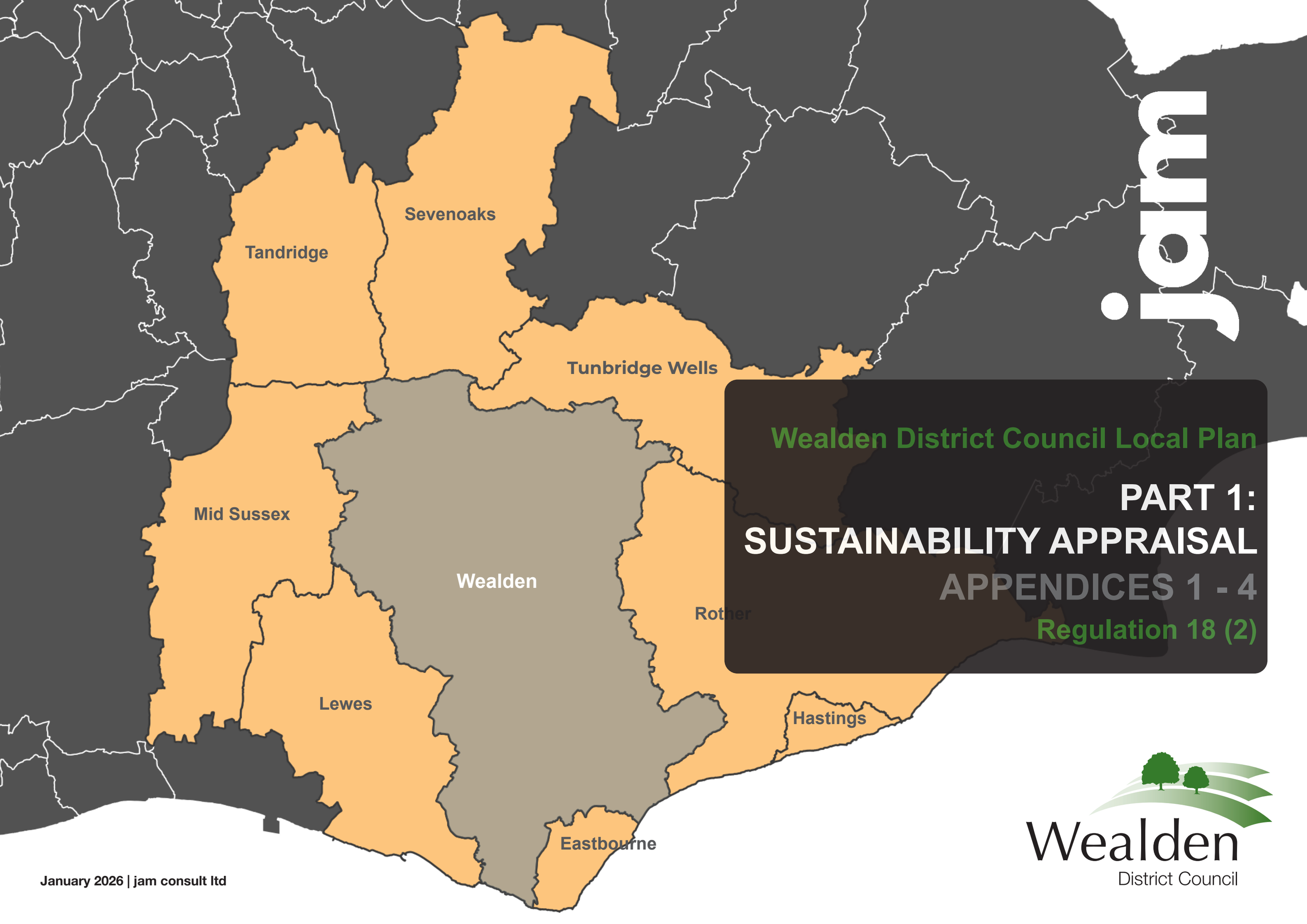


jam

Wealden District Council Local Plan

PART 1: SUSTAINABILITY APPRAISAL

APPENDICES 1 - 4

Regulation 18 (2)

Wealden District Council

January 2026 | jam consult ltd

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This report has been prepared using the evidence base provided by Wealden District Council. The conclusions and recommendations contained in this SA Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by Jam Consult Ltd has not been independently verified, unless otherwise stated in the Report. The work described in this Report was undertaken between May 2025 – January 2026 and is based on the information made available during this period. The scope of this report and the services are accordingly factually limited by the timescale available. It is recognised that further information may become available after this report has been published, which may need to be considered in any further work undertaken.

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APPENDIX 1: SA REGULATIONS

Information required in the Environment Report according to the SEA Directive		
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2). The information to be given in the report is set out in Article 5 and Annex I of the Directive as follows:		
SEA Directive Requirements		**LOCATION IN SEA REPORTS**
a	An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plan and programmes	Scoping Report
b	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Scoping Report
c	The environmental characteristics of areas likely to be significantly affected	Scoping Report
d	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Scoping Report
e	The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Scoping Report
f	The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Reg. 18(1) Initial SA Chapters 6-9 and Appendices Reg. 18(2) SA Chapters 6-14 and Appendices
g	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Reg 18(1) SA Chapter 10 and Appendices Reg. 18(2) SA Chapter 15 and Appendices
h	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Reg 18(1) SA Chapter 6-8 and Appendices Reg. 18(2) SA Chapters 6-13 and Appendices
i	A description of measures envisaged concerning monitoring in accordance with Article 10 Sections 2 and 9	Final SA
j	A non-technical summary of the information provided under the above headings.	Non Technical Summary
Consultation:		
	❑ authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4). ❑ authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2) ❑ other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	❑ Scoping Report 2023 ❑ Reg 18(1) Consultation on Initial SA Report, March 2024 ❑ Reg 18(2) Consultation on Focussed SA Report, January 2026
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8) Provision of information on the decision:		
	When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed: ❑ the plan or programme as adopted ❑ a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with the measures decided concerning monitoring (Art. 9 and 10)	❑ To be prepared on adoption of the Plan in 2026
Monitoring		
	❑ of the significant environmental effects of the plan's or programme's implementation (Art. 10)	❑ To be carried out on adoption
Quality Assurance		
	❑ environmental reports should be of a sufficient standard to meet the requirements of the SEA checklist Directive (Art. 12).	❑ Preparation has been carried out according to the regulations

APPENDIX 2: SA FRAMEWORK

Sustainability Objective		Decision Making Criteria		Sustainability Indicators
SO1 **CLIMATE CHANGE MITIGATION** **To become a net zero-carbon District by 2050 or sooner tackling the climate emergency through reductions in greenhouse gas emissions and reducing energy and fuel consumption**	1.1	Minimise or reduce greenhouse gas emissions?	1.1	Level of installed MWs of commercial scale renewable energy schemes (wind and solar) in the local authority area (Department for Business, Energy & Industrial Strategy)
	1.2	Ensure energy efficiency?	1.2	Per capita CO2 and total emissions in the local authority area, including the breakdown for buildings, industry and transport (Department of Energy and Climate Change)
	1.3	Promote the use of decentralised, renewable and low carbon energy?	1.3	Car and van availability by household in the local authority area (East Sussex in Figures)
	1.4	Support the provision of electric charging infrastructure to enable the take up of electric vehicles?	1.4	Publicly available electric vehicle charging devices at all speeds within the local authority area (Department for Transport)
	1.5	Ensure that development is located in sustainable locations?	1.5	Increase (Ha) in community allotments/orchards (Council records)
	1.6	Reduce embodied carbon emissions in new buildings?		
	1.7	Reduce space heating demand in new buildings?		
	1.8	Encourage local food production?		
	1.9	Promote sustainable methods of construction and design?		
SO2 **CLIMATE CHANGE ADAPTATION** **To reduce vulnerability to the adverse effects of climate change through adaptation and adjustment**	2.1	Contribute to climate change adaptation?	2.1	The percentage of new dwelling energy performance certificates at band C and above (Department for Levelling Up, Housing and Communities)
	2.2	Ensure the use of sustainable construction and design i.e. reduce overheating, incorporate trees /GI for urban cooling?	2.2	The percentage of all dwelling energy performance certificates (existing and new dwellings) at band C and above (Department for Levelling Up, Housing and Communities)
	2.3	Maximise opportunities to deliver nature-based solutions i.e. green infrastructure	2.3	The percentage of all non-domestic energy performance certificates at band C and above (Department for Levelling Up, Housing and Communities)
	2.4	Provide for future changes in energy supply?	2.4	Woodland as percentage of area in the local authority area; (Forest Research, Department of Agriculture, Environment and Rural Affairs).
	2.5	Ensure there is suitable energy infrastructure capacity?		
SO3 **FLOOD RISK** **To manage and reduce our vulnerability to flood risk taking into account climate change**	3.1	Reduce the risk of, and minimise flooding from all known sources, taking into account the impact of climate change?	3.1	Estimated number of properties in the local authority area at risk from flooding (Environment Agency)
	3.2	Avoid development in higher flood risk areas or in adjacent areas which would increase flood risks, having regard to the impacts of climate change?	3.2	Major planning permissions granted contrary to Environment Agency and Lead Local Flood Authority (LLFA) advice on flooding grounds (Environment Agency/East Sussex County Council)
	3.3	Support the provision of natural flood management solutions?		
	3.4	Encourage best practice measures for managing flood risk (i.e. SuDS or other flood alleviation measures)		
SO4 **WATER RESOURCES AND WATER QUALITY** **Protect our water resources and reduce water demand and consumption**	4.1	Promote measures to minimise water consumption and use?	4.1	Southeast Water Per Capita Consumption of Water in litres (South East Water)
	4.2	Encourage water efficiency?	4.2	Recorded water quality in rivers, estuaries and groundwater from River Basin Management Plans that includes the Cuckmere, the Adur and Ouse basins and Pevensey Marshes (Environment Agency)
	4.3	Ensure infrastructure is adequate to support water supply and sewer connections?	4.3	Percentage of river and groundwater units in the plan area with biological and/or chemical quality rated as good (Environment Agency)
	4.4	Ensure that wastewater treatment infrastructure is available?	4.4	Bathing Water Quality in Wealden District (Environment Agency)
	4.5	Protect water resources including those used for the supply of water and abstraction?	4.5	Planning permission granted contrary to Environment Agency advice on water quality grounds (Environment Agency)
	4.6	Improve the water quality of water resources?		

APPENDIX 2: SA FRAMEWORK

Sustainability Objective	Decision Making Criteria		Sustainability Indicators	
SO5 **SOIL, LAND & MINERALS** **Use land efficiently and maintain, conserve and enhance soil quality and mineral resources**	5.1	Minimise the loss of the best and most versatile agricultural land (Grades 1-3a)?	5.1	Allocations within a Local Plan that are located on safeguarded mineral sites (Council Records)
	5.2	Protect and enhance valued soils?	5.2	Allocations within a Local Plan on best agricultural land quality (Grade 1-3a) (Council Records and DEFRA)
	5.3	Prevent soil pollution?	5.3	Percentage of housing development recorded on greenfield/brownfield land (Council Records)
	5.4	Prevent land contamination and promote the remediation of contaminated land?	5.4	Percentage of employment development (Use Class E(g), B2 and B8) recorded on greenfield/brownfield land (Council Records)
	5.5	Seek to prevent soil disturbance, compaction or erosion including promoting best practice in construction?	5.5	The number of dwellings recorded on the Brownfield Land Register during the monitoring period (Council records)
	5.6	Ensure the efficient use of land?		
	5.7	Prioritise the use of previously developed (brownfield) land to minimise greenfield development?		
	5.8	Reduce the amount of derelict, underused and vacant land, and promote the re-use of buildings?		
	5.9	Prevent the sterilisation of mineral deposits?		
SO6 **WASTE & MATERIALS** **Reduce and minimise waste and promote resource efficiency through reuse and recycling (circular economy)**	6.1	Promote sustainable waste management in line with the waste hierarchy – reduce, reuse, recycle, recover, disposal?	6.1	Estimated Household Waste produced in tonnes in the local authority area (East Sussex County Council Record)
	6.2	Prevent and minimise waste through sustainable design and construction including the re-use of aggregates and the use of sustainable/local materials?	6.2	Estimated Household Waste produced collected in tonnes per capita in the local authority area (East Sussex County Council Record)
	6.3	Ensure the provision of waste and recycling facilities within homes and at commercial premises?	6.3	Estimated Percentage of Household Waste recycled or composted in the local authority area in tonnes (East Sussex County Council Record)
	6.4	Reduce household and business waste generated/ head of population?		
	6.5	Reduce construction waste?		
SO7 **POLLUTION** **To reduce air, noise and light pollution**	7.1	Minimise increases in traffic and congestion?	7.1	Estimated traffic flows by all vehicles within East Sussex (East Sussex County Council Record, Department for Transport))
	7.2	Ensure that development minimises exposure to poor air quality?	7.2	Number of designated AQMAs in the local authority area (Council records)
	7.3	Avoid, mitigate or reduce noise pollution?	7.3	Dark Skies Ranking by local authority area (Campaign to Protect Rural England)
	7.4	Ensure that development is located away from major sources of noise?	7.4	The rate of complaints about noise (Public Health Outcome Framework PHOF B14a)
	7.5	Protect tranquil areas from noisy activities?	7.5	The percentage of the population exposed to road, rail and air transport noise of 65dB(a) or more, during the daytime (Public Health Outcomes Framework PHOF B14b)
	7.6	Limit the impact of light pollution including not adversely affecting the International Dark Skies Reserve?		
SO8 **GREEN & BLUE INFRASTRUCTURE** **To improve the quality and connectivity between functional habitats and green spaces to provide for people and nature recovery**	8.1	Positively contribute to nature recovery?	8.1	Hectares of green and blue infrastructure delivered through strategic site allocations (Council Records)
	8.2	Support the provision of new or enhanced green or blue infrastructure?	8.2	Hectares of Suitable Alternative Natural Green Spaces (SANGS) delivered through strategic site allocations (Council Records)
	8.3	Prevent the loss of green or blue infrastructure?	8.3	Average distance to nearest Park, Public Garden, or Playing Field in metres for the local authority area (ONS)
	8.4	Increase or improve access to green space?	8.4	Average number of Parks, Public Gardens, or Playing Fields within 1km radius (ONS)
	8.5	Ensure that existing ecological networks are not compromised and future improvements in connectivity are not prejudiced i.e. through fragmentation?	8.5	The loss and/or inappropriate development of Local Green Spaces during the monitoring period (Council Records)
			8.6	Quantity of open spaces provided through residential developments annually (Council Records).

APPENDIX 2: SA FRAMEWORK

Sustainability Objective	Decision Making Criteria		Sustainability Indicators	
SO9 BIODIVERSITY **To protect and enhance biodiversity and geodiversity**	9.1	Maintain and enhance International / European designated sites?	9.1	The recorded condition/status of designated ecological sites in the district that includes the Ashdown Forest SPA/SAC and Pevensey Levels SAC and Ramsar Site (i.e. the proportion of the SSSI units in favourable condition or unfavourable recovering condition (Natural England)
	9.2	Maintain and enhance nationally designated sites?	9.2	Estimated visitor numbers on designated ecological sites, namely the Ashdown Forest SAC/SPA (Council records)
	9.3	Maintain and enhance locally designated sites?	9.3	Estimated visitor numbers on SANGS within the local authority area (Council records)
	9.4	Ensure that development follows the mitigation hierarchy (Avoid, minimise, remediate, compensate)?	9.4	The number of new dwellings (net) completed within the 400 metre to 7km buffer of the Ashdown Forest SPA during the monitoring period (Council records)
	9.5	Conserve, restore and enhance priority habitats including those located within Biodiversity Opportunity Areas (BOAs)?	9.5	Changes in (a) priority habitats and species (by type) and (b) change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub regional or local significance (Council records)
	9.6	Protect and support the recovery of priority species?	9.6	The number of sites that deliver at least 10% biodiversity net gain through the planning application process (Council Records)
	9.7	Protect irreplaceable habitats (e.g. ancient woodland / veteran trees)?	9.7	Area (Ha) under Woodland Trust Management. (Woodland Trust)
	9.8	Conserve, enhance or improve biodiversity by design?		
	9.9	Seek to secure a minimum of 10% or higher biodiversity net gain?		
	9.10	Lead to the creation of new habitat?		
SO10 LANDSCAPE & TOWNSCAPE **To protect and enhance the District's urban and rural landscape and townscape**	10.1	Protect and enhance the quality and local distinctiveness of the District's landscapes and townscapes?	10.1	The number of new dwellings completed (net) within the High Weald AONB in the local authority area (Council Records)
	10.2	Conserve and enhance the High Weald AONB?	10.2	The quantum of floorspace (net) for employment uses (Use Class E(g), B2, B8) completed within the High Weald AONB in the local authority area (Council Records)
	10.3	Impact upon the South Downs National Park and its setting?	10.3	The percentage of new dwellings completed (net) within the High Weald AONB compared with the remainder of the district (Council Records)
	10.4	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes?		
	10.5	Protect and enhance valued landscape features and characteristics and promote local distinctiveness?		
	10.6	Protect and enhance the distinct identities and setting of a settlement, its character and its setting including sensitive design?		
	10.7	Enhance local distinctiveness in town and village centres?		
	10.8	Promote high quality design in context with its urban / rural landscape?		
	10.9	Improve the public realm?		
SO11 HISTORIC & CULTURAL HERITAGE **To improve and enhance the District's historic environment and cultural heritage asset**	11.1	Help to conserve and/or enhance heritage assets, cultural heritage and historic character of place?	11.1	The number of heritage assets recorded as 'at risk' in the local authority area (English Heritage)
	11.2	Protect the setting of heritage assets?	11.2	The number of new designated and non-designated heritage assets recorded in the monitoring year in the local authority area (English Heritage, Council Records)
	11.3	Protect sites and features of archaeological value?		
	11.4	Promote and develop and where appropriate increase access to cultural and heritage assets and settings?		

APPENDIX 2: SA FRAMEWORK

Sustainability Objective	Decision Making Criteria		Sustainability Indicators	
SO12 DIGITAL INFRASTRUCTURE **To improve digital infrastructure and connectivity to ensure it meets the needs of all our communities**	12.1	Improve digital infrastructure and broadband coverage?	12.1	Average Broadband Speed across the local authority area (East Sussex County Council Record/Ofcom)
	12.2	Improve mobile phone connectivity and services?	12.2	Fibre to the property availability in percentage terms in the local authority area (East Sussex County Council Records/Ofcom)
SO13 TRANSPORT & ACCESSIBILITY **To encourage efficient patterns of movement, promote sustainable and active travel and ensure access to key local services and facilities**	13.1	Reduce the need to travel by car, including accessing services, facilities, work and leisure?	13.1	Travel to work distances (Census)
	13.2	Reduce journey times?	13.2	Travel to work mode (Census)
	13.3	Improve public transport provision, including frequency of services?	13.3	The percentage of residents within 15 & 30 minutes of primary schools by transport mode (walking, cycling and car) (Department for Transport)
	13.4	Consider the capacity of the existing infrastructure and ensure appropriate mitigation and/ or new/improved transport infrastructure can be provided where required?	13.4	The percentage of residents within 15 & 30 minutes of employment centres by transport mode (walking, cycling and car) (Department for Transport)
	13.5	Promote and facilitate sustainable travel, active travel and healthy streets?	13.5	The percentage of residents within 15 & 30 minutes of a food store by transport mode (walking, cycling and car) (Department for Transport)
	13.6	Support the delivery of 20 minute walkable neighbourhoods?	13.6	The percentage of residents in the local authority area who walk (at least ten minutes), or cycle 3 times per week; (East Sussex County Council Record)
	13.7	Create safer routes and permeability for both pedestrians and cyclists?	13.7	The number of bus journeys taken in East Sussex for each monitoring year (East Sussex County Council Record)
	13.8	Avoid impacts on the quality and extent of public footpaths, bridleways and / or the cycle network, and create opportunities for enhancing connectivity?		
	13.9	Help to connect communities by improving access to key services and facilities?		
	13.10	Provision and retention of key services and facilities?		
SO14 HOUSING **To provide suitable and sustainable housing that meets local needs**	14.1	Contribute to housing supply and deliver homes in sustainable locations?	14.1	New homes (net) completed in the monitoring year (Council records)
	14.2	Contribute to meeting local housing needs, including the provision of affordable and specialist homes to meet the identified needs for all sections of society?	14.2	New homes (net) approved planning permission in the monitoring year (Council records)
	14.3	Provision of homes that meet the necessary sustainability and design standards?	14.3	New permanent pitches/plots approved planning permission in the monitoring year (Gypsy and Traveller) (Council records)
	14.4	Ensure the provision of sufficient and suitable new homes to meet identified needs for all sections of society?	14.4	New affordable homes (net) completed in the monitoring year (Council records)
	14.5	Provide self-build and custom-build housing plots?	14.5	Ratio of median house price to median gross annual (where available) workplace-based earnings in Wealden
	14.6	Ensure that an appropriate mix of dwelling size, type and tenure is provided?	14.6	The percentage of new 1, 2, 3 and 4+ bedroom dwellings (net) delivered within a monitoring period in the local authority area
	14.7	Reduce the number of unsuitable/unfit homes?	14.7	The number of new applicants to the Self-Build and Custom Build Register during the monitoring period (Council records)
	14.8	Reduce or prevent homelessness?	14.8	The number of self-build and custom built plots granted planning permission (secured through a S106 agreement) during the monitoring period (Council records)
			14.9	Homeless Assessment as owed a duty (Department for Levelling-Up, Housing and Communities.

APPENDIX 2: SA FRAMEWORK

Sustainability Objective	Decision Making Criteria		Sustainability Indicators	
SO15 **HEALTH & WELLBEING** **To protect and improve the health and well-being of the District's population and reduce health inequalities**	15.1	Contribute to improving health and well-being?	15.1	Child Obesity Levels within Wealden District at Year 6 (ages 10-11) (NHS)
	15.2	Contribute and encourage healthy lifestyles for all?	15.2	Life Expectancy for Males and Females in Wealden (East Sussex County Council and NHS)
	15.3	Contribute to the provision, protection, enhancement or expansion of sport and recreation facilities?	15.3	The percentage of residents within 30 minutes of GPs by transport mode (walking, cycling and car) (Department for Transport)
	15.4	Impact a designated Local Green Space?	15.4	The percentage of Wealden residents who consider themselves to have a disability (Census)
	15.5	Ensure development is located in reasonable proximity to medical services with sufficient capacity to meet needs?	15.5	Quantity (Ha) of additional open,space, sports and recreation facilities (Council records)
	15.6	Support the diverse health needs within the community including those associated with an ageing population?	15.6	The number of sports playing fields loss during a monitoring period in the local authority area (Council records)
			15.7	Percentage of physically active children and young people, persons, 2021/22 (PHOF C10)
			15.8	Percentage of physically active and inactive adults,persons, 2021/22 (PHOF C17a and C17b)
			15.9	Percentage of adults who feel lonely often or always or some of the time, person, 2019/20 (PHOF B19)
SO16 **QUALITY OF LIFE & PLACE** **To create safe and attractive places, which contribute towards quality of life and community cohesion**	16.1	Help to reduce crime and fear of crime in the District?	16.1	The recorded rate of crime offences per 1,000 of the Wealden population (East Sussex County Council Record)
	16.2	Promote the use of 'Secured by Design' principles, which contribute towards a safe and secure built environment?	16.2	The recorded rate of violent crime offences per 1,000 of Wealden population (East Sussex County Council Record)
	16.3	Contribute to the creation of a sense of place, which is well-designed, inclusive, accessible for all and reduces social isolation?		
	16.4	Ensure good quality design including the use of design codes, where appropriate?		
SO17 **SOCIAL INCLUSION** **To tackle social deprivation by improving access to essential services and facilities, supporting diversity and equality for all**	17.1	Help to overcome social exclusion?	17.1	Indices of Multiple Deprivation Ranking across the Country (Department for Levelling Up, Housing and Communities);
	17.2	Help to address issues of deprivation, disadvantage or poverty?	17.2	Proportion of Lower Super Output Areas within the most deprived 20% of wards in the country (Department for Levelling Up, Housing and Communities);
	17.3	Help address inequality for those with protected characteristics?	17.3	Percentage of children in low income families within the monitoring period (East Sussex County Council Record);
	17.4	Help reduce dependency on benefits?	17.4	The number universal credit claimants in the local authority area each monitoring period (East Sussex County Council Record)
	17.5	Encourage engagement and participation in the community?	17.5	No. of residents in fuel poverty at local/regional and national level. (ONS)

APPENDIX 2: SA FRAMEWORK

Sustainability Objective	Decision Making Criteria		Sustainability Indicators	
SO18 ECONOMY & EMPLOYMENT **To maintain high levels of employment and encourage sustainable economic growth across the District, including higher value jobs**	18.1	Protect the amount of existing employment floorspace in the District?	18.1	Net additional gains in employment floorspace (Use Class E(g), B2, B8) in the district over the monitoring period (Council Records)
	18.2	Support the delivery of employment floorspace requirements through expanding or making land available for new employment sites?	18.2	The number of business enterprises within the local authority are each year (East Sussex County Council Records)
	18.3	Encourage the retention and provision of small business units to meet the needs of small and medium enterprises?	18.3	New Business Registration Rate in the local authority area (East Sussex County Council Records)
	18.4	Support businesses performance, growth and resilience?	18.4	Percentage of working age residents who are unemployed (East Sussex County Council Records)
	18.5	Support and encourage both urban and rural businesses to grow, expand and diversify?	18.5	Economic Inactivity Rates in the local authority area (East Sussex County Council Records)
	18.6	Support the growth of sustainable tourism and leisure sectors?	18.6	The total number of visitor trips undertaken within the local authority areas (millions) (South East Tourism)
	18.7	Protect and restrict the loss of tourism accommodation and visitor attractions?	18.7	The total amount of expenditure (£) by tourists during visits (millions) (South East Tourism)
	18.8	Support the tourism sector by increasing overnight stays and visitor spend?		
	18.9	Assist in making Wealden an attractive place to visit?		
	18.10	Support the provision of higher value jobs?		
	18.11	Assist in delivering the District's employment needs?		
	18.12	Create new employment opportunities and local jobs?		
SO19 TOWN & VILLAGE CENTRES **Protect and enhance the viability and vitality of town or village centres**	19.1	Help retain and provide additional retail floorspace?	19.1	Net Additional Gains/Losses in retail floorspace (Use Class E(a) in the district over the monitoring period (Council Records)
	19.2	Decrease the number of vacant units?	19.2	Net Additional Gains/Losses in retail floorspace (Use Class E(a) in designated town centres over the monitoring period (Council Records)
	19.3	Support the long-term vitality and viability of town and village centres?	19.3	Net Additional Dwellings (Use Class C3) in designated town centres over the monitoring period (Council Records)
	19.4	Support town centre first principles and limit out of town retail?	19.4	The percentage of vacant units with designated town centres during the monitoring period (Council Records
	19.5	Support high street businesses and the provision of business opportunities?	19.5	The percentage of residents within 30 minutes of a Town Centre by transport mode (walking, cycling and car) (Department for Transport)
	19.6	Support the provision of residential development in our town centres?		
	19.7	Provide for resident and visitors needs including places of work, places to socialise and key services and facilities?		
	19.8	Help improve the night-time economy?		
SO20 EDUCATION & SKILLS **To improve the level of skills, education and training of the District's population**	20.1	Improve qualifications and skills of young people and adults?	20.1	Percentage of working age population with level 4 (or more) qualifications (Census)
	20.2	Assist to meet the skill needs of businesses including that required for greener jobs?	20.2	Percentage of working age population with no qualifications (Census)
	20.3	Deliver opportunities for education, apprenticeships and vocational training?	20.3	Apprenticeships (of all levels) starts and completions during the monitoring period (East Sussex County Council Records)
			20.4	School Capacity within the district for secondary school and primary school places (East Sussex County Council Records)

APPENDIX 3

Initial SA Regulation 18(1) Representations, 2024

APPENDIX 3: Regulation 18(1) SA Representations: Statutory Consultees

1 Introduction

1.1 Regulation 18(1) Initial SA Report

1.1.1 The Initial SA Report was issued for consultation alongside the Regulation 18 Local Plan in March 2024 until May 2024. A total of 30 direct responses were received in relation to the Regulation 18 Initial SA report. Some additional responses in relation to the SA were made on other areas of the Local Plan, which have implications for the SA. This report seeks to capture all the relevant responses in relation to the SA for completeness.

1.1.2 Local Authorities are required to consult with statutory consultees when preparing the SA of the Local Plan, including:

- ❑ The Environment Agency
- ❑ Historic England
- ❑ Natural England.

1.1.3 With regards to the response from statutory consultees for the SA process: The Environment Agency did not raise any specific issues on the SA. Historic England considered it too early in the process to make detailed comments.

1.1.4 Natural England provided a detailed response and raised a range of issues, which are set out in this report. In particular, Natural England had significant concerns about the Frant site allocations given the considerable direct impacts to the High Weald National Landscape and the effect this will have on the conservation of the natural beauty of the High Weald. Natural England is also concerned about the considerable amount of development proposed in the environs of Pevensey Levels SAC/ Ramsar site (within 500m-1km). These sites drain directly into the Pevensey SAC Ramsar. These applications should be considered together to fully inform cumulative impacts from such a large quantum of development on the international sites, and to adopt a masterplanning strategy, in order to avoid impacts and seek opportunities to secure a joined-up approach to SuDs and Green Infrastructure.

1.1.5 The Council also consulted neighbouring Councils and Duty to Co-operate Partners, Town and Parish Councils, Local Organisations and the Local Community.

1.1.6 Other key issues raised in the consultation included:

- ❑ **Spatial Strategy and Growth Options**

  Concern was raised by several respondents with regard to the Spatial Strategy and Growth Options, particularly the failure to meet the identified housing need for the District by approximately 4,000 homes. The Spatial Strategy and Growth Options are being reviewed as part of the next stage of the Local Plan, including the implications of the revised NPPF and Government guidance on housing need issued in December 2024. The revised Local Plan will then be subject to further sustainability appraisal and consultation.

- ❑ **Transport and Accessibility**

  National Highways has provided detailed comments on the impact of the Local Plan upon the Strategic Highway Network as well as the Transport Modelling needed to assess proposals. WDC has engaged with National Highways in the development of the Local Plan and will continue to do so as the Plan progresses. Various responses also raised the need to strengthen the use of sustainable modes of transport through the plan to reduce the related impacts upon climate change.

- ❑ **Frant and Horam**

  Several respondents consider the proposed allocations in Frant and Horam to be inappropriate and that options should be considered without these allocations. The inclusion of allocations in these locations will be reviewed as part of the Growth Option review.

- ❑ **Other Site Allocations**

  A range of other site allocations have received comments either in terms of objection or as a result of additional information made available by developers which may alter the results of assessment. Concern has also been raised regarding the accuracy of the assessments and some responses being contradictory. The proposed site allocations in question have been reviewed as part of the revised SA.

1.1.7 A summary of the responses is set out in the tables within this report, including a response to the issues raised from WDC and any proposed changes to the SA.

APPENDIX 3: Regulation 18(1) SA Representations: Statutory Consultees

STATUTORY CONSULTEES AND KEY CONSULTATION BODIES					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
1	**British Regional Transport Association**		No specific comments on SA		
2	**Environment Agency**		No specific comments on SA		
3	**High Weald Joint Advisory Committee**	**Policies**	The policies are generally supported but some strengthening of the text has been proposed	Noted. Proposed changes to policies to be reviewed	**SA of relevant policies to be reviewed**
		Site Allocations	Significant concerns are raised with a number of the proposed site allocations and development boundary extensions in terms of impacts on the natural beauty of the High Weald AONB. Firmly consider that site specific allocation policies should be provided within the Local Plan Reg 19 version (including site specific requirements) for sites within or affecting the setting of the High Weald National Landscape, to ensure that such development is managed and coordinated within each location, and to ensure that clear and realistic expectations for each site are set. Any site allocations proposed for grassland sites in the AONB should also be subject to grassland surveys, and if found to be unimproved grassland these should not continue to be allocated for development in the Reg 19 version, since this is an important habitat type within the High Weald AONB, and an important part of its landscape character and natural beauty. Object to the following sites: HEA6, HEA9, WIT2, FR2, FR3, FR5, FR6, FR7, WIT1, HAR1, HAR2, HEA3, HEA4, HEA5 (in part),	Noted. Site allocations to be reviewed.	**SA of Site Allocations to be reviewed**
		LURA 2023	In addition to the above comments, attention is drawn to Section 245 of the Levelling-Up and Regeneration Act 2023, which has introduced important changes to legislation around protected landscapes. In particular, with regard to Areas of Outstanding Natural Beauty, Section 245(5) to (10) of the Act amends the Countryside and Rights of Way CRoW) Act	Noted. Changes as a result of LURA to be checked and reflected in the Local Plan The Council will need to demonstrate how it has, through all stages of the preparation of the Local Plan, sought to further the purpose of conserving and enhancing the natural beauty of the High Weald NL	**Check SA evidence base and PPPs.** **Provide evidence of how the conservation and enhancement of the High Weald NL is strengthened through the Local Plan**
4	**Historic England**	**General**	It is noted that as an early stage in the formulation of a local plan the current document may be subject to significant change and consequently consider it appropriate to limit comments to more general matters. Furthermore, specific and detailed comments will be provided at later stages in the plan making process as appropriate.	Noted.	**None**
		Evidence	Evidence on which policies for the historic environment are prepared should be published, as required by paragraph 199 of NPPF. A heritage SPD or heritage strategy can be a useful tool to amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan. A heritage conservation strategy can help with site allocations in terms of considering environmental and policy constraints against the evidence in the relevant Strategic Housing Market Assessment (ref. Planning Minister's letter to Chief Planners 19 December 2014 www.gov.uk/government/publications/strategic-housing-marketassessments).	Evidence base to be reviewed as the Local Plan is progressed	**Review Evidence**

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STATUTORY CONSULTEES AND KEY CONSULTATION BODIES					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
5	**National Highways**	**Strategic Road Network (SRN)**	National Highways has concerns with regard to proposals that have the potential to impact on the safe and efficient operation of the SRN, in addition to the cumulative impact on the SRN of targeted growth. Consequently, we are required to determine the impact of the emerging WDC Local Plan, particularly at the A27 which runs in an east-west direction in the south of the WDC area (Figure 1). Junctions of note along the A27 include: • A27/ A259/ Wartling Road/ Sluice Lane (Pevensey Roundabout); • A27/ A22 (Golden Jubilee Roundabout); • A27/ A22/ B2247 (Cop Hall Roundabout); • A27/ A2270; • A27/ Station Road/ Alfriston Road (Berwick Roundabout). National Highways would suggest that the impacts of the emerging Local Plan need to be understood at the following locations: • The A27 north of Eastbourne. • The A259 in-between Pevensey and Bexhill-on-Sea; and potentially • The A21 located east of WDC's authority within Rother District Council's (RDC) authority.	Noted. Impact of growth on SRN to be assessed and considered in the review of the Growth Options and SA.	**Points to be noted in the next stage Review of the SA**
		SA Scoping Report	• Circular 01/2022 had not been considered in SA Scoping. • No commitment to delivery of RIS3 schemes. • Cumulative impacts of development in neighbouring authorities must be considered in line with Circular 01/2022 paragraph 29. • The need for any SRN mitigation must be considered after all options have been taken to maximise the accessibility by sustainable transport modes, and there cannot be any presumption that infrastructure required to mitigate impacts will be funded through a future RIS. • It would be proactive for engagement between National Highways, East Sussex County Council and WDC regarding the use of the "new County-wide Transport Model" and to agree the suitability of the base model for Local Plan testing. • National Highways should be consulted on the criteria to be used to assess potential Local Plan sites to ensure that sites capitalise on the above opportunities and are located in the most sustainable locations in order to support local facilities and reduce the cost of infrastructure needed to make sites sustainable in accordance with the Circular and NPPF. • Concerned with the reference to a Reg. 18 Local Plan and stated that, given the evidence submitted to date, this was premature. National Highways would have expected to be consulted on the issues and options, site selection methodology, submitted sites, and preferred sites, before a Local Plan including draft site allocations is prepared and submitted.	National Highways did not comment at the Scoping Report consultation stage in 2023.	**Points noted and to be taken into account in the next stage Review of the SA**
		Evidence Base	National Highways would recommend that WDC use current Census data to highlight the issues relating to private vehicle use and the lack of public transport provision within the District, using such data sets such as method used and distance to travel to work and car availability.	Evidence base to be checked. Will be covered in more detail in the Transport Assessment to support the next stage of the Local Plan	**Review Evidence**
		Roads Investment Strategy 3 (RIS3).	At the time of writing, there is no commitment to the delivery of RIS3 schemes.	Impact of the lack of commitment to the delivery of RIS3 schemes on Local Plan to be considered	**Review Evidence and SA**
		Vision and Objectives	National Highways supports the Council's vision and objectives in relation to transport including: • Living safe, inclusive and healthy lives; and • Vibrant town and local centres.	Noted	**None**
		Spatial Strategy	National Highways would expect the policy to specifically relate to 20-minute neighbourhoods and providing development within sustainable locations in order to promote active travel and the use of public transport. Local Plan must consider cumulative impacts of development in neighbouring authorities in line with Circular 01/2022 paragraph 29.	Policy SS1 to be reviewed in light of comments Comments to be take account in relation to Policy SS1	**Review SA of Policy and Cumulative impacts**
		Sustainable Settlement Study and Housing Allocations	National Highways would suggest that the list of services considered by WDC, to assess the accessibility of the settlements, is appropriate. National Highways recommends it is consulted on the potential locations of new housing development sites to ensure that they are located in the most sustainable locations in order to support local facilities and reduce the cost of infrastructure needed to make sites sustainable in accordance with Circular 01/2022 and NPPF.	To be considered as part of the review of the proposed site allocations, where necessary consultation with statutory bodies will be prioritised.	**Review Site Allocations**

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STATUTORY CONSULTEES AND KEY CONSULTATION BODIES					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
5	**National Highways**	**Employment Allocations**	Recommend within Policy SS5 and SS6, WDC includes a commitment to ensuring that employment floorspace is allocated within sustainable locations so that the policy aligns with the requirements of Circular 01/2022, where National Highways expects strategic policy-making authorities to promote development at locations that are or can be made sustainable. Recommend that National Highways are consulted on all employment site allocations between Regulation 18 and 19 to determine the potential impact of employment sites on the SRN. Cumulative impacts of development in neighbouring authorities to be considered in line with Circular 01/2022 para 29.	To be dealt with in response to Policy SS5 and SS6 in the Local Plan	**Review Site Allocations and Cumulative Impacts**
		Climate Change	National Highways recommend that a firm commitment to net zero maintenance and construction emissions by 2040 and net zero road user emissions by 2050 be included within the Local Plan.	Noted and to be considered in relation to the Climate Change chapter of the Local Plan.	**Review SA**
6	**1258807 Natural England**	**General**	Natural England supports the strong policy wording within the consultation draft of the Local Plan with the presumption against developments and allocations which would result in adverse impacts to the rich biodiversity, geodiversity and landscape of the District. However, it appears that a number of the allocation sites may be contrary to the local plan policies and are of key concern on landscape and biodiversity grounds. The Council must ensure that sites that are taken forward are those which have minimal or no environmental impact, and that robust justification is required for allocating area which will have significant impacts. The SA is not currently sufficiently detailed to make a clear assessment of the proposed allocations and policies and for example appears contradictory in assessment of growth strategies which contain similar allocations.	Noted. Growth Strategies and Site Allocations to be reviewed in the context of NE's comments. The SA will be further developed to help inform the clear selection of sites and reasonable alternatives without duplicating the process of identified developable sites as part of the SHELAA.	**Review Growth Strategies and Site Allocations**
		Key Sustainability Issues	Climate Change should also include resilience of habitats and species and safeguarding their ability to adapt to the impact of climate change. Local Plans have a key role to play in ensuring development is located in the most sustainable locations and to secure robust strategies such as GI, and Nature Recovery Networks are secured to ensure resilience of habitats and species through the Plan.	Noted. Text to be amended.	**Add resilience of habitats and species/ safeguarding their ability to adapt to climate change etc. to key issues.**
		S09 Biodiversity	Advise that the condition of SSSIs should not be used as an indicator of local plan success. The condition of SSSIs is within the remit of Natural England and is not directly applicable to Local Plans. NE notes that there is no reference to the restoration or enhancement of biodiversity, with the issues referring only to avoiding damage. Recommend that the restoration or enhancement of biodiversity is included in line with the National Planning Policy Framework. NE notes that there is no specific reference to the loss of Best and Most Versatile agricultural land. NE notes that there is no reference to improving people's access to nature (be that to linear routes or open space). This should be included as a key issue. NE advises that enhancement of protected sites and securing nature recovery networks strategically via connectivity of sites through the landscape and the Weald to Wave Priority Area should be included in the decision-making process and as an indicator.	The SA Framework **(pp35-46**) sets out the key Sustainability Issues, decision making criteria and sustainability indicators used in the SA process. These were consulted upon in the Scoping Report and updated in the Reg 18 Initial SA Report. The condition of SSSIs is just one indicator which is used to determine if the Local Plan policies are being effective and is a common sustainability indicator used in SAs of Local Plans. SO9 Biodiversity's Indicator is **'to protect and enhance biodiversity and geodiversity'**, including ten decision making criteria and seven sustainability indicators which seek to maintain, protect, restore and enhance biodiversity. SO5 Soil Land and Minerals SO5.1 refers to the loss of agricultural land **'Minimise the loss of the best and most versatile agricultural land (Grades1-3a)'** The change in habitats and designated areas is monitored through the biodiversity report as part of the AMR process.	**No changes required**

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STATUTORY CONSULTEES AND KEY CONSULTATION BODIES					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
6	1258807 Natural England	**S09 Biodiversity**	Nature recovery should be an overarching vision and indicator of the Plan with clear links to climate change resilience of habitats and species.	SO8 Green & Blue Infrastructure's aim is '**To improve the quality and connectivity between functional habitats and greenspaces to provide for people and nature recovery**.' Decision Making Criteria SO8.1-5 refer to nature recovery and networks. 8.4 refers to access to nature and Indicators 8.1-8.6 address both issues. SO2.4 refers to the need to 'Maximise opportunities to deliver nature-based solutions i.e. green infrastructure.'	**No changes required**
		SO10 Landscape & Townscape	Advise that as the Objective is to protect and enhance, the indicators should reflect this - for example the success of the local plan to enhance these nationally important landscapes, not simply the number of applications within these areas.	It is considered that there is appropriate policy coverage in the Local Plan.	**Indicators to be reviewed as part of SA**
		S015 Health and Wellbeing	Advise that links to this objective and the health and wellbeing benefits of access to greenspace is captured. We note that there is no reference to improving people's access to nature (be that to linear routes or open space). This should be included as a key issue in the Spatial strategy.	SO8.4 refers to access to nature. Sustainable travel and accessibility is also covered in SO13. 15.4 also includes the impact of a designated Local Green Space Indicator 15.5 measures the quantity of open space. 15.7 and 15.8 address residents' activity levels	**Ensure that access to open space generally is addressed in the Spatial Strategy**
		Spatial Strategy	It is not clear how the spatial strategies have been appraised. For example Strategies with similar allocations have differing appraisals one being discounted for landscape impacts and the other not when the landscape impacts appear to be the same. Furthermore, the avoidance of significant development in the High Weald Protected Landscape in Option C appears to be described as a negative factor in this strategy' appraisal and a reason to not pursue this option. This neither follows the NPPF nor the Wealden Local Plans policies. Advise that further qualification analysis and appraisal is required.	Growth options to be reviewed	**Review landscape impacts of Spatial Strategies, in particular Option C and the impact in High Weald Protected Landscape**
		Green Infrastructure Indicators	NE's advice has focused on such potential use of NE's GIF in Wealden Local Plan's policies, indicators, which should be referenced.	Noted.	**NE's GIF to be checked against SA indicators, and check for suitable reference points in the Local Plan**
		Frant Site Allocations	Natural England has significant concerns about the Frant allocation sites given the considerable direct impacts to the High Weald National Landscape and the effect this will have on the conservation of the natural beauty of the High Weald. England considers that these allocations appear contrary to the strong policy protection in the NPPF and Policy NE7 of the draft Wealden Local Plan. The Council must also seek to further the conservation and enhancement of the natural beauty of the High Weald National Landscape through the Plan and development management following the strengthened duty in Section 85 of the Countryside and Rights of Way Act 2000 (as amended by Section 245 of the Levelling Up and Regeneration Act, 2023).	Frant Site Allocations to be reviewed to consider the nature and scale of the impacts resulting from these allocations and how they accord with the strong policy protection afforded to National Landscapes. Where significant impacts to the National Landscape are likely to result, alternative proposals should be fully explored which have no or a lesser environmental impact.	**Review Site Allocations**
		Hailsham and Hellingly Allocations	NE has significant concerns regarding the considerable amount of development proposed in the environs of Pevensey Levels SAC/Ramsar site (within 500m-1km). These sites drain directly into the Pevensey SAC. Ramsar. These applications should be considered together to fully inform cumulative impacts from such a large quantum of development on the international sites, and to adopt a masterplanning strategy in order to avoid impacts and seek opportunities to secure a joined- up approach to SuDs and Green Infrastructure. NE would very much welcome working with WDC to achieve this.	Noted. Site allocations to be reviewed including the cumulative impacts in consultation with NE.	**Review Site Allocations**
		Uckfield Allocations	NE is concerned that the nature and scale of development around Uckfield risks significantly impacting irreplaceable ancient woodland impacts to ancient woodland. This must be considered in combination and any impacts such as fragmentation, and deterioration must be clearly assessed and avoided.	Noted. Site allocations to be reviewed including the cumulative impacts.	**Review Site Allocations**

APPENDIX 3: Regulation 18(1) SA Representations: Statutory Consultees

STATUTORY CONSULTEES AND KEY CONSULTATION BODIES					
	ID Consultee	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
7	**DLP1040 Network Rail**	**General**	One of the most sustainable locations for housing provision is around transport nodes, such as railway stations, and the Council should give due consideration to these opportunities. Network Rail can support the Council on this should assistance be sought. Additionally, it is vital that the transport infrastructure required to support the level of growth that Wealden need to plan for is fully considered and is identified as a key priority for the Plan.	Noted. Growth Options and Site allocations to be reviewed in this context.	**Will be reviewed as part of the emerging proposed spatial development strategy**
		Development Growth Land West of Uckfield	Network Rail notes the proposed growth within the District and the anticipated delivery of a significant proportion of housing growth around Hailsham, with reducing quantum at the other Parishes. It is expected that Uckfield would be identified for a significant amount of development. Notes the potential for the site at Land West of Uckfield to be taken forward. The site is within a reasonable distance of Uckfield railway station and, whilst at present there is a limited direct route, opportunities exist to better connect through to the railway station. As part of the work being undertaken, network Rail would encourage inclusion of improved pedestrian and cycle routes over the A22 to better connect with Uckfield and provide access to the railway station. The inclusion of a mobility hub within the site boundary could provide access to active travel modes and travel information to facilitate improved access to the railway station.	Site allocation to be reviewed	**Review SA**
		Ashdown Business Park	Notes the potential for the site at Ashdown Business Park to be taken forward. A means of better connecting the site with Uckfield Railway would encourage greater active travel and support sustainable transport options.	Site allocation to be reviewed	**Review SA**
		Sustainable Transport Modes	Network Rail is actively working with local stakeholders on the concept of the 'First & Last Mile', looking at how users and potential users can better access the railway in Network Rail's Southern Region. The study focuses on the interaction of bus, cycle and road infrastructures with the rail network to assess how best the rail and wider transport system may fit together in the future. This would provide better first and last mile connectivity for customers, support an integrated transport network, and encourage modal shift from road to the cleaner transport provided by rail. Network Rail welcomes the opportunity to work with the council in developing sustainable transport plans going forward.	Noted	**None**
		Site Allocations	Proposed allocations BE1 and BE2 should take into account the potential impacts on the level crossing both in terms of usage of the crossing for access and proximity of the developments. Network Rail can work with the Council and site promoters to ensure that the safety risk is minimised as much as possible. Proposed site allocation POL7 should consider station car parking and the potential impacts on the level crossing at the station. The amount of development proposed could also be further maximised. Proposed site allocations that interact with the railway in either proximity or crossing the railway through increasing use should take these into account and consider them as part of any subsequent Policy supporting the relevant allocation. Network Rail will work with the Council to develop an approach that satisfies public safety and does not cause adverse impacts on the railway.	Site allocations to be reviewed	**Review SA**

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STATUTORY CONSULTEES AND KEY CONSULTATION BODIES					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
9	**Pevensey & Cuckmere Water Level Management Board**	**Flood Risk**	There are some long-term flood risk issues within the WLMB's catchment that need to be noted. The WLMB's and EA's pumps serving the Pevensey Levels east of Hailsham are nearing the end of their design life. The WLMB and the EA are working together in trying to secure funding for the replacement of these pumps. The Environment Statutory Allowance that would ordinarily fund infrastructure in protected sites is over subscribed. As a result, it is unlikely that funding to replace these pumps will be secured. The WLMB does not have sufficient resources to fund the replacement of these pumps. If the pumps are to fail, it is most likely that flood risk to areas of Hailsham, Polegate and Herstmonceux will be increased, which is likely to have a significant impact on the flood risk of existing and future properties in the area.	Noted. SFRA to be reviewed addressed in relevant chapter of Local Plan	**Review SA and relevant policies in the Local Plan**
8	**Pevensey & Cuckmere Water Level Management Board**	**River Cuckmere**	The River Cuckmere is also heavily silted downstream of the A27, which affects its ability to convey flows from the catchment effectively. This has an impact on the water levels within the river upstream, subsequently affecting the effectiveness of drainage systems to discharge their surface water into the main river. As far as we are aware, the EA does not have any plans to change its strategy for the River Cuckmere. Given the amount of development proposed within its catchment, it is worth noting that there is high likelihood of increasing flood risk within the catchment, especially on drainage systems and small drains/ watercourses that discharge into the Cuckmere. This is also likely to have a significant impact on the flood risk to the road network serving the settlements in the Lower Cuckmere. Consequently, it is advisable to have an evidence based approach that considers the Cuckmere as a catchment, to better understand the flood risk impact of actions within the District.	Evidence base to be reviewed and any impacts in relation to SA addressed	**Review SA and relevant policies and proposed site allocations in the Local Plan**
9	**South East Water**	**Water Resources**	Based on SE Water's Water Resources Management Plan 2024, SE Water is confident that their plans accommodate a level of growth discussed with the Council in recent years (although final refinement may be required) to ensure that sufficient water is available within the local area to meet a supply-demand balance. The interventions SE Water will deliver to meet this balance are a mix of new water supplies and demand management initiatives. As applications are made through the developer enquiry process, SE water will work with WDC and developers to carry out the appropriate detailed network modelling assessments, to ensure that any necessary infrastructure reinforcement is delivered (to move water to where is needed at a development level) ahead of the occupation of development.	Noted	**None**

APPENDIX 3: Regulation 18(1) SA Reps: Duty to Co-operate Partners

DUTY TO CO-OPERATE PARTNERS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
1	**Eastbourne Borough Council**	**Spatial Strategy**	Concerned about the infrastructure requirements that will be placed on Eastbourne and the mitigation needed.	Growth Options and Spatial Strategy to be reviewed	**Review SA of Growth Options**
		Housing Need	Require further explanation on why WDC cannot meet their housing need	Housing need to be reviewed in the light of proposed changes to NPPF and new guidance.	**Review SA of Growth Options**
		Gypsies and Travellers	No site specific site allocations have been proposed. Eastbourne has limited scope for provision of need - 3 sites and would welcome discussions	Provision to be reviewed and formalised at the next stage of the Local Plan	**Review SA and Local Plan proposed site allocations**
		Strategic Employment Allocations	WDC has only identified land to deliver 84,850 sqm of need (c.45%) Eastbourne can also not meet need and has identified a shortfall of around 23,000 sqm. EBC would welcome the consideration of further employment development sites within the Eastbourne and South Wealden Functional Economic Market Area. Particular attention will need to be given to transport impacts and access to public transport and other sustainable modes.	Provision to be reviewed.	**Review SA and Local Plan proposed site allocations**
		Climate Change	EBC is concerned that there is no reference to the impact of transport, particularly the use of the private car and the need for modal shift, within the 'Mini Vision and Objectives', particularly the vision for 'Responding to the Climate Crisis'. EBC considers that this is particularly relevant given the spatial strategy of focusing growth on edge of major towns that lie adjacent to the district such as Eastbourne, where there are consideration opportunities for reducing need to travel and facilitating a modal shift.	Vision and objectives to be reviewed	**Review SA**
		Housing Density	Given the failure to meet housing need, suggest densities should be reviewed with regard to increasing supply of homes	Housing need and proposed policies to be reviewed in the light of proposed changes to NPPF and new guidance	**Review SA of Growth Options**
		Infrastructure	EBC notes the reference to wastewater treatment infrastructure in Policies INF4: Utilities, and NE13: Water Environment and Water Infrastructure. EBC has concerns regarding the capacity within the local network to get the wastewater to the Wastewater Treatment Works (WTW), and improvements and reinforcements are required to ensure that sewage does not discharge into the sea. EBC consider that the limited headroom capacity and inability to expand at Eastbourne WTW means that development in south Wealden should be encouraged where possible to connect to other WTWs instead of Eastbourne.	Capacity of WTW to be reviewed in relation to development in south Wealden and any cross boundary implications of infrastructure provision.	**Review SA**

APPENDIX 3: Regulation 18(1) SA Reps: Duty to Co-operate Partners

DUTY TO CO-OPERATE PARTNERS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
2	**East Sussex County Council**	**Transport**	Suggest revisions of the text to the Transport and Accessibility section of the Local Plan	Review any changes to Transport Policies	**Review SA**
		Vision and Objectives	Additional references are needed with regard to sustainable and active travel, climate change and health	Review proposed changes	**Review SA**
		Spatial Strategy	Amend in relation to transport routes and wording of text	Spatial strategy to be reviewed in relation to proposed changes to NPPF and new guidance	**Review SA**
		Infrastructure	Suggests amendments to the wording of the infrastructure text	Review proposed changes	**Review SA**
		Design	Suggest amendments to text in relation to Policy DE3 and healthy streets	Review proposed changes	**Review SA**
		Site Allocations	Suggest changes to supporting text of Local Plan in relation to transport assessments and requirements	Review proposed changes	**Review SA**
		Coast Path	The King Charles III England Coast Path National Trail Southeast Section has not been referenced. Propose the inclusion of a Coastal Access Policy.	Review proposed policy	**Review SA**
		Climate Change and Health	Changes are proposed to strengthen the text in relation to climate change and health, including the use of HIAs and designing spaces to promote good health.	Review proposed changes	**Review SA**
		Open spaces	The policy criteria on safe, accessible, and inclusive facilities should be expanded to include developments having regard to guidance on Safer Parks and Inclusive Spaces and Places for Girls and Young People	Review proposed changes	**Review SA**
		Monitoring	Additional climate change and public health indicators should be included in the monitoring section to measure and assess the impact of Policy SSS and the policies within Chapter 5 Climate Change	Check LP monitoring framework reflects SA indicators on climate change and health.	**Review SA indicators**
3	**Kent County Council**	**Infrastructure**	Asks that cross boundary matters are addressed at this early stage to ensure that adequate infrastructure is available to support new and existing communities within Wealden and Kent.	Noted.	**Review SA**
		Highways and Transport	There are a number of development parcels included within the consultation, which both separately and cumulatively will impact on the Kent highway network. Transport evidence should include the impact of the development in Kent and particularly in the neighbouring Tunbridge Wells borough. Any mitigation should be agreed with the County Council. Consideration should also be given to the Kent PRoW network particularly the site allocations at Frant and Groombridge	Noted. Transport evidence to be updated and site allocations at Frant and Groombridge to be reviewed.	**Review SA**
		Education	For sites adjoining Tunbridge Wells specific requirements for education impact to be assessed should be included and mitigation agreed with KCC.	Noted. Sites adjoining Tunbridge Wells to be reviewed	**Review SA of sites**
4	**Lewes District Council**	**Spatial Strategy**	Welcome the opportunity to continue to work with WDC to understand any cross border implications of development, particularly those allocations affecting the A22, A272 and A26 transport corridors to the west of Uckfield and to the south of Maresfield. Concerned about the implications of potential development to the west of Uckfield on the A22/A26 junction.	Noted. Spatial Strategy to be reviewed in light of the proposed changes to the NPPF and new guidance	**Review SA**

APPENDIX 3: Regulation 18(1) SA Reps: Duty to Co-operate Partners

DUTY TO CO-OPERATE PARTNERS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
5	**Mid-Sussex District Council**	**Cross Boundary Issues**	At the start of 2024 the Council undertook its Regulation 19 consultation on the Mid Sussex District Plan 2021-2039 and anticipate submission this summer. There are five key potential cross boundary matters; Transport; Infrastructure; Housing; Gypsy and Traveller accommodation; and Ashdown Forest.	Noted.	**None**
		Transport and Infrastructure	It is noted that with the potential additional strategic employment allocation (Ashdown Business Park, Maresfield), further highways testing work is required. This is supported given the potential impacts additional development could have on the A22 which intersects the north east corner of Mid Sussex district. Wealden will need to ensure that any infrastructure required to support its growth is properly planned for and delivered, particularly in terms of its location and timing.	Noted. Spatial strategy to be reviewed at the next stage of the Local Plan in light of proposed changes to NPPF and new guidance. Highway modelling will need to be undertaken.	**Review SA**
		Housing Need	MSC's submission draft District Plan 2021 - 2039 indicates that the Council can meet its housing need in full with an over-supply of 996 dwellings for resilience and contribution towards unmet need arising in the area. The Council's submission draft District Plan indicates that the Council can meet its housing need in full with an over-supply of 996 dwellings for resilience and contribution towards unmet need arising in the area. Any oversupply will be prioritised for the Northern West Sussex HMA.	Housing Need figures will be reviewed as part of the Spatial Strategy in light of the proposed changes to NPPF and new guidance	**Review SA**
		Ashdown Forest	Ashdown Forest is a strategic matter for both Councils and there are arrangements in place to ensure due consideration is given to issues affecting Ashdown Forest. It is considered that Policy NES: Ashdown Forest SPA, supported by a Habitats Regulations Assessment (HRA), aligns with the strategic solution and the approach taken by Mid Sussex District Council.	Noted.	**None**

APPENDIX 3: Regulation 18(1) SA Reps: Duty to Co-operate Partners

DUTY TO CO-OPERATE PARTNERS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
6	**Rother District Council**	**Cross Boundary Issues**	RDC is unable to meet its own housing needs (as identified in the Rother Local Plan (2020-2040) Regulation 18) and as it needs flexibility in its policies to allow for an uplift in employment land delivery, RDC is unable to assist with unmet need at Wealden. RDC aims to progress to Reg. 19 in Spring 2025 with submission proposed in June 2025.	Noted	**None**
		Transport	RDC welcomes the opportunity to work together on transport issues and cumulative impacts on the key routes within the transport network such as the A259 Strategic Road network and other secondary routes into Bexhill and northern Rother.	Noted.	**Review SA**
		Coastal Management	Not currently reference in WDC's Plan	Noted. To be reviewed. This policy area will be prioritised alongside the Water Cycle Study work as the Local Plan progresses	**The next version of the SA will include an assessment of any new planning policies areas**
		Pevensey Levels hydrological catchment	Figure 16 within the WDC Local Plan, differs from that which has been identified in Rother's Habitats Regulations Assessment in support of the Rother Local Plan 2020-2040 Draft (Regulation 18) Version (April 2024). RDC believes that WDC has identified the operational catchment, which is a larger area than the hydrological catchment. This would reduce the area of Wealden district that is impacted by the proposed revised sustainable drainage policy in relation to the Pevensey Levels.	Noted. To be reviewed	**Review SA**
7	**Seven Oaks DC**	**Housing need**	Unable to assist in meeting WDC's need as there is a possibility that SODC cannot meet own need requirements.	Noted	**None**
8	**South Downs National Park Authority**	**Cross Boundary Issues**	SDNPA's strategic cross-boundary priorities as a framework for future discussions include: • Conserving and enhancing the natural beauty of the National Park and its setting • Nature recovery and making nature bigger, better and more joined up • Mitigation of and adaptation to climate change • New homes incl. traveller accommodation & affordable homes for local communities • The local economy and jobs particularly in land management and visitor economy • Sustainable travel into and across the SDNP • Green and grey infrastructure serving communities in and around the SDNP.	Noted	**None**
		Spatial Strategy	The draft spatial strategy seeks to protect the setting of the SDNP, which is welcome. Request specific reference is made to the duty to seek to further the purposes of the of the National Park as required by the National Parks & Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023. The strategic employment allocation to the south of Hailsham (Policy SS6). Careful attention should be given to massing, roof design and lighting to minimize any potential impacts of development at this location.	Noted. To be reflected in the review of the Spatial Strategy	**None**
		Policy NE8 Setting of the SDNP	Recommend the policy wording is revised to reflect NPPF para. 182 that development within the setting of the SDNP must be sensitively located and designed to avoid or minimise any adverse impacts on the SDNP.	Noted. Policy wording to be reviewed.	**Review SA**

APPENDIX 3: Regulation 18(1) SA Reps: Duty to Co-operate Partners

DUTY TO CO-OPERATE PARTNERS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
9	**Surrey County Council**		No Comment	Noted	**None**
10	**Tandridge Council**	**Cross Boundary Issues**	The Council is unable to help WDC meets its housing need due to its inability to meets its own need due to the constraints for the District.	Noted	**None**
11	**Tunbridge Wells Borough Council**	**General**	No specific comments to make on the SA. WDC have taken into account a number of the comments that TWBC made at the SA scoping stage. The only minor point is an error on a table of policies with the options and reasons for selection/rejection, where the options and reasons for the G&T accommodation needs policy discusses employment floorspace rather than G&T needs.	Noted. Amend table	**Check and amend**
		Vision & Objectives	Object to the vision and objectives because they are predicated on the provision of infrastructure, education, leisure, retail, transport water and sewerage systems from Kent and TWBC for large parts of the strategy, which could be unachievable and unsustainable.	Noted. To be reviewed.	**Review SA**
		Spatial Strategy	Strongly object to the Spatial Strategy and the allocation of 457 dwellings adjacent to the boundary with Tunbridge Wells, which in effect should be contributing to TWBC's unmet housing need.	Spatial Strategy to be reviewed in the light of the proposed changes to the NPPF and new guidance	**Review SA**
12	**West Sussex County Council**	**Development Growth Assumptions**	WSCC considers that proposed development in Wealden may have an impact on roads within West Sussex, which has not yet been fully assessed. There is a need for WDC to provide additional information or undertake further technical work to address these concerns in order to avoid an objection from WSCC at later stages of the plan-making process. Clarification is needed on the assumptions used to develop the growth scenarios and the transport evidence used.	Noted. WDC is aware that further transport modelling will be required. The Spatial Strategy and growth options will also be reviewed as a result of the proposed changes to the NPPF and new guidance	**Review SA of Spatial Strategy and Growth Options**
		Cross Boundary Highway Impacts	The Local Plan proposed development sites could result in a number of additional vehicles on cross-boundary roads that could exceed the thresholds that potentially trigger the need for a junction capacity test within a Transport Assessment. To avoid objections to the Local Plan at Regulation 19 and Submission WSCC officers consider the Local Plan evidence base should assess impacts on the adjoining West Sussex highway network. It should identify whether any severe impacts may occur, then if required, once private vehicle movements have been minimised, what deliverable mitigation measures could be bought forward as development takes place. Once identified, these measures should be specified in the Infrastructure Delivery Plan.	Noted. Transport evidence and Site Allocations to be reviewed	**Review SA**

APPENDIX 3: Regulation 18(1) SA Representations: Town & Parish Councils

TOWN AND PARISH COUNCILS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
1	**Buxted Parish Council**	**Site Allocations BU1, BU2, BU3, BU4, BU6, BU7**	Provide comments on the suitability of the Site Allocations in Buxted. Questions the reasoning for the rejection of sites in the SHELAA which appear more suitable for development	Proposed Site Allocations to be reviewed	**Review SA of Sites**
		Sites north Uckfield, and Ashdown Business Park	Questions suitability of sites selected	Proposed Site Allocations to be reviewed	**Review SA of Sites**
		Spatial Strategy	This strategy will destroy north Wealden, there is little or no empathy with this historic landscape. Development should be focussed in those areas that already have the infrastructure and, in the past, targeted for development and possibly that landscape has already been destroyed	Spatial Strategy and Growth Options to be reviewed in light of proposed changes to NPPF and new guidance	**Review SA of Spatial Strategy and Growth Options**
		Strategic Employment Allocations	Object to an extension of Ashdown Business Park to the equivalent of 96 football pitches. It is understood that this would provide a lot of employment opportunities, but an extension of this site in this location is unwarranted.	Noted. All proposed site allocations to be reviewed	**Review SA**
2	**Chalvington With Ripe Parish council**	**Initial Sustainability Appraisal-Appendix A11d -SHELAA Ref:345/3230** **SITE: Follengers Field, Church Lane, Ripe**	The Parish Council agrees that 'The site is rejected for allocation because development here would have a significant adverse effect on the established settlement character of Ripe, the surrounding listed buildings and the Ripe conservation area. Additionally, the poor public transport services for Ripe will require the use of private motor vehicles to access services and facilities due to the limited availability of these within the village.' The Parish Council disagrees with the statement that 'development along the frontage part of the site along Church Lane may be suitable as sufficient scope exists to mitigate any impact development would have on the wider landscape.' This is patently incorrect Chalvington & Ripe is classed in the draft Local Plan as a Type 6 settlement (residential settlement), one with few or no facilities and services, and where further development would be unsustainable. There are no health service facilities in Chalvington & Ripe. Most importantly the open space that is so valued by the community for its amenity value will be lost, along with the long distance views across ground gently rising towards the High Weald. Any development of this open green space will go against the principle of preserving and enhancing the character of the conservation area.	This will be taken account of in the review of the SHELAA.	**Review SA of Site**
3	**Chiddingly Parish Council**	**Site Allocations**	As Chiddingly has not been singled out for specific housing allocations, the main concerns are regarding developments around the Parish boundaries. At the north end of the parish, the SHEELA identifies residential development at Sanctuary Farm (if associated with Coxlow Farm development). Similar allocations- areas of development in East Hoathly and along Chiddingly Road/Horam Flat in Horam are of concern. There is a lack of infrastructure and, in the case of the Horam sites, they are too far from essential services, not within walking distance of anywhere or public transport. Due to the location of the Horam sites, there will be a substantial effect of traffic on narrow country lanes.	**Noted.** The Transport Assessment will assess the wider impacts on the transport network and identify appropriate mitigation where required**.**	**Review SA Site Allocations**
4	**1354467 Crowborough Town Council**	**General**	The council is keen to encourage the reuse of site materials and to retain historical connections. It is supportive of the rejection of the old Police Station under the SHLAA as it is a valued historical asset in the town but would like to see this policy extended to other sites with historical connections such as Willetts House (formerly Pilmer House).	**Noted**	

APPENDIX 3: Regulation 18(1) SA Representations: Town & Parish Councils

TOWN AND PARISH COUNCILS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
5	**East Hoathly with Halland Parish Council**	**Owlsbury Development**	With regards to the proposed Owlsbury development, it is on the wrong side of the A22 and will create a separate community from Uckfield with the geographical and physical separation creating a distinct dormitory community. Infrastructure, roads and public services cannot cope. The site is in open countryside; by the ecologically delicate water courses of the River Uck; in the Strategic Uck Valley Green Corridor; in a Biodiversity Opportunity Area; providing protected irreplaceable habitats; in a sensitive Landscape and is within 7km of the internationally protected Ashdown Forest. The development of 2,000 homes at Owlsbury Farm would undermine the Vision of the draft Local Plan for a sustainable future.	This will be taken account of in the review of the SHELAA.	**Review SA of Site**
		Ashdown Business Park	The Ashdown Business Park is too large for its sensitive ecological location with limited transport links. Business development needs to take place in Wealden. The location of the proposed Ashdown Business Park is not suitable due to the local traffic infrastructure and close location to the Ashdown Forest. The A272/ A22 and rural lanes will not be able to cope with the vastly increased traffic movements. The development would be car dependent. A scaled down version of the site would, however, be supported. Businesses need good transport infrastructure for movement of goods and employees and, as stated, our local roads cannot cope now.	This will be taken account of in the review of the SHELAA.	**Review SA of Site**
		Site Allocations EH1 to EH5	The A22 already experiences heavy traffic and congestion at key junctions, exacerbated by recent growth across the District. The Wealden Local Plan Shared Transport Evidence Base Dec 2022 states 'the traffic generated by the potential growth distribution would have the greatest impact on the A22, particularly in the single carriageway section north of Hailsham'. These site allocations will add to the issue.	The Transport Assessment will assess the wider impacts on the transport network and identify appropriate mitigation where required.	**Review SA of Sites**
6	**Frant Parish Council**	**Spatial Strategy**	Argue that the constraints posed by the District being an essentially rural district and the national designations afforded to much of it are the very reasons why significant growth cannot be accommodated without serious adverse impact, particularly the large housing allocations in the AONB. The overriding character, particularly of the north of the district, is rural. Planning for significant growth in this part of the district in order to respond to, in some cases, flawed baseline data or, in other cases, to advisory - not mandatory – government housing numbers, will fundamentally change the intrinsic rural character of the district and no amount of 'mitigation' will satisfactorily alleviate this.	Spatial Strategy and Growth Options to be reviewed in light of proposed changes to NPPF and new guidance.	**Review SA of Spatial Strategy and Growth Options**
		Site Allocations	Frant Parish Council, on behalf of the parish of Frant and its residents, **objects in the strongest planning terms** to the housing allocations in Frant parish proffered in the Draft Local Plan. FPC consider that in allocating for 477 new houses in the AONB on the seven FR sites, neither the objective of leaving the landscape for future generations is being met by Wealden DC and nor as a policy maker is it demonstrating or strengthening its appreciation of the AONB, but rather diminishing it. Consider the baseline assessment in SHELAA to be flawed and are not robust enough to be relied upon.	Evidence, SHELAA and SA proposed site allocations to be reviewed including cumulative impacts and identify any inconsistencies in assessments.	**Review SA of Site Allocations**

APPENDIX 3: Regulation 18(1) SA Representations: Town & Parish Councils

TOWN AND PARISH COUNCILS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
7	**Hailsham Town Council (Troy Planning)**	**General**	The Town Council, as custodian of Hailsham, aspires to change and development in Hailsham being the very best it can be for current and future generations, improving quality of life and environment for the benefit of all. It does not believe the Local Plan shares those ambitions. It contends that the Local Plan lacks vision and detail. It includes many generic policies and lacks information on specifics. This is crucial: the Local Plan envisages significant growth in and around Hailsham but there is no detail on what this actually means beyond the allocation of sites indicated on the policies map. The Local Plan does not include any site specific information nor consideration of town-wide matters, including the need for improvement in the town centre nor provision of new and improved infrastructure to cope with the demands placed on it by existing and future residents. Reference to the concept of the 20-minute neighbourhood is supported but has not clearly filtered through into the policies and the spatial growth strategy in the Local Plan. The Urban Capacity Study lacks credibility and cannot be relied upon. Further evidence is required on the sites identified, their suitability and deliverability.	These issues are to be reviewed as part of the next stage of the Local Plan which will develop the spatial strategy, policies and allocations put forward at the Regulation 18 stage.	**Review SA of Spatial Strategy, Policies and Site Allocations**
8	**Heathfield and Waldron Parish Council**	**Cross in Hand HEA1, HEA6, HEA9**	It is noted that the District Council thinks these developments could be deemed sustainable, but considerable attention will be required in terms of design and due to the high quality HNWL protected landscape locations, and impact on the landscape itself, not least in terms of **HEA1 & HEA6,** with prominent long views over the local landscape, with potential impacts on the landscape through lighting, residential activity, predation, etc., including substantial landscaping buffering for **HEA1 & HEA6.** The location of **HEA6**, with no road frontage, will bring development of that site into conflict with the HWNL policies and objectives, particularly those which are described on p26 of the HWNL Management Plan, the locality having a historic routeway built form. Although **HEA1** and **HEA 9** have road frontage, the site allocation numbers imply that backland development is also envisaged, which would also conflict with HWNL policies and objectives. **HEA9** potentially represents somewhat of an infill, but satisfactory access and highway screening will be paramount	This will be taken account of in the review of the SHELAA.	**Review SA**
		Heathfield HEA2	**HEA2** is within the High Weald National Landscape (AONB), and although it is acknowledged that it is a significant reduction in numbers proposed from the previously withdrawn Submission Local Plan, it is still in a prominent location in terms of landscape and streetscape, and makes a valuable contribution of undeveloped open space close to the Town Centre. It is also located at the busy junction of Tilsmore Road and Ghyll Road on a steep hill, with access certain to be on to Ghyll Road, (which has already been subject to not altogether successful traffic calming in view of the high volume& speed of traffic), and the potential of such impacts, not least in view of the proximity to the Cross in Hand CEP School, should be considered.	Review Site Allocation	**Review SA of Site**

APPENDIX 3: Regulation 18(1) SA Representations: Town & Parish Councils

TOWN AND PARISH COUNCILS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
8	**Heathfield and Waldron Parish Council**	**HEA3, HEA4, HEA5, HEA8**	**HEA3** was previously granted planning permission for the same number of houses proposed. Any development of **HEA4** needs to be carefully assessed against this location in the National Landscape (AONB). As well as Heathfield Park it abuts, and residential properties in Tower Street, either side of the access indicated to be gained. **HEA5** is well located in terms of existing residential development, not least Millennium Way, but will need to carefully designed and laid out so as to avoid adverse impacts on National Landscape (AONB) and Priority Habitats. Access could be an issue, and ideally combined with the existing Millennium Way development, subject to practicality. **HE8** will need to very carefully assessed, given the location in the National Landscape, (AONB), and potential impacts upon Ancient Woodland and Priority Habitats. Access will also be a key issue as also will be drainage & flooding, all of which have militated against any development being supported at this site previously. There are also clear potential issues of significant ground contamination on site as confirmed by Wealden/Rother HES.	Review Site Allocations	**Review SA of Site**
9	**Hellingly Parish Council**	**Spatial Strategy**	Whilst taking into account the natural restrictions to development in North Wealden, the level of development proposed to South Wealden is greatly disproportionate, even when taking into consideration those areas that could be developed in the North. Many settlements to the North have no development planned at all. Areas in the north are quite easily commutable to London, but the development is mostly concentrated to the south.	Review Spatial Strategy and Growth Options in light of proposed changes to NPPF and new guidance	**Review SA of Spatial Strategy and Growth Options**
		Employment Site Allocations	Consider the land at Cophall Roundabout should be considered for inclusion as an employment land allocation. The proposed Knights Farm strategic employment allocation has known constrictions with access to the A22 single carriageway which is already under significant pressure with the volume of traffic, especially at peak times.	Review Employment land Allocations	**Review SA of sites**

APPENDIX 3: Regulation 18(1) SA Representations: Town & Parish Councils

TOWN AND PARISH COUNCILS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
10	**Horam Parish Council**	**1062/3030 - Land Adjoining Discovery Way and Village Hall Horam.**	This site is subject to conditions as part of the Merrydown development (WD/2011/2817/MAJ). The area has an existing status as a habitat creation area. It contributes to the setting of the adjoining formal Recreation Ground, as well as to the recent Marrydown site development. It is classified as an accessible Natural Green Space in Wealden's Open Space Study and forms part of the green corridor extending along the A267 on approach into the village. It is considered that the current Sustainability Appraisal for this site 1062/3030 is flawed and that this site should not be included in the Local Plan as an allocated site.	Review Site Allocation	**Review SA of Site**
		920/3030 - Land at Great Easterfield, Chiddingly Rd, Horam, TN21 0JJ.	Development of this site should not be included in the Local Plan as an allocated site unless it can be clearly demonstrated that additional dwellings can be built without demolishing this historic farmhouse.	Review Site Allocation	**Review SA of Site**
		960/3030 - Clearview Farm, Chiddingly Road, Horam.	Development on this rural site is unsustainable and should not be included in the Local Plan as an allocated site.	Review Site Allocation	**Review SA of Site**
		875/3030 - Coxlow Farm, Horam Road, Horam.	It is clear from comparison of WDC's 'wished'/subjective view of Sustainability and the HPC 'lived'/objective view of Sustainability of Horam that there is a huge discrepancy.	Review Site Allocation There is a clear methodology for assessing sites in the SHELAA in line with national planning guidance, as well as a clear methodology for the SA as set out in the Scoping Report.	**Review SA of Site**
11	**Isfield Parish Council**	**Spatial Strategy**	The Spatial Strategy does not appear to give adequate recognition to the rural nature of the District: 1. Town centre services are largely to be found in the towns surrounding Wealden (Tunbridge Wells, Brighton, Eastbourne etc) which also provide access to national and regional public transport systems. 2. Uckfield has very limited rail links (and it is not that infrequent that trains returning from London terminate at Crowborough or Oxted, leaving Uckfield passengers stranded) and is not connected to the Strategic Road Network; in fact, the only part of the SRN in Wealden is the A27 around Eastbourne. 3. Logic would therefore suggest that any additional employment land or large scale housing development should be in the south of the District, near Eastbourne, where it would link in to the SRN and rail network. 4. The north of the District (including Uckfield) has a more sensitive landscape character than the south, particularly related to the Ashdown Forest. It follows therefore that major land allocations in the north would cause more biodiversity harm than in the south.	Spatial Strategy and Growth Options in light of proposed changes to NPPF and new guidance	**Review SA**

APPENDIX 3: Regulation 18(1) SA Representations: Town & Parish Councils

TOWN AND PARISH COUNCILS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
11	**Isfield Parish Council**	**Land west of Uckfield - Owlsbury Farm**	This development would have substantial adverse impacts. The adverse impacts of developing this as a residential site would far outweigh any potential benefits, and would be contrary to the relevant provisions of the NPPF and the principal vision and objectives of the Draft Local Plan.	Site allocation to be reviewed	**Review SA of Site**
		Strategic Employment Allocations	Question whether any additional site allocation is justified or necessary. Any additional substantial employment space should not be allocated in the North of the District particularly due to traffic conditions, the A 22 around Uckfield being near capacity.	Site allocation to be reviewed	**Review SA of Site**
		Ashdown Business Park	Oppose any expansion of this site. It is not proven anyway that expansion is necessary, as existing employment space built out and still to be developed is already sufficient	Site allocation to be reviewed	**Review SA of Site**
		Site Allocations	IPC is broadly in agreement with the allocations within the Parish. However, question some of the numbers proposed in various locations, including Little Horsted, Isfield and Horam	Site allocations to be reviewed	**Review SA of Site**
12	**Little Horsted Parish Council**	**Land at and west of Owlsbury Farm ,Pond Lane, Little Horsted**	Oppose the proposed development of the site for the following reasons: 1. Traffic, Infrastructure and Scale of proposals 2. The Land involved is subject to flooding - both rivers now flood on a regular basis threatening Isfield and neighbouring downstream villages. 3. Protected Wildlife - It is a comparatively small area which is extraordinarily rich in biodiversity	Site allocation to be reviewed	**Review SA of Site**
13	**Ninfield Parish Council**	**Site Allocations**	We do not support the site allocation for 20 houses in Ninfield. This has been deemed inappropriate in previous local plans as it is a site of special scientific interest. The loss of the wildlife area alongside the water tower is not replaceable in that part of Ninfield. It does not fit with the policies of protecting and enhancing sites as this site should be protected in entirety.	Site allocation to be reviewed	**Review SA of Site**
14	**Pevensey Parish Council**	**Proposed site allocations WES5, 6 and 7**	Consider that three new large allocations in this area are not appropriate for historic and infrastructure reasons and object to WES 5; WES 6 and WES 7Consider that WES 7 (land at Peelings Lane) should be removed from the plan for the following additional reasons. - The site cannot achieve a suitable vehicular or pedestrian access and will result in a significant number of additional cars on the road despite the limited services and facilities within Westham and will result in reliance on the private car to access higher order services and facilities. It cannot be concluded, as the Sustainability Appraisal purports to do, that the development of the site will not have a major negative effect given the above harms identified and the absence of an appropriate evidence base on a number of important matters. The conclusion that identified harms can be adequately mitigated is unjustified given the lack of evidence and is merely speculation.	Proposed site allocation to be reviewed as well as the SA Assessment	**Review SA**
		Spatial Strategy	Given the 4,000 dwelling shortfall that the District is facing the evidence base should have a fully worked up Strategic Flood Risk Assessment for the area within the Development Boundaries for Pevensey and Pevensey Bay in order to demonstrate whether development should be permitted within the Development Boundary given the inability to meet development needs elsewhere and the need to ensure the sustainability of Pevensey and Pevensey Bay villages. This omission should be remedied and further reinforces the need for specific chapters on the market towns and villages in the District, including Pevensey and Pevensey Bay	These comments will be considered as part of the spatial development strategy for the Local Plan.	**Review planning policies and spatial development strategy**

APPENDIX 3: Regulation 18(1) SA Representations: Town & Parish Councils

TOWN AND PARISH COUNCILS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
15	**Westham Parish Council**	**109/1620 Land to the East of Golden Jubilee Way, A22, Westham**	The site is not considered suitable for development/inclusion in the Local Plan because of impact on the landscape. However, the site would seem to me to be the 'least worst' of larger scale development in the parish. It is bounded by the A22 Jubilee Way and newly built housing off Dittons Road and maintains the area of development as south of the A27 trunk road, being one of the few remaining green areas between the railway line and Dittons Road/Rattle Road.	Site Allocation to be reviewed	**Review SA**
		529/3280 Dittons Nursery, Dittons Road, Stone Cross	As the site is south of the A27 trunk road, development of the site would not be out of keeping with other development sites in Stone cross and Westham.	Site Allocation to be reviewed	**Review SA**
		675/3360 1025/3280	Agree allocations are suitable	Noted	**None**
		745/2070 786/2070 1132/3280 Stone Cross	Disagree. The number of homes proposed would have a massive impact on the countryside north of the A27 trunk road, which currently forms a barrier between the built environment to the south and the rural environment that is the outer edge of Pevensey Levels. There would be significant run-off from this scale of development into the water courses that feed into Pevensey Levels, which would lead to contamination of this RAMSAR SSSI. This large scale development, north of the A27 trunk road, would have significant impact on the visual amenity of countryside that separates Eastbourne from Hailsham.	Site Allocations to be reviewed	**Review SA**
		944/2070 Land to the West of the B2104, Hankham	Disagree. This site would be unsuitable for housing due to the immediate proximity of the A27 trunk road and associated noise and air pollution. Traffic leaving the site would add to the congestion in the area. The exit point has limited visibility to the south, and there have been recent traffic collisions as a result of this.	Site Allocation to be reviewed	**Review SA**
		1153/3280 Stone Cross	Disagree. The number of buildings proposed seems excessive in relation to the size of the site. This amount of development would alter the character of the area significantly.	Site Allocation to be reviewed	**Review SA**
		1187/3280 Stone Cross	Any development on this site should NOT include vehicle access to Hailsham Road.	Site Allocation to be reviewed	**Review SA**
		WES4 – 6 Access problems.	Concerned that the cumulative impact of the total number of proposed developments and consequent increase in traffic along Hailsham Road, Rattle Road and Dittons Road and subsequent congestion at the Red Lion junction, Hailsham end of Ersham Road and junction with Golden Jubilee Way have not been fully considered.	A Cumulative Impact Assessment was undertaken (Appendices for Site Assessments and Appendix 13). The cumulative impacts will be reviewed and revised at Regulation 19.	**Review SA Cumulative Impact Assessments**
16	**Withyham Parish Council**	**Site Allocations**	Object to the site at Little Wold (reference WIT 1) being listed as a development site. Following the applications and subsequent appeal being refused at WIT 1 and taking into account the strong public objection to the applications, request Wealden reconsider the validity of including this site as a development allocation. Should this site remain within the proposed new development boundary expect it to be subject to the full range of legislative protection afforded to a site within the National Landscape (previously designated as Area of Outstanding Natural Beauty). Likewise, although the site at Cooks Corner in Crowborough will also fall within the new proposed development boundary, would again expect that the full range of legislative protection afforded to a site within the National Landscape (previously designated as Area of Outstanding Natural Beauty).	Review Site Allocation WIT1	**Review SA**

APPENDIX 3: Regulation 18(1) SA Representations: Organisations

ORGANISATIONS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
1	**Cross In Hand Amenities Society**	Sites HEA1, HEA6 and HEA9	The Society is tasked with protecting, preserving and maintaining the amenities of (Heathfield &) Waldron within which sites HEA1, HEA6 and HEA9 are located within Cross in Hand, itself within the High Weald National Landscape. Both HEA1 and HEA6 are part of the green space within the heart of the settlement. HEA1 and HEA6 adjoin the historic ridge top along which Cross In Hand has developed. HEA1 should only be capable of frontage development along the B2101 to a limited extent so as to avoid loss of the green space at the heart of the settlement. HEA6 is wholly contrary to the characteristics described in the Plan and development of that site should, for that reason alone, not take place. In the case of HEA9, built form should be limited to the road frontage to the A267 with the site allocation being amended accordingly.	Sites HEA1, 6 and 9 to reviewed The SHELAA will be reviewed as part of the next stage of the Local Plan	**Review SA of Sites**
2	**Eastbourne Eco Action Network C.I.C.**	**Monitoring**	There appeared not to be anywhere to add comments to monitoring. The targets having words like increase /decrease etc and are not SMART. It needs real stated targets, ideally with %ages, and review periods.	There was not a specific question related to the monitoring framework, but these points have been noted and will be reviewed as the Local Plan progresses.	**No action for the SA**

APPENDIX 3: Regulation 18(1) SA Representations: Organisations

ORGANISATIONS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
3	**Grosvenor Property UK Limited**	**Spatial Strategy and Growth Options**	Grosvenor supports Options A and E which focus on high levels of growth around sustainable settlements, including Hailsham, to meet identified needs. Grosvenor also welcomes the approach of Options D and G which look to deliver growth through new strategic extensions, albeit both still fall short of the Standard Method requirement. It is noted that Option C has not been selected as, "due to the low level of housing supported… it is not considered to meet several objectives for the Local Plan" (Interim SA, paragraph N.25). Option C would deliver 15,000 homes. This is just 729 homes short of the target identified in the Draft Plan (which itself falls short of the Standard Method requirement). Grosvenor question how WDC can reasonably progress a plan which falls short of the identified housing requirement to the extent that the Draft Plan does, when its own evidence base indicates that the delivery of such low figures would fail to meet WDC's sustainability objectives. Grosvenor also question how the dwelling figures for each spatial option have been arrived at, as it is unclear which of the sites put forward for allocation were included within each of the spatial options. Indeed, preferred option F can deliver 15,750 dwellings, yet the actual target provided for in the Draft Plan is lower than this at 15,729 dwellings.	Housing figures and Growth Options to be reviewed in the light of new NPPF and government guidance.	**Review SA of Spatial Strategy and Growth Options**
		Site Allocations North West Hailsham – site reference 825/1310.	North West Hailsham is identified as a reasonable alternative. Grosvenor disagree with the conclusions of the SHELAA and therefore raise similar concerns with the assessment of these particular matters in the SA. Grosvenor agrees with the major positive and positive impacts identified in the SA. The impacts against the climate change adaptation (SO2), soil, land and minerals (SO5), waste (SO6) and digital infrastructure (SO12) are identified as 'uncertain' as the assessment was undertaken in the absence of detailed proposals for the Site, and mitigation measures were therefore unknown. The SA also finds negative effects relating to climate change mitigation (SO1), pollution (SO7), and landscape (SO10). Grosvenor has provided commitments to measures regarding the above issues, which should be taken into account in the SA.	Additional information provided on the proposals to be reviewed.	**Review SA of Site**
		Land at West of Uckfield	Grosvenor has reviewed the SA assessment of Land at West of Uckfield against the SOs and note that this site scores worse than North West Hailsham in relation to soil, land and minerals (SO5), waste (SO6), heritage (SO11) and sustainable travel and accessibility (SO13). Reflecting our comments on the Draft Plan, Grosvenor question why Land at West of Uckfield has been taken forward for inclusion in the Draft Plan and North West Hailsham has not, despite the latter scoring more favourably in the SA.	SA of Land West of Uckfield to be reviewed against North West Hailsham	**Review SA of sites**

APPENDIX 3: Regulation 18(1) SA Representations: Organisations

ORGANISATIONS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
4	**Parker Dann**	**Site Ref: 1102/1840 Land North of the A272, Buxted, East Sussex**	There is an inconsistency between the SHELAA and the Initial Sustainability Appraisal. The SHELAA identifies heritage as the “main constraint” but the Initial Sustainability Appraisal identifies something else entirely. The Council’s SA is deeply flawed. It fails to allocate Site Ref: 1102/1840 despite the site scoring more “Major Positive”’ results than any other site in Buxted with a total of four. The SA should be updated.	Sites to be reviewed	**Review SA of sites**
		Sites 975/3225 and 058/1990	Notably sites 975/3225 and 058/1990 are allocated despite not scoring any “Major Positive” results.	Sites to be reviewed	**Review SA of sites**
		Site Ref: 258/1210	The SA excludes the sites on the basis of Stage 4 of Site Selection Methodology. For Site Ref: 258/1210 this is on the basis of a moderate / high finding in the Landscape Sensitivity Assessment (2023). The Landscape Sensitivity Assessment itself does not seek to rule out development on these sites altogether defining moderate / high sensitivity as: “Landscape and visual characteristics/ values of the assessment unit are susceptible to change. The assessment unit may be able to accommodate the relevant type of development but only in limited areas or limited amounts without adverse change or significant effects.” The Landscape Sensitivity Assessment Residential and Employment Development fails to actually define what small scale / medium scale development actually is in relation to housing numbers, which then makes it difficult to apply the findings of the assessment to specific sites. The definition of small scale and medium scale given only relates to density rather than housing numbers.	Sites to be reviewed	**Review SA of sites**
5	**Persimmon Homes South East** (Judith Ashton)	**Growth Options and Housing Need**	Support the principle of the Spatial Strategy. Question the housing need figure used by the Council as it falls below the housing need. Also question the options considered for the Spatial Strategy and the evidence underpinning the assessment, particularly transport. Suggest that an option is included, which assesses the uncapped LHN and the provision of neighbouring authorities’ unmet need. Further evidence is required on the sites that have been rejected as unsuitable for residential development including the proposed housing trajectory for delivery and evidence on windfalls. Further evidence is also required on the proposed yields of site allocations and required infrastructure provision.	All Growth Options and Spatial Strategy to be reviewed in the context of the proposed revisions to the NPPF and new Government guidance on housing need, which will be subject to further SA.	**Review SA of Spatial Strategy and Growth Options**
		Growth Options	Growth Option E - the scale of the alleged major negatives is not known and could just as easily turn out to be minor negatives, which would be comparable to option F the chosen option. The overall assessment of growth option E appears negatively skewed and needs to be more balanced in its approach	All growth options to be reviewed as part of the Reg. 19 Local Plan.	**Review SA of Growth Options**
		Benhall Mill Road, Frant FRA / SHELAA site 063/1610	Support the allocation for development but concerned about the scale of development proposed given the site’s ecological sensitivities, the need to try and achieve 20% BNG and the likely impacts on viability. (see detailed report prepared by The-Ecology-Partnership-Ltd). Question the need for an alternative access arrangement.	SA Site assessment to be reviewed as part of the Reg 19 Local Plan.	**Review Site Assessment**

APPENDIX 3: Regulation 18(1) SA Representations: Organisations

ORGANISATIONS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
6	**Savills** (Mr Graham Wilson)	**Spatial Options - Objection**	The Spatial Option selected is Option F, which is identified as being an Option that will deliver 15,750 dwellings, which is approximately 4,000 dwellings short of the required level of provision, and also fails to meet the district's full employment need. It recognises that there are no major negative impacts for the spatial option, but there are minor negative impacts on a number of criteria. This Option presents significant shortfall in both housing provision and economic growth. Other options that seek a higher level of housing provision have also been found to have no major negative impacts. It is therefore unclear why Option F has been selected. Furthermore, given the identified housing need of other neighbouring Local Authorities, and the need to provide a buffer on the amount of homes WDC deliver, it does not seem logical as to why any of the Options that seek to deliver a greater number of dwellings than the amount calculated by the Standard Method has not been utilised.	All Growth Options and Spatial Strategy to be reviewed in the context of the proposed revisions to the NPPF and new Government guidance on housing need, which will be subject to further SA.	**Review SA of Spatial Strategy and Growth Options**
		SA Site Assessments Land South West of Ghyll Road, Heathfield Site 149/1210 and 547/1920	Site 149/1210 can be seen to have generated no Major Negative effects and found to generate four positive impacts (three of which are Major Positive). The minor adverse rating for SO4 Water Resources & Quality is objected to. The detailed description set out in Appendix a 11n identifies that owing to the site's size, there is considered to be a minor negative. As stated in the SA site assessment "There are no watercourses within the site or in close proximity". However, for all other Heathfield sites it goes on to state that "Therefore, potential for water pollution is minimal."	Site assessments 149/1210 and 547/1920 to be checked	**Review SA of Sites**
7	**Vistry Group** (Savills - Mr Graham Wilson)	**SA Site Assessments Land South West of Ghyll Road, Heathfield Site 149/1210 and 547/1920**	The site is in Flood Zone 1, with the lowest risk of surface water flooding, slopes downhill from north to south, and there is no watercourse in the vicinity of the site. Accordingly, the omission of the phrase "Therefore, potential for water pollution is minimal" should be included – as it is for all other sites - in the SA site assessment for Land South west of Ghyll Road. Furthermore, the development area of the site is estimated in the SHELAA site assessments to be 1.34ha. **Site 547/1920** (which is also a site allocation) has a greater developable area identified in its SHELAA assessment, but is assessed as being 'uncertain' in terms of impacts. Therefore the size of the developable area of the site would not appear to have been appropriately considered for Land South West of Ghyll Road, and the assertion that there will be minor negative effects would appear to be incorrect. There has also been no evidence provided as to how the site would result in negative impacts, beyond its size, therefore this judgement is disputed.	Site assessments 149/1210 and 547/1920 to be checked	**Review SA of Sites**
8	**Hertfordshire Holdings** (Tor & Co - Andrew Elliott)	**SA Site Assessments**	Given that the site allocations policies including draft Policy SA1 and SS6 offer little if any description of the nature of proposals envisaged for sites, we would question the value of the SA findings at this point. We have identified many inconsistencies in the way similar impacts have been assessed in respect of different sites and will comment further at Regulation 19 stage where inconsistencies remain.	Site assessments consistency to be reviewed	**Review SA of Sites**

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ORGANISATIONS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
9	**John Summers** (Trafalgar Group Limited - Guy Dixon)	**Spatial Options**	The SA considers all potential Strategic Allocations across Wealden including Land at Howard Close (Allocation HA7). The Site has no Major Negative effects. Of the 'Minor Negative' impacts identified, the impacts against SO1 (Climate change) and SO6 (Waste) are identified on all sites. The Spatial Option selected is Option F, which is identified as being an Option that will deliver 15,750 dwellings, which is approximately 4,000 dwellings short of the required level of provision, and also fails to meet the District's full employment need. Although the client is broadly supportive of Option F, the client considers more should be done to address the identified employment need.	All Growth Options and Spatial Strategy to be reviewed in the context of the proposed revisions to the NPPF and new Government guidance on housing need, which will be subject to further SA.	**Review SA of Spatial Strategy and Growth Options**
10	**Martin Grant Homes** (Turley - Mr Ryan Johnson)	**SHELAA Site 127/1410**	Specific site assessment matters and weightings in the SA are considered either factually incorrect, or in respect of the latter, have been inconsistently applied between sites proposed for allocation or discounted, and would benefit from updating. This includes: **Site proposals** (SA Appendices A10-A11L; p. 290): The site is assessed on the basis of a proposal for 300 homes, whereas the proposals are for around 240 homes, with associated SANG, public open space, landscaping and access. **See Document B**. The assessment of effects should be revisited with this revised scale of development. There are inconsistencies within the scoring of the sites which should be addressed.	Site assessment for 127/1410 and Horsted pond to be reviewed. Information in Document B to be considered and any inconsistencies reviewed/updated as appropriate.	**Review SA of Sites**

APPENDIX 3: Regulation 18(1) SA Representations: Organisations

ORGANISATIONS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
11	**Village Concerns** (Mr Jonathan Walker)	**Scoping Report**	It is disappointing that the Village Concerns comments on the Sustainability Appraisal Scoping Report were not included in Appendix 2 to the Initial Sustainability Appraisal Appendices A1 - A8 published March 2024. A copy can be provided if required	Scoping consultation responses to be checked for the response	
		SA Scoring	Questions the scoring method of the SA and its inability to show a mix of effects against issues, and therefore not reflecting the levels of uncertainty with impacts. Considers the responses are over optimistic	The requirement of the SA is to assess the **likely significant effects** of the proposals in a proportionate manner. Where uncertainty is identified it is noted in the results. The results draw on the evidence of the Local Plan to inform the results.	**None**
		BNG	The BNG concept is new and untested, the reliance on handing the construction of new biodiversity habitats to developers and house-builders is risky and unproven.	BNG is a mandatory requirement - Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).	**None**
		Spatial Options and Sustainable Settlements	A Spatial Option for the most sustainable settlements which would be Type 1 to Type 3 settlements should be examined. All the Spatial Options allocate growth to all sustainable settlements ie. Type 1 to Type 4 settlements. WDC should be faithful to Policy SS2. Spatial Option D examines but does not pursue all the development potential of the selected settlements. WDC should achieve the housing targets by building at significantly greater densities but do so in the urban centres that have the transport connections, services and facilities and where active travel can actually work.	All Growth Options and Spatial Strategy to be reviewed in the context of the proposed revisions to the NPPF and new Government guidance on housing need, which will be subject to further SA.	**Review SA of Spatial Strategy and Growth Options**
		Site Assessments	Not all the sites submitted in Halland are included (14 sites are missing, plus 1157/2030 Boyne and 060/1950 Moat Wood in East Hoathly). It also includes a SHELAA for one site that is not included on the WDC website (1202/1950 Old Whyly). The analysis of Site 773 is confusing as when it was assessed in 2017 it was subdivided into eleven parts 773/1950(1) to 773/1950(11). This included the land that is now the 205 home development and the 5 paddocks to the East of the village which are 773/1950(6) to (10).	The sites in question are included in the SHELAA report, but under unsuitable site summary in appendix 4 of the report and in on-line mapping. All sites to be reviewed as part of Local Plan and SA	**Sites to be reviewed**

APPENDIX 3: Regulation 18(1) SA Representations: Organisations

ORGANISATIONS					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
12	**Wates Development Asher Ross**	**Site 197/1310**	In terms of matters that are uncertain, measures to be developed through the application will ensure that these are not negative. For example, the site will provide a minimum of 10% BNG thus providing a minor benefit. The site falls entirely within Flood Zone 1. EA mapping notes that flood risk from groundwater and reservoirs is unlikely. No historical flooding has been recorded on the site by the EA. The masterplan would be designed to accommodate the existing Ordinary Watercourses and overland flow paths, which are noted to occupy only a small portion (c.10%) of the total developable area. Appropriate easements would be provided alongside the existing watercourses, these easements would be agreed with the LLFA and the Pevensey and Cuckmere Water Level Management Board (WLMB). Existing overland flow routes would be retained through the site, and surface water flood risk (pluvial) modelling would be undertaken to confirm no off-site increase in flood risk as a result of the development. Any required mitigation in relation to groundwater flood risk would be informed by groundwater monitoring. These measures are considered to mitigate the flood risk to the development and ensure no off-site impact would occur as a result of the proposals. A surface water drainage strategy would be developed, based on the use of Sustainable Drainage Systems (SuDS). This would be informed by infiltration testing and groundwater monitoring, and would be developed in consultation with the LLFA and WLMB. The SuDS Strategy would ensure runoff is restricted to greenfield rates, whilst also providing water quality, biodiversity and amenity benefits. Overall, we consider that there are no constraints to the delivery of the site and that development of the site will lead to numerous benefits.	Review site assessment 197/1310	**Review SA of Site**
13	**Westham Village -** Peelings Lane Laura Fraser	**Site 1099/3360 WES7 in Westham**	Strongly disagree with site for 151 houses being included in the Development Plan as totally inappropriate development alongside an Internationally Agreed Ramsar Wetland Site of Pevensey Levels Special Area of Conservation and the 1066 Walkway and in contradiction to WDC Policy NE13 Clause 5 Policy SO1 Climate Change Mitigation Major negative. The site area is 6ha not 32.49 ha and should be assessed as such. The site is not 'close' to Eastbourne, it is 5km distant necessitating substantial journey times for essentials. Although the bus service to Eastbourne is hourly, to Hailsham it is only 2 per day and no services on Sunday so car use is still required and preferred for heavy loads 300m to train station is INCORRECT, it is 1270m from the 6ha site centre by footpath route.	Review Site 1099/3360	**Review SA of Site**
		Sustainable Settlement	Site is not within the sustainable settlement of Westham but OUTSIDE as defined by previous Appeal Decisions. Promoter' s visions do not represent assurances, only Policies do that. Existing proposals commit the Pevensey Levels to yet more emissions being blown in on the prevailing wind from the large construction emissions and the lesser, but permanent, household emissions.		
		Sustainability Impacts	Considers the majority impacts of the development to be negative and the need for policies and mitigation measures to be strengthened on the majority of issues and to reflect the promoter's vision for 32ha site.		

APPENDIX 3: Regulation 18(1) SA Representations: Local Community

LOCAL COMMUNITY					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
1	**Mr Michael Mcloughlin**	**SA Appendices**	The Appendices to the Sustainability Policies in the Draft Plan do not fully recognise the potentially damaging impact on the local amenity and safety. The construction of 30 houses with access from New Road would result in significant additional traffic along New Road which is likely to undermine local amenity and local traffic safety. This would be to the detriment of existing residents. Measures to increase the traffic capacity of New Road, to ensure highway safety and to limit damaging environmental impact must be identified and examined before site allocation. On this basis I must object to the current allocation until all detail aspects of site access and traffic generation are considered and determined to be acceptable.	Site Allocation to be reviewed	**Review SA of Site**
2	**Rebecca Murphy**	**SHELAA site 62/2080 Land adjoining Hartfield Surgery**	I AGREE with the SA assessment that it is UNSUITABLE for allocation. This site is highly valued by the community. It has been defended robustly in previous planning application(s) leading to its withdrawal. I hope WDC will continue NOT to allocate this site in the final Plan. However, if you do reconsider it in a revised SA, could you consider adverse impacts carefully, including but not only: how its proximity to another allocated site would affect this small village and conservation area, the access so close to the Edenbridge Rd t-junction AND the High Street pinch-point, and also its importance to the community.	Comments noted	**None**
3	**Ms Jennifer Wakefield-Warren**	**General**	In some cases need to look more carefully at site allocations and in others tighten up loose language so words like ‘should’ are replaced with ‘must’ and or ‘will’ and a policy of enforcement where contraventions take place.	Comments noted	**Review SA**
4	**Mr David Marlow**	**Spatial Strategy**	The SA fails to consider a distinct, reasonable alternative spatial strategy that more appropriately differentiates between the greater sustainability of towns, as well as other locations accessible to higher order centres outside but connected to the district, relative to that villages in lower tiers in the settlement hierarchy. This fundamental omission is elaborated in my response to Q2. The Council should consider - and should promote - a strategy that gives more weight to the growth of urban centres and locations with good accessibility, notably by rail, to the main employment/service centres around Wealden. At the same time, rural villages should not be subjected to massive growth that will change their character as well as be relatively unsustainable, having regard to their position in the settlement hierarchy and access to employment/higher-order services. It is notable that the Sustainability Appraisal fails to consider such an option, which is not only a reasonable option, but I believe, a more sustainable one than that currently proposed. My full representation on this matter is contained in my ‘supplementary note’ provided under Question 92.	All Growth Options and Spatial Strategy to be reviewed in the context of the proposed revisions to the NPPF and new Government guidance on housing need, which will be subject to further SA. Review Sites 875/3030 AND 1062/3030.	**Review SA of Spatial Strategy and Sites**
		Site 875/3030 Coxlow Farm Housing	The SA “scoring” of Coxlow Farm (Ref. 875/3030) understates the negative impacts in several respects: - Landscape and Townscape impacts are regarded as ‘Major Negative’, rather than ‘Uncertain’, for the reasons set out in my response to Question 85 regarding the relevant site allocation (HOR6). The sheer scale of the proposal, wholly disproportionate to Horam, would not contribute to the “sense of place” within Horam. In this regard, it would be ‘Negative’. There has been no transport assessment to evaluate the impact of the development on the local junctions, which already have regular congestion. The recent Parish Housing Survey identifies only a small need for affordable homes in the Parish.	Review Sites 875/3030 AND 1062/3030.	**Review SA of Sites**

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LOCAL COMMUNITY					
ID	**Consultee**	**Issue**	**Summary of Comments**	**WDC Response**	**Proposed Changes**
4	**Mr David Marlow**		The scoring of Site Ref 1062/3030 - Land adj. Discovery way and Village Hall omits to refer to the fact that the site is required to be managed an informal open space, that it is proposed as a 'local green space' in the emerging (well-advanced) Horam Neighbourhood Plan. As such, its development should score 'Major negative' on criterion SO8 (Green Infrastructure), on criterion SO9 (Biodiversity), on criterion SO10 (Landscape and Townscape) and on criterion SO16 (Quality of Life and Place) Further explanation is contained in my representation on the relevant site allocation HOR1 in response to Question 85.	Review Sites 875/3030 AND 1062/3030.	**Review SA of Sites**
5	**Miss Elise Tatman**	**HEA6 Breton House, Cross in Hand**	The site allocation is not suitable as it is unsustainable as directly contravenes the sustainability of the development plan. Firstly, the lack of services in the area - the village cannot support an influx of residents. The main street - the High Street is narrow, with small pavements and cars often parked along the kerb side and double yellows. Congestion is a common occurrence at the A267 junction along the High Street. A housing development here would only increase the amount of cars, air pollution, and danger to an already hazardous bottle neck. There are frequent accidents at this junction, some have been fatal, and so for this reason I rarely walk to services, I have to drive. I do not use the bus service as when I have looked into doing so they do not drop near to my place of work, and they are so infrequent in their times, it would not be suitable to use to get into a local town. The routes are inadequate and totally insufficient in what they provide.	Review site HEA6	**Review SA of Site**
6	**Mr James Young**	**Agricultural Land**	If WDC intends to minimise farmland loss then why propose development to be built on agricultural land. Does not believe any farmers have been consulted and the policy has been put together by individuals who do not know what they are doing. These plans are detrimental to the future of this county by further squeezing those who keep our agricultural economy working. The growth of these developments and settlements is alarming and now is the time to say enough and push back against the problem causing these unreasonable policies.	Noted. The best agricultural land (grade 3a) is protected from development in accordance with Government policy.	**None**
7	**Peter Roundell**	**General**	Not at this stage.	Noted	**None**

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LOCAL COMMUNITY					
ID	**Consultee**	**Issue**		**WDC Response**	**Proposed Changes**
8	**Mr Ian Gillespie**	**Site 123/3030 Land Adjoining Coxlow House, A267, Horam** **Site 875/3030 which incorporates site 123/3030.**	SHELAA site 875/3030 is similar to the area of proposed site allocation HOR6, but with the proposed allocation including some additional land within the northern part of the proposed allocation. The SA found that development of the site would conform with the overall strategy for development within the District, with no major negative effects of development identified. Agree with the headline reasons for allocation of site HOR6, which is in a sustainable location, and which would deliver significant benefits in terms of housing provision (including affordable housing provision), education provision and improvements to connectivity. Development of the site would also provide support for existing facilities within the village. There are of course constraints within the wider site area, and design considerations, including in relation to the interface between new development and the existing village, but these are matters that can be addressed at the detailed planning stage.	Noted and taken on board as the SA is progressed to support the emerging Local Plan	**None**
9	**Cllr. Mark Fairweather**	**General**	It is a thundering disgrace. It is absolutely littered with numerous errors.	Any errors identified will be corrected in the Regulation 19 version, which will be issued for further consultation.	**SA to be reviewed**

APPENDIX 4: LOCAL PLAN POLICIES

Policy	Title
SPATIAL STRATEGY	
SS1	Spatial Strategy for Wealden
SS2A	Provision of Homes
SS3	Gypsy, Traveller and Travelling Showpeople - Accommodation Needs
SS4	Retail Provision and Town Centres
SS5	Provision of Employment Floorspace
SS6	Strategic Employment Allocations
SS7	Ensuring Comprehensive Development and Housing Delivery
SS8	Responding to Climate Change
SS9	Health, well-being and quality of life
SS10	Green Infrastructure
CLIMATE CHANGE	
CC1	Net Zero Development Standards
CC2	Reducing Energy Consumption in Existing Buildings
CC3	Sustainable Design and Construction
CC4	Carbon sequestration
CC5	Renewable and Low Carbon Energy
CC6	Water Efficiency
CC7	Managing Flood Risk
CC8	Sustainable Drainage
NATURAL ENVIRONMENT	
NE1	Biodiversity, Geodiversity and Nature Recovery
NE2	Biodiversity Net Gain
NE3	Woodland, trees and hedgerows
NE4	Ancient Woodland and Veteran Trees
NE5	Ashdown Forest SPA
NE6	Landscape character
NE7	The High Weald National Landscape
NE8	Setting of the South Downs National Park
NE9	Agricultural Land
NE10	Light pollution and dark skies
NE11	Noise pollution
NE12	Air quality
NE13	Water Environment and Water Infrastructure
NE14	Contaminated Land and Land Stability

Policy	Title
HISTORIC ENVIRONMENT	
HE1	Conservation, Protection and Enhancement of the Historic Environment
HE2	Heritage Assets
HE3	Conservation Areas
HE4	Enabling Development
HE5	Historic Parks and Gardens
HE6	Archaeology
HOUSING	
HO1	Housing Type and Mix
HO2	Density
HO3	Brownfield Land
HO4	Small and Medium Sized Housing Sites
HO5	Self-Build and Custom Housebuilding
HO6	Houses in Multiple Occupancy (HMOs) and Subdivision of Existing Dwellings
HO7	Rural Exception Sites to meet Local Housing Need
HO8	Affordable Housing
HO9	Gypsy, Traveller and Travelling Showpeople – Site Criteria
HO10	Gypsy, Traveller and Travelling Showpeople – Safeguarding Sites
HO11	Specialist Housing for Older and Vulnerable People
HO12	Residential Accessibility Standards
HO13	Internal Residential Space Standards for New Dwellings
HO14	Rural Workers Accommodation
HO15	Conversion of Rural Buildings to a Residential Use
HO16	Park Homes and Residential Caravan Sites
HO17	Replacement Dwellings in the Countryside
HO18	Extensions and Alterations to Existing Dwellings, Outbuildings & Annexes
HO19	Extensions to Residential Gardens
INFRASTRUCTURE	
INF1	Infrastructure provision, delivery, and funding
INF2	Sustainable transport and active travel
INF3	Parking provision

Policy	Title
INF4	Utilities
INF5	Safeguarding of Infrastructure
INF6	Digital and Communication Infrastructure
INF7	Local services and Community Facilities
INF8	Open space, sports and recreation provision
DESIGN	
DE1	Achieving well-designed and high-quality places (Strategic Policy)
DE2	Masterplans and Design Codes
DE3	Spaces for people, nature and the public realm
DE4	Shop Fronts and Advertisements
ECONOMY & EMPLOYMENT	
EC1	Sustainable Economic Prosperity and Investment
EC2	Existing Strategic Employment Sites
EC3	Retention and / or Loss of Non-Strategic Employment Sites, Premises or Floorspace
EC4	Rural Economy
EC5	Equestrian Development
EC6	Tourism Facilities and Attractions
EC7	Visitor Accommodation
EC8	The Retention of Sites in Economic or Tourism Use and Community Facilities
Policy	Title
TOWN CENTRES	
TC1	District, Service and Local Centre Hierarchy and ‘Town Centre’ First Principles
TC2	Sequential and Local Impact Test
TC3	Primary Shopping Areas
TC4	Gardens Centres