

[planningpolicy@wealden.gov.uk](mailto:planningpolicy@wealden.gov.uk)

27 March 2026

Dear Sir/Madam

**Re: Response from CPRE Sussex to the Reg 18 Consultation on the Wealden Local Plan**

I am writing on behalf of the CPRE Sussex, the Sussex branch of the Campaign to Protect Rural England, registered charity 1156568. We set out below our reactions to the current Regulation 18 consultation on the Wealden Local Plan.

**Housing targets**

First and foremost, we recognise the unacceptable and practically impossible position that Wealden as a Local Planning Authority, has been placed in by the Government's approach to housing targets.

In March 2024, Wealden District Council published a draft local plan (known as Regulation 18) that set out the Council's draft policies and growth strategy for the plan period. However, in December 2024, the National Planning Policy Framework (NPPF) was updated as well as the calculation on housing need, known as the 'standard method' which results in substantial increased housing need within Wealden District compared to that in our March 2024 draft local plan.

The 'Standard Method' produces an entirely unrealistic housing requirement for Wealden of a total of 24769 new dwellings to be delivered at the rate of 1457 dpa. The formula that produces this total is largely disconnected from real local need.

Given the many constraints faced by the district, it is entirely appropriate therefore that the LPA is proposing a lower housing target than that suggested by the Standard Method, with the new draft making provision for a further 16609 new dwellings to be delivered at the rate of 977dpa (policy SS2), a shortfall of 8160 new dwellings against the 'Standard Method' target.

Sadly, we are sceptical that the Plan, with such a target, will either be allowed to proceed to examination by government ministers, or deemed sound by an Inspector at examination, though the LPA should seek to robustly defend its logic.

Indeed, we do not believe that even this proposed lower target is acceptable or deliverable, given the other stated constraints - and worthy strategic aspirations of the plan (around landscape, nature, climate, water, community infrastructure).

As such, we are deeply concerned by the approach set out in the Draft Plan, of proposing a number of 'Options', over and above the proposed site allocations, for *further* sites, most of which are clearly unsustainable and in contradiction to the Plan's own policies. It seems to us that this approach – with many more sites to be potentially included in the Regulation 19 submission draft at the eleventh hour - fundamentally undermines the democratic process, and would see the authority collaborating by stealth in destroying the landscapes, communities and environment, it acknowledges are so precious.

### **Pre-existing challenges that make even the level of growth proposed unacceptable**

As stated in the Draft Local Plan:

- The majority of Wealden is located within the High Weald National Landscape (53%), and the council have a duty to actively seek to further the conservation and natural beauty of this nationally important historic landscape.
- There are two European habitats sites within the administrative boundaries of Wealden District Council that includes the Pevensey Levels Special Area of Conservation (SAC) and Ramsar Site, and the Ashdown Forest SAC and Special Protection Area (SPA) and Wealden District Council as the 'competent authority', must carry out an assessment under the HRA regulations, to test if a project proposal or plan (in this case) could significantly harm the designated features of a European site.
- Wealden District Council also declared a biodiversity crisis in 2025 and is covered by the Local Nature Recovery Strategy (LNRS). Paragraph 2.41 confirms "that the Council will aim to support nature-first policies and to ensure that policies of the local plan are aligned with the goal of restoring biodiversity, functional connectivity, and ecosystem resilience, so far as achievable within the planning system".
- Wealden District is situated within a diverse and distinctive landscape, including some of the most attractive countryside in the country. Paragraph 2.36 points out the quality of the landscape as a valuable resource and asset contributing to the district's rural economy, and the provision of ecosystem services, as well as providing opportunities for recreation. Paragraph 2.37 highlights a significant biodiversity resource, with many European, national and local designated sites. With around 3% of England's entire designated ancient woodlands located in the district. Ancient woodlands are home to many rare and threatened species, and

they are often described as an irreplaceable resource or considered as 'critical natural capital'.

- There are numerous Biodiversity Action Plan (BAP) habitats present within Wealden (Paragraph 2.39) and many of these areas are identified as Biodiversity Opportunity Areas (BOAs). Sadly, many of site allocations are situated within such areas.

(In addition, the government's just-published Land Use Framework, indicates that the Low Weald has a high potential for nature restoration as shown in the following map.)

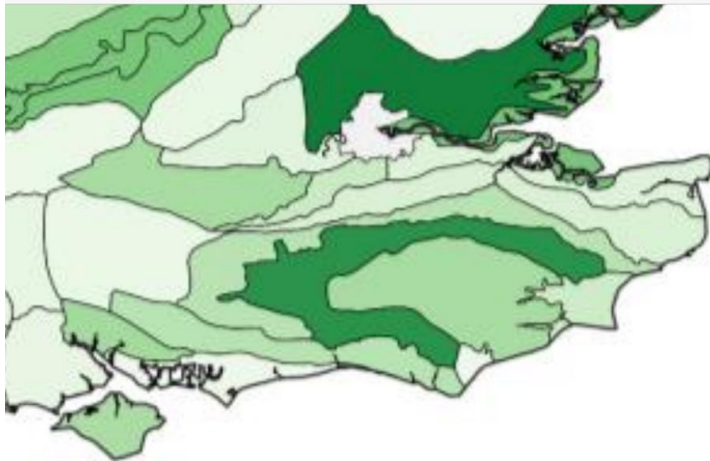


Fig. 6 Areas in England coloured by their potential for nature restoration, from low potential (white) to high potential (dark green). HM Government (2026) *The Land Use Framework for England*

- Availability of water: Wealden District is an area of a serious water stress.
- The public transport network within the district is currently considered poor. The rail stations in the north of the district do not directly connect with the rail stations in the south of the district, so there is limited rail connectivity between settlements in the district. There are also many urban areas, such as Hailsham and Heathfield, as well as many of the district's other settlements, which do not have direct access to rail services. As a consequence, there is a heavy reliance within the district on the use of private vehicles for journeys, with Wealden having the highest rate of car ownership in East Sussex (89.6% whilst national average is 76.5% and East Sussex average of 80.5%)
- According to the 2021 Census under 3% of travel journeys to work were made by rail or bus and less than 1% of commuting trips are made by bicycle.
- The district is connected to the Major Road Network (MRN) largely via the A22 and A26, which run through the district north-south. Several key junctions and roads on these corridors are currently at, or reaching capacity, and experience congestion and delay during peak hours.
- Although there is variability for different settlements, only 54.6% of households overall have access to a GP practice within 15 mins by public transport or walking. This is below the average of East Sussex, which is 63.5%.

- Across the whole district, there is a significant mismatch between household incomes and the cost of market housing. This leads to significant shortages of market housing that is affordable and results in difficulties for people to get onto the housing ladder, particularly younger people. In addition to high house prices, it is also expensive to rent a property within Wealden, which again goes to affordability, especially for those on lower incomes who are also unable to access market housing.
- According to the Draft Local Plan, affordability has significantly deteriorated in Wealden since 1998 and in 2024; the median house price in Wealden was 11.62 times median annual workplace-based earnings (higher than across the Southeast region (9.610 and across England and Wales 97.54)
- Paragraph 5.9 of the Spatial Strategy states that in line with the statistics, the Council's Local Housing Needs Assessment (LHNA) identified that the district has a significant affordable housing need of 754 dwellings per annum (dpa). The requirements of policy HO8 (Affordable Housing) will clearly fail to meet this need, if affordable housing is only to be provided at a level of 35% of the total number of dwellings.

There is a welcome recognition in the Draft plan of many of these challenges, and we are heartened by paragraphs that, for example, state:

*3.7 Meeting the development needs of the area is a key focus of this plan. However, we are also required to consider whether we can meet development needs without adversely impacting areas or assets of importance, such as our designated biodiversity sites and irreplaceable habitats, protected landscape designations such as the South Downs National Park and High Weald National Landscape, designated heritage assets or areas at risk from flooding. We must consider whether these factors are reasons to restrict growth in our area, or whether it can be demonstrated that adverse impacts would significantly outweigh the benefits when assessed against the NPPF as a whole.*

*3.13 Outside of the protected High Weald National Landscape, the draft spatial strategy seeks to restrict development in the open countryside to ensure that the character and identity of our settlements are maintained and that our valued landscapes, countryside and open spaces can continue to provide essential ecosystem and agricultural services. This also reduces the carbon footprint of new development in relation to introducing any associated infrastructure and services that would be required in isolated locations, as well as ensuring that new development is located sustainably to reduce the reliance on the private motor vehicle.*

*Policy SS1: Land outside development boundaries will be considered as the countryside. The countryside will be protected unless development is supported by a specific policy referenced elsewhere in this plan.*

However, many of the proposed site allocations *do not* meet the requirements recognised elsewhere in the plan, and stand in contradiction to the plan's own policies. As such, the level of housing growth as proposed in this draft is likely to make many of these challenges even worse – while failing to address the housing affordability crisis.

Of very significant concern are the series of 'optional' sites, clearly assessed as being unsustainable, which look suspiciously like they are designed to be brought into play to 'make up the numbers' and satisfy an examining Planning Inspector at a late stage in the process, even though they would undermine the strategic intent of the Plan's own policies.

There is a significant risk that the Plan will end up consisting of aspirational and ambitious policies that are not worth the paper they are written on, undermined as they are by poor site allocations.

### **Site allocations that we cannot support**

Given the Plan's welcome stated strategic priorities, there are a number of proposed site allocations that we cannot support, and which we believe must be withdrawn. We recognise that this may make the position even more challenging in relation to the government's requirements and a potential plan examination, but we do not believe that these sites meet the requirements for genuinely sustainable development, as required both by the National Planning Policy Framework, or by the Plan's own policies.

### **POLICY CR3 - Land at Steel Cross Farm, Green Lane, Crowborough**

*Reason for our objection:* Overdevelopment of this site, failing to respect the pattern of development in the area within the National Landscape. A further encroachment to the open countryside, harmful to this designated landscape. Cumulative impact of development should be considered. The NPPF requires that development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities.

### **POLICY EH2 - Land at Hesmonds Stud, East Hoathly, 170 dwellings**

*Reason for our objection:* Development not suitable for this size of village which is already extensively extended. This development would lead to the increase of traffic in the area and would affect the integrity of the local community.

**POLICY EH5 - Harrison's, South of London Road, East Hoathly, 150 dwellings**

*Reason for our objection:* Countryside location (even though, outside of the protected High Weald National Landscape, the draft spatial strategy seeks to restrict development in the open countryside). There is not attachment to the existing settlement, and future occupiers would entirely rely on cars. The field is in the middle of countryside surrounded by Ancient Woodland.

**POLICY FF5 - Land at Bird in Eye (North), Bird In Eye, 215 dwellings**

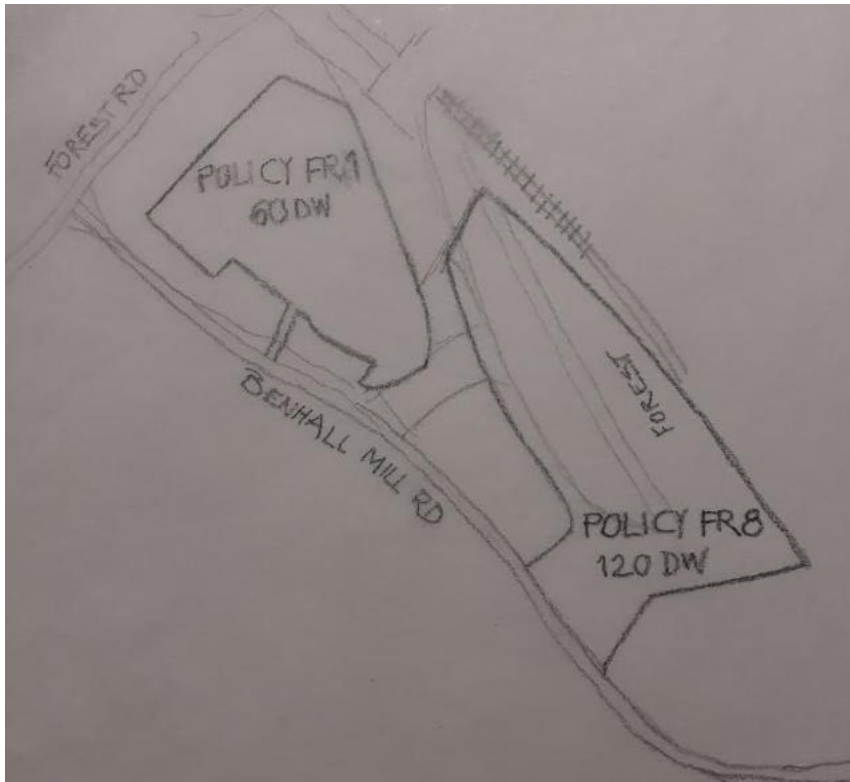
*Reason for our objection:* Countryside location, land not adjacent to the settlement (except for the small 'appendix' on the northern side of rail track). Threat of damage and deterioration to the Ancient Woodland adjacent to this site. This encroachment would erode the integrity of the surrounding of this irreplaceable habitat, in what is noted as a Biodiversity Opportunity Area.

**POLICY FR1 - Land at Benhall Mill Road, Tunbridge Wells, Indicative Capacity: 60 dwellings**

*Reason for our objection:* Local Wildlife Site

**POLICY FR8 - Land to the east of Benhall Mill Road, Tunbridge Wells, Indicative Capacity: 120 dwellings**

*Reason for our objection:* High Weald National Landscape, Priority Habitat Deciduous Woodland. Cumulative impact, taken with FR1: 120 dwellings +60= 180 dwellings



**POLICY FR2 - Land off Bayham Road, Tunbridge Wells, Indicative Capacity: 100 dwellings** Impact on the High Weald National Landscape

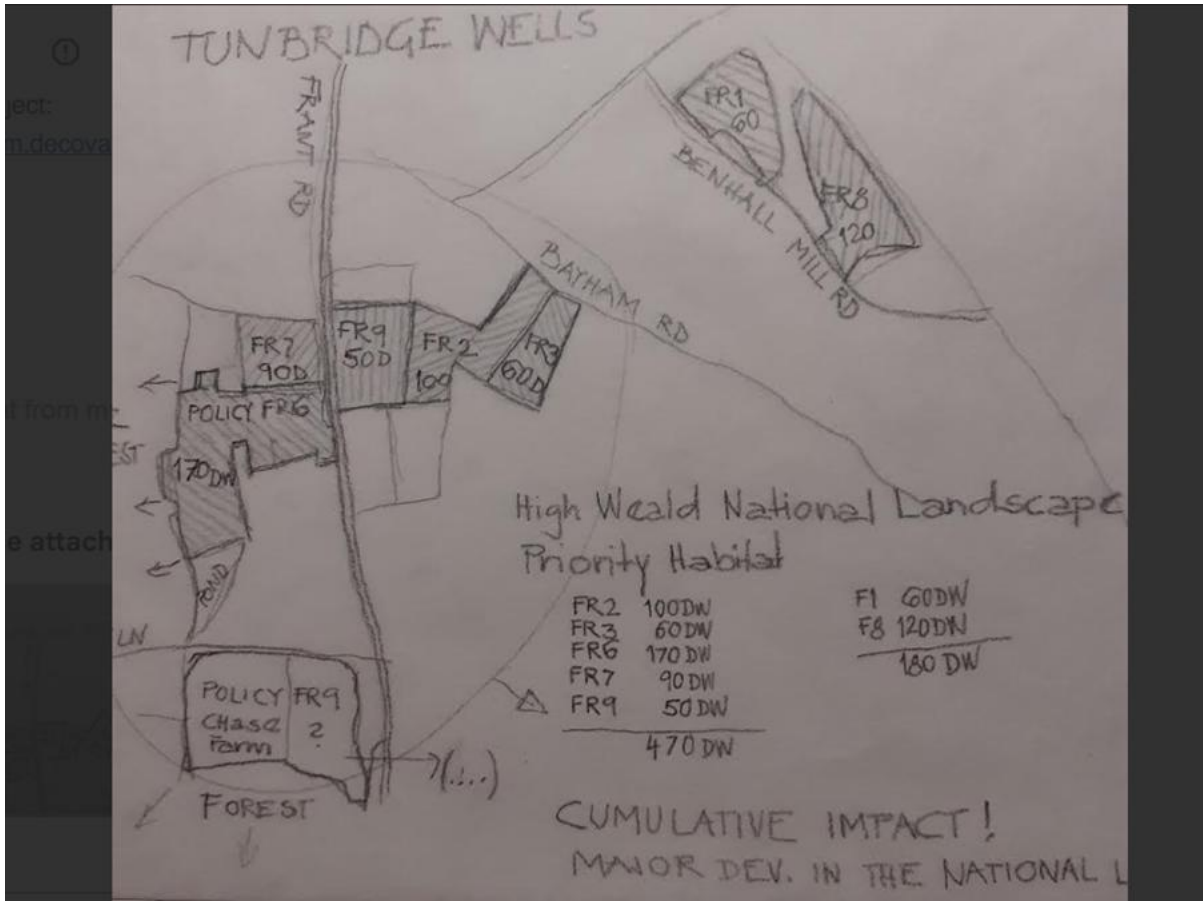
**POLICY FR3 - Land at Bayham Road, Tunbridge Wells, Indicative Capacity: 60 dwellings** Impact on the High Weald National Landscape

**POLICY FR6 - Pinewood Farm, Frant Road, Tunbridge Wells, Indicative Capacity: 170 dwellings, High Weald National Landscape, Biodiversity Opportunity Area, Priority Habitat**

**POLICY FR7 - Land lying to the west side of Frant Road, Tunbridge Wells: Indicative Capacity: 90 dwellings, High Weald National Landscape**

**POLICY FR9 - Land at Tunbridge Wells Rugby Club and Chase Farm, Frant Road, Tunbridge Wells, Indicative Capacity: 50 dwellings, High Weald National Landscape, Ancient Woodland, Priority Habitat Deciduous Woodland**

All these sites (**POLICY FR2, FR3, FR6 FR7 and POLICY FR9**) are in a close vicinity **with a cumulative indicative capacity of 470 dwellings within the National Landscape.** This represents a major development on the very edge of the settlement and is not appropriate for the site within National Landscape.



**POLICY HA1 - Land east of Battle Road, Harebeating Lane, Hailsham,** Indicative Capacity: 300 dwellings, major development within countryside.

**POLICY HA4 - Land at Harebeating Nursery, Harebeating Lane, Hailsham,** Indicative Capacity: 10 dwellings+400=410 dwellings

**POLICY HA3 - Land adjacent Pattenden Farm, Battle Road, Hailsham,** Indicative Capacity: 100 dwellings: 100+300=400 dwellings, .... the historic setting of Yew Tree Cottage (to the west) and Harebeating Windmill (to the north), both Grade II Listed;

All these 3 sites are situated in a juxtaposition – cumulative impact of 410 dwellings in countryside location.

**POLICY HA6 - Bolneys Farm, South Road, Hailsham,** Indicative Capacity: 60 dwellings, : Ancient Woodland, **Biodiversity Opportunity Area,** Priority Habitat Countryside location on the edge of settlement, adjacent to the woodland.

**POLICY HEL5 - Field at North Street, Lower Horsebridge**, Indicative Capacity: 14 dwellings. Hellingly Conservation Area, Site to the rear of gardens, situated in the between cemetery and Primary School; rather challenging location, the access would require loss of mature trees.

**POLICY HEL6 - Land at Horselunges Manor, Hellingly**, Indicative Capacity: 60 dwellings, Hellingly Conservation Area. HEL 5 and HEL6- wrapping around the Cemetery. 60+14=74 in unsustainable countryside location. 'Take measures to maintain the tranquillity of the Hellingly Cemetery'.

**POLICY HEL7 - Land at Park Farm, New Road, Hellingly**, Indicative Capacity: 100 dwellings, Local Wildlife Site, Ancient Woodland

Countryside location, the Ancient Woodland within the northeast and southeast of the site and along the eastern boundary (Park Wood), the Local Wildlife Site (Jarvis's Wood, Nobody's Wood Park Wood Complex) in the south of the site, 'appropriate financial contributions or on-site measures' to offset any potential biodiversity loss arising from development. Entirely unsustainable location, this development would be harmful to integrity of Ancient Woodland, contradicting the majority of the Draft Local Plan policies.

**POLICY HOR6 - Coxlow Farm, Horam Road, Horam**, Indicative Capacity: **750 dwellings**, 4,000sqm Employment (E(g), B2 and B8), 1,500sqm community floorspace, 2.4ha Two-Form Entry Primary School

Ancient Woodland, Priority Habitats, Flood Risk... A massive encroachment to the countryside! Village situated at the very edge of the National Landscape open towards the South Downs NP.. Village with up to 1200 dwellings; 750 dwellings (almost 2/3 of exiting). Located in Low Weald with a high potential for nature restoration.

**POLICY LH1 - Land at Owlsbury Farm, Lewes Road, Uckfield**, Indicative Capacity: 1,500 dwellings, Biodiversity Opportunity Area (River Uck and its headwaters), Ancient Woodland

Our objections to the development on this site, made in response to the current planning application, remain. The proposed development due to its location is entirely against the Draft Local Plan as a whole, and relevant paragraphs of the NPPF. This development would sprawl beyond the Uckfield Bypass like an 'appendix' of settlement' whilst a bypass is a road that avoids or "bypasses" a built-up area to let through traffic flow without interference from local traffic. The proposed development would convert the bypass into an ordinary town road, and the bypass may eventually become as congested as the local streets it was intended to avoid. Entirely unsustainable location.

**POLICY MA1 - Land south of Maresfield, A22, Maresfield**, Indicative Capacity: 210 dwellings, Biodiversity Opportunity Area, Priority Habitat, Flood Zones 2 and 3

Countryside location in 'the lap' of two bypasses-Maresfield Bypass and Uckfield Bypass. Out of Maresfield, approaching towards Uckfield... Walkable services: McDonalds and Shell fuel station! Does it mean to be an extension of Maresfield? Unattractive location enveloped by noise from traffic.

**South of Victoria Park, Ridgewood, Uckfield**, Indicative Capacity: 100. Ancient woodland, Priority Habitat Woodland, Within the 7km Ashdown

Site in the middle of the countryside, surrounded by fields and park.... 100 dwellings in the fields adjacent to the adjacent Ancient Woodland with Priority Habitat. Contrary to all policies within the Draft Local Plan. Biodiversity Opportunity...

**POLICY UCK11 - Land at White House Farm, London Road, Uckfield**, Indicative Capacity: 240 dwellings. Ancient Woodland, Biodiversity Opportunity Area, Priority Habitat. One can't be sure which settlement is this site related to. Field on the edge of Ancient Woodland. Disrespectful to the prevailing pattern of the area and natural environment. Entirely unacceptable location against all principles of urban development.

**POLICY WES5 - Sharnfold Farm, Hailsham Road, Stone Cross**, Indicative Capacity: 350 dwellings, Priority Habitat, Biodiversity Opportunity Area. Approved for 31 dwellings.

Countryside location, site adjacent not to settlement but A27 Bypass. The site lies within the Pevensey Levels catchment, biodiversity, and amenity; the historic character and rural setting of the heritage assets comprising of two listed buildings on the main farm complex towards the centre of site, Sharnfold Farm Barn and Sharnfold Farm Cartshed (Grade II Listed);

**POLICY WES6 - Land at and Adjacent to The Downs View and Emberson, Hailsham Road, Stone Cross**, Indicative Capacity: 60 dwellings

Countryside location, with an extension of settlement beyond the obvious boundary created by the bypass to the open countryside with all the consequences for landscape, etc. 350+60=410 dwellings in countryside. The open countryside and open character of the Pevensey Levels, with views to the South Downs National Park, should prevail.

**POLICY WES7 - Land at Peelings Lane, Westham**, Indicative Capacity: 150 dwellings. close proximity to Pevensey Levels Special Area of Conservation (SAC) to the north and east of the site.

This development on the other side of the Lane is not genuinely adjacent to the settlement. It represents major development in the open countryside with

unacceptable impact on integrity of Pevensey Levels Special Area of Conservation (SAC), connected to the proposal site via Martin's Ditch. The Pevensey Levels (adjacent to the site), forms a significant part of the surrounding landscape, covered by various statutory designations, including Sites of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), and Ramsar site. The majority of the site (western half) is within an area classified as being 'darker' in the light pollution mapping, and significant light pollution would be introduced.

The 2023 Landscape Sensitivity Assessment states that the site landscape is moderately to highly sensitive, because of its prominent location and topography, the site provides far reaching views northwards towards the Pevensey Levels SSSI, SAC and Ramsar site and other rural locations north of the site. A vehicular access at the south-western corner of the site would require the widening of Peelings Lane to allow for two lane traffic and pedestrian footpaths.

#### **'Table 6' 'Optional sites'**

While we sympathise greatly with the position that the government's Standard Method targets have placed the LPA in, and the need to demonstrate that all possibilities have been thoroughly explored, we simply cannot support the inclusion of the 'optional' sites listed in the Draft Plan's Table 6. As noted in para 3.64, "these sites are not suitable for allocation at present" - and for very good reasons relating to their unsustainability and policy non-compliance.

As the Sustainability Appraisal makes abundantly clear, the 'preferred' Options 3 and 4 will "have a significant impact on the open countryside and rural character of the area, including the setting of the South Downs National Park and High Weald National Landscape", as well as negative impacts on transport, pollution and climate change.

Pursuing these Options would make an absolute mockery of the strategic aims of the Plan, set out in policy, destroying many of the special qualities of the district.

We trust that the Plan will be duly amended before the Reg 19 submission draft.

Yours faithfully

Maria Tomalova

Planning Campaigner, CPRE Sussex