



The countryside charity
Sussex

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Planning Policy
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17th January 2021

Dear Planning Policy Team

Wealden Local Plan Direction of Travel Consultation, November 2020

This is the formal response of CPRE Sussex – the Sussex Countryside Charity - to the Wealden Local Plan Direction of Travel Consultation, November 2020 (DOT.) CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We commend the aspirations of this document in terms of creating well designed, well located development that will mitigate and adapt to climate change and hope that this will translate into impactful policies which deliver against these aspirations. Our detailed comments are as follows:

Community Engagement

We welcome the Policy options throughout the DOT in relation to supporting Neighbourhood Plans. Wealden has a woefully low number of adopted Neighbourhood Plans. We would like a commitment from the council to supporting every Town and Parish to develop a Neighbourhood Plan, so that communities have a stronger role in Placemaking. We would like to see more proactive work by the council in relation to support for community-led housing and specifically the creation of Community Land Trusts.

Tackling climate change, achieving carbon zero outputs and improving air quality.

Question 1

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

With approximately half of the CO₂ emissions (47.2%) in the district from the transport sector, it is vital the new Local Plan does not lead to more car-dependant new development. It is not enough to rely on the switch to electric vehicles (although we do support this) as this alone will do nothing for congestion and active travel/health and wellbeing and still produce too many PM₁₀ and 2.5 emissions from brakes and tyres. New development must be carefully planned to reduce the need to travel by car, with good access to services, a mix of development and using the principles of 'walkability' (see for example [Walkability and Mixed Use - Making Valuable and Healthy Communities | Knight Frank Research](#) This links to chapter 13, and the recommendations of Transport for New Homes [Home - Transport for New Homes](#))

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

We strongly welcome the priority given to this issue but feel that the council must do more. A strong evidence base is essential.

We would like the council to gather robust data in relation to the current carbon sequestration capacity of the district and the impact of new development / land use change on this capacity. We believe that the plan should avoid car-dependant new development, however where this is unavoidable (for example a rural exception site) then the additional CO₂ emissions must be accounted for. This could be part of policy option 10.

The council could consider the potential for hydrogen.

The council considers that it is directly responsible for 0.2% of the district's carbon emissions but recognises that the emissions created/reduced as a result of its decision-making processes are substantial. It is vital that the council moves from a position of 'predict and provide' to a 'vision and validate' approach, so that the trajectory to net zero across the district is deliverable. With a large quantity of CO₂ emissions from building homes, in heating these new homes and the residents subsequently travelling, the council's actions in permitting development are significant. The amount of carbon emitted also depends on the type of construction and the location of these new homes. The council must show real leadership in this area if it is to fulfil the declaration of a climate emergency. We ask that you record all CO₂ emissions from your decision-making functions and frame the policies in the new Local Plan to deliver against the net zero trajectory.

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

Question 2

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

We welcome proactive work with Southern Water and other associated statutory bodies in relation to sewerage capacity and hope that realistic phasing and siting of development will be planned in line with any necessary upgrades to current facilities. We would be interested to

hear how Southern Water consider that a target of 1,225 homes per annum can be supported without detriment to the natural environment.

As well as the laudable policies set out, the council should also protect existing infrastructure, particularly rural pubs which are being closed simply because the sites are worth more as housing commercial use, although they are a valued community asset.

There seems to be an absence of understanding that rural roads across the district, many of which follow ancient drove lanes, are unsuitable for use by construction vehicles and a massive increase in domestic traffic caused by adjacent developments. Road infrastructure is not just about major A roads in the south of the district.

We would like to remind the council that support for a new offline bypass between Lewes and Polegate does not comfortably sit alongside plans to reduce reliance on private car use. Neither does it help to maintain the character the district that is within the setting of the South Downs National Park.

The 2013 Core Strategy confirmed that land would only be released for development once plans for the delivery of the necessary supporting infrastructure was in place. However, despite this commitment, very little new infrastructure has been provided for a plan that was based upon 450 homes/year. With a new plan potentially based upon 1,225+homes/year, the infrastructure deficit could rapidly further deteriorate. The new plan must include policies that do not simply pay lip service to the deficit by permitting new housing development to proceed without the infrastructure being delivered. Policies linking infrastructure delivery with housing growth must be deliverable and effective.

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

Question 3.

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

You have not asked for any comment about the number of new homes, which we consider to be an omission. Adopting the current 1,225 homes/year over a 20 year plan life will increase the housing stock in the district by 35%, which will dramatically change the character of the district. We urge you to adopt an agile approach to the housing target in the plan as the impact of Covid-19 and Brexit are better understood. See our further comments below.

12. Do you agree with the proposed policy options?

It is helpful that the policy option for 'The provision of a clear strategy to bring sufficient land forward at a sufficient rate to meet our housing target and delivering these in the most sustainable locations for growth, **taking into account land constraints and limitations**' includes reference to constraints and limitations.

In its recent response to the consultation on changes to the current planning system ([Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK \(www.gov.uk\)](#)) There was a clear statement that;

*“Many respondents to the consultation were concerned that the ‘targets’ provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, **alongside what constraints areas face**, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in [Paragraph 11b of the NPPF](#) or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints. In order to make this policy position as clear as possible, we will explore how we can make changes through future revisions to the National Planning Policy Framework, including whether a renaming of the policy could provide additional clarity.”*

Para 6.25 of the DOT recognises, quite rightly, that the delivery of new homes within the Area of Outstanding Natural Beauty (AONB) is restricted by national planning policy and that planning permissions should be refused for major development other than in exceptional circumstances. We do not therefore think that it is appropriate to set a high housing target and expect major development within the AONB to enable that target to be met, we believe that a target should be set which does not require major development within the AONB. This is in line with government advice that ‘constraints’ like protected landscapes should be a factor in determining the overall level of growth which is planned for. Thus, we would not like to see an allocation for any major development within the AONB similar to that attempted at Ghyll Road in the withdrawn 2019 plan.

With a large proportion of the district within in the AONB, we would not expect the council to plan to accommodate the housing number derived from the standard method in the Low Weald; but robustly argue that the housing target should be reduced to reflect the proportion of protected land in the district, as successfully argued by Lewes District Council in the formation of their adopted local plan.

We support policy options for maximising opportunities to deliver on brownfield sites, particularly within existing towns and villages that benefit from existing infrastructure provision and encouraging the right types, sizes and tenures of housing within the district to meet the community’s changing needs.

13 Do you disagree with any of the options?

We disagree with the statement in 6.3 that **‘we must also be clear from the outset that our housing requirement is one that is set for us...’**

The Government has stated that ‘within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area...’: [Government response to the local housing need proposals in “Changes to the current planning system”](https://www.gov.uk/government/consultations/changes-to-the-current-planning-system) - GOV.UK (www.gov.uk)

The standard method is the starting point and it is for Wealden to decide on the appropriate level of growth, taking into account constraints and available land.

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

There is no reference to the number of empty homes and potential measures to bring these properties back into use.

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

Recognising the fact that Wealden’s existing housing stock contains a high proportion of larger dwelling stock, with far less 1 bedroom homes than the national, regional and sub-regional average, as well as more 4 bed and 5 bed (plus) homes, and that there is a substantial level of under-occupancy in Wealden (higher than the other wider Housing Market Area (HMA) local authorities and regional and national levels) it would make sense for the plan to focus on the delivery of the types of homes needed (1 and 2 bedroom and retirement properties.)

The National Planning Policy Framework (NPPF), re-emphasised by the recent White Paper, is explicit that housing delivery must match housing need: NOT JUST IN THE NUMBERS, but also in the types of housing provided. The new Wealden Local Plan must include this (as the South Downs National Park Local Plan does, **SDNP SD27/SD28.**). The council will NEVER meet the need for accommodation for an increasing number of older people OR meet the needs of young households priced out of the housing market OR meet the needs of low income households who will require subsidised, probably rented, housing, if it allows a laissez-faire system that leaves it to the market to decide what types of housing to build. The failure of market housing to co-deliver acceptable levels of affordable housing is evident to all.

We would like the plan to include a separate target for affordable homes, recognising that this won’t be achieved just as a by-product of market homes. The plan must consider other ways of reaching this target (such as via Sussex Weald houses.) Having said this, we also consider that the council should seek at least 40% affordable homes from every major development and be more rigorous in terms of assessing viability when developers seek to reduce this proportion.

If a Community Infrastructure Levy (CIL) or anything like it still exists as the plan is developed, the council should consider setting much higher rates for rural greenfield development (which creates high infrastructure needs) and very low rates for urban brownfield. At present the financial incentives are to build on greenfield wherever a developer can. CIL should be to change this around. Retirement villages can afford CIL.

A significant issue in Wealden is the transfer of unmet Eastbourne housing need to Wealden. If Wealden's declaration of a Climate Emergency has any meaning, then this should mean that:

(a) Eastbourne must meet its own housing needs by planning for urban redevelopment and the reuse of redundant urban property assets at urban locations where sustainable living is an option, and must NOT seek to transfer that need to car-dependent countryside sites in Wealden where public transport use is not a practical option; and

(b) new housing must be matched by, and conditional on, new employment provision to reduce the need to commute.

Question 4

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

The council should consider policies which will prevent developers splitting sites into discrete sections to avoid building affordable homes.

20. Do you have any other comments in relation to how we can plan to deliver affordable housing, including the range, type and tenure?

The low proportion of affordable homes provided in Wealden (26%) arises because of the large number of windfall sites permitted by the council. We need a significant step change in the volume of affordable houses delivered by the council (Sussex Weald Houses) and more support for Community Land Trusts (CLTs)/Community-led Housing.

Instead of allocating major development within the AONB and expecting a small percentage of the affordable housing needed to be built, the council could do more to support local communities to set up CLTs to bring forward small scale development that meets local needs.

Support local businesses, increase jobs and ensure a thriving, diverse and a locally sustainable economy

Question 5

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

We welcome an update to the economic evidence base. It would be helpful for the council to understand the impact of Covid-19 and increased home working on commuter levels and how the new plan can further support reducing the need to travel for work, the provision of transport hubs or community hubs and broadband to allow flexible working for small businesses or individuals. Poorly connected out of town industrial zones/business estates are less desirable we would like the council to resist converting industrial zones into out-of-town retail parks. We welcome support for small businesses looking to have smaller/flexible office

space, particularly in a post Covid-19 landscape. It is unclear what the impact of Covid-19 will be on overall employment in the District with the closure of many shops and hospitality venues.

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

Question 6

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

Whilst there is local support for free car parks, these are very busy. Improvements to rural bus services to and from our towns would support the council's climate commitments and provide more travel choice for local residents.

Improve our existing tourism offer and increase visitor spend

Question 7

35. Do you have any other comments in relation to how we can plan for tourism and culture within the district?

We agree that 'Our core appeal to both residents and visitors is our beautiful, varied and unspoilt landscapes and views, with undeveloped coastal cliffs, beaches and countryside that varies from ancient woodland, forests and heathland to a patchwork of medieval fields, parklands and open rolling downs.'

There must be joined-up thinking across council services to support tourism. For example, protecting environmental assets enhances the tourism offering. The impact of building 1,225 homes/year must also be understood in terms of the urbanisation of rural areas which may make them less attractive for tourism

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

Question 8

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

Section 1.19 of the DOT acknowledges that relevant and **up-to-date evidence** is needed. We believe that a strong evidence base is essential for the smooth progression of any local plan. The council must ensure that this evidence informs the plan and is not retrofitted once site allocations have been determined. The evidence base must include the Green Infrastructure Strategy, Nature Capital and Ecosystem Services Assessment, Ecological Appraisal of potential strategic sites and an assessment of the district's Nature Recovery Network.

There must be greater protection for our small ancient woods, the 15m buffer zone does not adequately protect ancient woodland when a large housing development is built alongside. To protect ancient woodland, which Wealden is justly proud of, a more sympathetic approach is needed, in line with recommendations from the Woodland Trust [planners-manual-for-ancient-woodland.pdf \(woodlandtrust.org.uk\)](https://www.woodlandtrust.org.uk/planners-manual-for-ancient-woodland.pdf). These recommendations should form the basis of council policy.

There is no mention specifically of Ashdown Forest and nitrogen deposition. We know this damages the fragile ecosystem that supports internationally important species. We are disappointed by the council's current complete rejection of its own evidence in relation to the impact of development on the Forest.

Question 9

41. Are there any issues or challenges that we have missed?

The Pevensey Levels SAC is threatened by a lack of knowledge of how the huge number of new SUDs from developments around Hailsham and Stone Cross will interact.

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

We welcome the option relating to resisting the inappropriate loss of green infrastructure, green infrastructure assets (trees, hedgerows, open spaces etc) and green/blue spaces. These assets should be mapped. We would like to see the timetable for the creation of the Green Infrastructure (GI) strategy. It is essential that it informs the plan, not the other way around.

Protecting our high quality landscapes, our heritage and cultural assets

Question 10

47. Do you agree with the proposed policy options?

We welcome the proposed policy options, particularly in relation to resisting inappropriate loss of valued landscapes, promoting dark night skies and the protection of green and blue corridors, protection and enhancement of rural landscape features in their own right i.e. hedgerows, field patterns, settlement patterns, trees, water features and design within the landscape. We would be happy to work with the council to develop these options.

48 Do you disagree with any of the options?

In terms of a 'criteria-based policy for allowing development in the countryside' - the NPPF is not supportive of isolated homes in the countryside and this could severely compromise the commitment to carbon reduction by creating car dependant new development. We believe that new development should be well located in terms of access to services.

The DOT states that ‘The Council has a legal duty to ‘enhance and conserve’ the AONB landscape and its features. However, we are also under pressure to meet the demand for housing and employment growth. For example, where we are unable to meet our housing growth targets outside the AONB, we may need to consider meeting our growth requirements within the AONB.’

We would like to remind the council that major development in the AONB is not supported by National Policy, except in ‘exceptional circumstances.’ Meeting a housing target is **not** an exceptional circumstance. We would support small scale affordable housing within the AONB, particularly if it is community-led housing that does not harm the landscape and conforms with the High Weald Design guide.

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

It is essential that the policy includes protection for setting of protected landscapes.

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

With the great pressure to expand the built area into the Low Weald, the council must ensure that there is a solid evidence base in terms of where development would and would not be acceptable in landscape terms.

Creating high quality places through good design

Question 12

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

We would like the council to consider adopting the High Weald Design guide as a SPD, so it has more weight. The council must ensure that proposals do comply with this guide or the Wealden Design Guide as appropriate.

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

Plan policies must be clear that proposals that do not comply with either of the relevant design guides will be refused.

Help our communities to thrive, living safe, inclusive and healthy lives

Question 13

65. Do you have any other comments in relation to how we can plan for health and wellbeing within the district?

The council must work with East Sussex CC to make rural cycling and walking safer, further study is needed. Also, see our response to chapter 1.

Our Growth Options

Question 14

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

The council has listed four spatial options but unfortunately has not provided any examples of the possible numbers of additional homes that would be needed for each option. This lack of numerical examples is not helpful for the public to understand the implications. In addition, whilst asking these questions, it would also have been helpful to detail the constraints afforded by the AONB. For example, for Option 1, it is highly unlikely that Crowborough or Heathfield could accommodate a proportionate share of the development due to their location. This means that the other three main urban areas would have to accommodate a disproportionate share of the development. Similarly, for Option 3, a table could have been included listing each settlement size and indicating the approximate number of new homes that settlement would be anticipated to accommodate.

We suggest that the complete lack of numerical data to support any of these options reduces the usefulness of responses to this section.

A further option which sets an appropriate target for housing, balanced with the need to protect the unique and vitally important character of Wealden should be developed, in line with a realistic housing trajectory.

68 Do you disagree with any of the options presented?

It is very disappointing that most of the options include the phrase 'Accepting further development in some locations would involve substantial development in the High Weald AONB that would need to be justified through national planning policy.' We do not believe major development is justified in the NPPF if para 172 is correctly applied and the council will be aware that the NPPF affords the AONB the highest protection.

It is also very disappointing that in this section addressing growth options, that there is an almost complete lack of figures which would enable the public to fully understand the scale and impact of trying to find sites for around 25,000 homes.

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

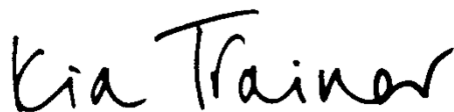
We are concerned with the wording of this question. 1,225+ homes/year over a 20-year plan period equates to almost 25,000 homes. Thus, a new settlement of 2,000 – 5,000 homes will not provide a large proportion of development needs. Indeed, if a large proportion was to be provided by new settlements, this would require several settlements of this size.

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

We would not support a new settlement unless it is sustainably located (reducing dependence on car use) and has the full support of the local community.

A 2,000 – 5,000 home settlement should not be located in the AONB. Therefore, it will have to be in the Low Weald. But in reality, the question should be asking about settlements in the plural. If four new settlements would be needed to provide a large proportion of the development need and these would all need to be located in the Low Weald, then we anticipate that any support for this new settlement option would be much reduced.

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The script is fluid and cursive, with the first letters of "Kia" and "Trainor" being capitalized and prominent.

Kia Trainor
Director, CPRE Sussex