced bus services and active travel infrastructure. • Considers these schemes capable of significantly improving sustainable transport connectivity and supporting development at North West Hailsham. • Argues that highway improvements, enhanced bus services, mobility hubs and active travel infrastructure would support modal shift and help accommodate growth-related traffic. • References BSIP2 proposals, including enhanced Hailsham-Polegate-Eastbourne services, a North Hailsham mobility hub, further corridor-based bus improvements, potential night bus services and integrated mobility hubs. • Considers that development at North West Hailsham could help facilitate and fund transport improvements.	supporting sustainable growth. These projects have informed the transport evidence base and infrastructure planning process. • The role of strategic transport investment in facilitating modal shift and managing development-related travel demand has been considered through transport modelling and the wider evidence base supporting the Local Plan. • The Council notes the relevance of the Bus Service Improvement Plan (BSIP) and other sustainable transport initiatives in improving connectivity and supporting planned growth. • The potential for strategic development to contribute towards infrastructure delivery through developer contributions and partnership working is recognised and has been considered through the Local Plan, viability evidence and infrastructure planning processes. Ongoing infrastructure planning and monitoring will continue to inform the delivery and phasing of transport improvements required to support planned development.	
Parish/Town Councils Regulation 18 (1)	**WDC Response**	**Proposed Changes to IDP**
Pevensey Parish Council • Raises concerns about the impact of additional development on the transport network, education and health services, and community facilities.	• The Council notes concerns about the impacts of planned growth on transport, education, healthcare, and community infrastructure, which have been considered through the Local Plan evidence base, transport modelling, engagement with infrastructure providers, and preparation of the IDP.	No action required.

• Suggests that cumulative development impacts should be considered so that the total infrastructure impact in an area is understood.	• The IDP identifies infrastructure requirements, delivery priorities, and cumulative impacts arising from planned growth. • As a living document, the IDP will continue to be monitored and updated to reflect emerging evidence, changing infrastructure needs, and evolving delivery programmes. •	
Hailsham Town Council • Concerns about the funding, delivery, and timing of critical infrastructure, particularly along the A22 corridor, and seeks greater certainty before growth is phased. • Questions the delivery timescales for reservoir and wastewater infrastructure, and whether a new secondary school is needed to support growth. • Raises concerns about reliance on expanding existing schools and the implications for accessibility and sustainable travel. • Considers that the IDP and Local Plan provide insufficient clarity on the delivery of new green space and improvements to access existing green infrastructure in areas of need. • Notes the absence of proposals for new or enhanced community facilities within the Local Plan.	• The Council notes concerns regarding infrastructure funding, delivery, and timescales. The IDP/IDS identifies known requirements, delivery partners, funding sources, and risks, and will be updated as further information becomes available. • Infrastructure delivery has informed the Local Plan strategy, site assessments, and infrastructure planning process. • Water supply, wastewater, education, healthcare, green infrastructure, and community facility requirements have been informed by engagement with relevant providers and are reflected in the IDP. • The Council will continue to monitor infrastructure needs, delivery programmes, and funding opportunities through ongoing engagement with infrastructure providers and future IDP updates. • The Council welcomes continued collaboration with NHS Sussex ICB and other partners to ensure infrastructure provision keeps pace with planned growth.	No action required.

Crowborough Town Council • Supports a learner pool for the leisure centre, which is listed in the IDP as a high-priority goal. • Offers to discuss the availability of the Palesgate Lane site as a possible location for additional 3G pitches if WDC addresses the shortfall. • Notes that the IDP identifies additional spaces at Grove Park School but does not specify whether this relates to the primary or secondary site, or how it would be delivered.	• Comment noted. • Opportunities to meet identified needs for sports provision will continue to be explored through engagement with relevant stakeholders and the implementation of the Local Plan. • The education requirements identified in the IDP have been informed by East Sussex County Council's education planning evidence, and further detail regarding the nature and delivery of additional capacity will be developed through ongoing engagement with ESCC and future updates to the IDP. This project is under construction.	No further changes required.
Local Residents Regulation 18(1)	**WDC Response**	**Proposed Changes to IDP**
Infrastructure delivery • Concerns were raised about how infrastructure providers, including Southern Water, will meet the standards needed to deliver IDP projects. **Strength of the IDP** • The IDP should be strengthened to ensure that necessary infrastructure is delivered.	**Infrastructure Delivery** • The IDP has been informed by ongoing engagement with infrastructure providers, including utility companies, and will continue to be reviewed and updated to reflect emerging evidence, delivery programmes and infrastructure requirements. **Strength of the IDP** • The IDP has been updated since Regulation 18 and identifies infrastructure requirements, delivery partners, funding sources and delivery risks where information is available. As a living document, it will continue to be monitored and refined throughout the plan period.	No further changes required.

Highways • Concerns were raised about the backlog of local highway condition and capacity issues, including road surface quality, safety, road widths, capacity, weather sealing and preventative maintenance. **Growth impacts** • Concerns were linked to the expansion of new housing estates around Hailsham and the growth of domestic and business traffic. **Healthcare** • Concerns were raised about the provision of local medical services, including GP surgeries and qualified medical staff.	**Highways** • Infrastructure requirements and transport interventions necessary to support planned growth have been identified through the transport evidence base, ongoing engagement with East Sussex County Council and other relevant stakeholders and are reflected within the IDP where appropriate. **Growth Impacts** • impacts have been considered through the Local Plan evidence base, including transport modelling and infrastructure planning, and have informed the identification of infrastructure requirements and mitigation measures. **Healthcare** • Healthcare infrastructure requirements have been informed by engagement with NHS Sussex Integrated Care Board, NHS Property Services and healthcare providers and are reflected in the IDP. The Council will continue to work with healthcare partners to review service capacity, infrastructure requirements and delivery opportunities throughout the plan period.	
Local Residents Reg 18 (2)	**WDC Response**	**Proposed Changes to IDP**

Infrastructure Funding and Delivery • Questions the deliverability of allocations, including OEH1, given the absence of confirmed funding, delivery programmes, delivery mechanisms and timescales for transport, water, wastewater, education and healthcare infrastructure. • Considers the IDS requires further development for option sites, including identification of funding sources, delivery responsibilities and infrastructure phasing. • Raises concerns that many infrastructure projects remain subject to uncertainty, with delivery partners, funding arrangements and timescales yet to be confirmed. • Considers that critical infrastructure should be secured before, or alongside, development to ensure growth is deliverable and effective. **Transport Infrastructure and Accessibility** • Raises concerns regarding the lack of assurance that critical highway improvements, including A22/A27 improvements, will be delivered.	**Infrastructure Funding and Delivery** • The IDP and IDS identify known infrastructure requirements, delivery partners, funding sources and delivery timescales where information is available and have been updated through ongoing engagement with infrastructure providers and stakeholders. • The IDP is a living document and will continue to be monitored and updated as further evidence emerges, infrastructure programmes evolve and delivery arrangements become clearer. • The Council is satisfied that the infrastructure needed to support planned growth can be delivered, with detailed requirements, phasing and mitigation addressed through the planning application process and ongoing engagement with infrastructure providers. **Transport Infrastructure and Accessibility** • Transport infrastructure requirements have been informed by the transport evidence base, including transport modelling, engagement with East Sussex County Council and other relevant stakeholders, and are reflected in the IDP where appropriate. • The Council recognises the importance of sustainable transport infrastructure and has considered public transport, walking and cycling improvements through the Local Plan evidence base and infrastructure planning process.	• The IDP has been updated following engagement with infrastructure providers and other key stakeholders. • As the IDP is an iterative document, it will continue to be reviewed and updated as further evidence becomes available, and infrastructure requirements evolve.

• Suggests evidence on rural road capacity and traffic impacts is insufficient. • Raises concerns regarding the future provision of affordable, reliable and frequent public transport. • Considers the evidence base lacks a comprehensive active travel strategy and that the proposals risk creating car-dependent communities. • Suggests cumulative transport impacts have not been adequately assessed. **Water and Wastewater Infrastructure** • Raises concerns regarding the absence of confirmed delivery arrangements for drinking water and wastewater infrastructure. • Considers the IDP lacks a clear strategy for addressing water stress and wastewater capacity constraints. • Questions whether critical wastewater infrastructure improvements will be delivered in a timely manner. **Community Character and Place-Making** • Raises concerns that proposals may lead to car-dependent, poorly integrated development, increased	• Cumulative and strategic transport impacts continue to be considered through transport modelling and will continue to be reviewed through plan implementation and monitoring. **Water and Wastewater Infrastructure** • The Council has considered water supply and wastewater infrastructure requirements through the Local Plan evidence base, including the Water Cycle Study, and through engagement with Southern Water, South East Water and other relevant stakeholders. • The IDP identifies water and wastewater infrastructure requirements and recognises the need for infrastructure investment and network improvements to support planned growth. • The Council will continue to work collaboratively with infrastructure providers to monitor capacity constraints, infrastructure requirements and delivery programmes. **Community Character and Place-Making** • The Local Plan includes a range of policies relating to design quality, place-making, sustainable transport, green infrastructure and environmental protection to ensure new development is well-integrated and supports sustainable communities. • The suitability of proposed allocations has been assessed through the Local Plan evidence base,	

congestion and the loss of agricultural land. • Questions whether the Plan will deliver attractive, distinctive and well-connected communities. **Healthcare, Education and Utilities** • Notes that healthcare, education and utility infrastructure requirements remain subject to uncertainty, with limited confirmation of delivery mechanisms and funding arrangements. **Cumulative Growth Impacts** • Considers the IDP does not adequately assess the cumulative impacts of development across the district.	including consideration of landscape, accessibility, infrastructure and environmental effects. **Healthcare, Education and Utilities** • The Council has engaged with education authorities, NHS bodies, utility providers and other infrastructure partners to identify infrastructure requirements arising from planned growth, and these are reflected in the IDP. • Infrastructure requirements, funding opportunities and delivery arrangements will continue to be reviewed and updated through ongoing engagement with infrastructure providers and future updates to the IDP. **Cumulative Growth Impacts** • IDP has been informed by district-wide growth assumptions, infrastructure provider engagement and the wider Local Plan evidence base and will continue to be updated as further evidence becomes available.	
Other Comments	**WDC Response**	**Proposed changes to IDP**
• No comments.	n/a	n/a