

CPRE Sussex & WGOD

Guidance Note for commenting on a site allocation for the Wealden Reg.18(2) Local Plan Consultation

Contents

	Page
Summary	2
The Consultation	4
Housing in the Reg.18(2) Local Plan - Spatial Strategy	6
- Allocations by Parish	8
- Allocations by site	10
- The four Spatial Options	10
Sustainability requirements for the local plan – NPPF requirements	18
- WDC Sustainability objectives	19
Site selection process	- SHELAA 23
	- Sustainability Appraisal 23
Inaccurate sustainability appraisal scoring	24
Demonstrating an allocated site is unsustainable	29
Appendix A – consultation questions	31
Appendix B – proposed housing by Parish	54
Appendix C – proposed housing by site	58
Appendix D – proposed option sites	66
Appendix E – sustainability objectives	78
Appendix F – example of a sustainability critique for site WES 7	90
Appendix G – sustainability document links	152

Summary

Wealden released its Reg.18(2) Local Plan¹ for a consultation on 6 February running through to 20 March. The new plan is to run for 17 years from 2025 – 2042 and it sets out the development proposed for the district.

This Reg.18(2) plan is not a complete update on the Reg.18(1) plan consulted upon in the spring of 2024, but a “focussed” update concentrating primarily on changes to the Spatial Strategy and the sites allocated for housing and employment.

Policy SS2 in the Reg.18(2) plan calls for 16,609 houses to be provided by 2042, compared to the 15,729 houses in the Reg.18(1) March 2024 plan.

However, the government imposed standard method formula, which has to be used to determine Wealden’s so-called minimum housing “need”, produces a figure of 24,769 houses for the plan period.

With planning authorities required to plan to meet their “need”, which Wealden was unable to do in its Reg.18(1) plan, they have now included four spatial options in the Reg.18(2) plan containing additional sites which could increase the housing number from the current 16,609 houses to 24,911 houses, this being just over the 24,769 house “need” figure. On an annual basis, the “need” figure comprises 1,457 houses/year, whereas the 16,609 houses is 977 houses/year.

In comparison, Wealden’s current local plan, the 2013 Core Strategy, which planned for the period 2006 – 2027 was for 450 houses/year.

The local plan is also required to plan for the employment need, which has been assessed as a total floorspace of 194,400m² for the plan period. The Reg.18(2) plan allocates four new sites totalling 132,420m², which when added to the three existing permitted sites totalling 27,110m², gives a planned total of 159,530m². The four spatial options considered also look at employment space and option 4 includes for 325,921m², which represents 163% of the employment need.

It is considered that 16,609 houses is far too many for our largely rural district and will cause immeasurable harm to our countryside and quality

¹ [New Local Plan - Wealden District Council](#)

of life, but if the plan includes for 25,000 houses (Wealden currently contains 75,000 houses), the consequences will be catastrophic.

This note is designed to assist residents, Town/Parish Councils and action groups opposed to unsuitable development in Wealden to frame and submit objections to the Spatial Strategy and site allocations part of the ongoing consultation. The National Planning Policy Framework (NPPF – the planning “rules”) is based upon and requires development to be sustainable. In this note, readers will be steered towards identifying issues and parameters that demonstrate that the allocated sites may not be as sustainable as set out in the plan and therefore are less suitable to be included as an allocated site.

Therefore, the soundness, accuracy and sustainability scoring of proposed allocations and option sites should be challenged. The documents used to confirm a site is suitable to become an allocated site for development, the Sustainability Appraisal (SA) and the Strategic Housing and Economic Land Availability Assessment (SHELAA), are both evidence-base documents, not policy in themselves, and they must be based on correct, up-to-date, and proportionate information. If they contain errors, omissions, or unjustified assumptions, those flaws can be used to argue that a site should not progress to become an allocation.

It has been found that the SHELAA and Sustainability Appraisal do contain errors, omissions and unjustified assumptions for some sites and when corrected, these sites become less suitable to qualify as an allocation.

Wealden has published a very large amount of information to support the plan policies, the site allocations and the potential alternative options for this focussed plan. Much of this relates to the Sustainability Appraisal, which is a legal requirement, but the volume does make it quite a challenge to locate specific information.

This note contains a large amount of information, much of which however, is for information having been pasted from Wealden’s documentation. It is hoped that this note will assist readers understand the requirements for sustainability, point to where the information can be found in the supporting documentation and provide a guide to constructing a consultation response that demonstrates that the chosen site(s) is not suitable for development.

The Consultation

All the Reg.18(2) plan documents, questionnaire and guidance notes can be accessed on Wealden's website². At the bottom of this local plan page at this link, there are further links to the previous 2024 Reg.18(1) consultation documents and the 2020 Direction of Travel consultation.

This Reg.18(2) consultation contains 11 new or revised policies from the Reg.18(1) plan. Each of the 11 policies is followed by a question, generally along the lines of "Do you agree with updated Policy XYZ and if not, why not?"

At the end of the plan are a further four questions with Question 12 asking about the draft (option) site allocations.

The questions are listed in Appendix A at page 31 below in this note together with the new policies introduced in this Reg.18(2) focussed plan.

The questions can be answered online through the portal³, submitted via e-mail, or hard copy by post. It is recommended that if the portal option is used that the answers are first drafted and then pasted once complete into the relevant answer box rather than being typed directly into the box.

Wealden say that there is no need to re-submit comments made for the 2024 consultation, but unless it is clear that these comments have been addressed in this Reg.18(2) plan, it may be safer to resubmit.

In the 2024 consultation, Wealden said they would welcome comments from landowners, agents and developers whose sites had not been selected for an allocation in the Reg.18(1) plan. Submissions were made and have been reviewed by Wealden who have now decided that some sites deemed unsuitable two years ago are now suitable. But the reverse does not appear to have happened i.e. comments that attempted to show that some allocated sites were unsuitable do not appear to have been recognised in the Reg.18(2) plan. Wealden has been asked to confirm this position, but so far, they have not responded. Fletching Parish Council has complained about this omission and is re-submitting its 2024 response as part of its 2026 submission.

² [New Local Plan - Wealden District Council](#)

³ [Consultation portal](#)

Appendix A at page 31 below contains details cut and pasted from the draft Reg.18(2) plan containing the new/revised policies followed by the question on this policy. In summary:

Question	Related Policy
1	SS1 Spatial Strategy for Wealden
2	SS2 Provision of Homes
3	SS3 Gypsy, Traveller and Travelling Showpeople
4	SS4 Retail Provision & Town Centres
5	SS5 Provision of Employment Floorspace
6	SS6 Strategic Employment Allocations
7	CC8 Sustainable Drainage & Protection of the Pevensey Levels
8	CC9 Coastal Change Management Area
9	HO8 Affordable Housing
10	HO9 Gypsy, Traveller and Travelling Showpeople - Site Criteria
11	SA1 Housing & Mixed Use Site Allocations
12	- Draft (Option) Site Allocations

This guidance note concentrates on assisting with answering questions 11 & 12 above.

For those site allocations included in the 111 sites listed in Appendix C (shown in page 58 below), should be answered in Question 11 b)

For those draft site allocations (option sites) listed in Appendix D below (page 66), should be answered under Question 12.

Reg. 18(2) Spatial Strategy.

The government requires that local planning authorities plan to meet their so-called local housing “need”. This need is not the need of the Wealden planning area, but a government imposed figure which bears little resemblance to reality. The government requires the need to be calculated by their over-simplistic, one size fits all, standard method formula.

In December 2024, the formula used for the standard method was amended and the new calculation now starts with the number of houses to be provided each year to be equal to 0.8% of the existing stock. This figure is then enhanced with an affordability factor. For Wealden, the 0.8% is 599 houses/year before the ludicrous affordability factor then increases this to 1,457 houses/year, which results in a whopping 24,769 houses being required to 2042. Wealden’s current housing stock is 75,050 houses showing the potential massive increase over the next 16 years.

Just for context, the current Wealden Local Plan adopted in 2013 that planned for the period 2006 – 2027, contained a requirement for 450 houses/year.

The standard method current at the time of the 2024 consultation required just under 1,200 houses/year.

The Reg.18(1) plan from 2024 contained a housing requirement (the requirement being the number of houses included within the plan), of 953 houses/year for the period October 2023 – March 2040, making a total of 15,729 houses overall. This was 4,071 houses less than the government figure of “need” at the time of 19,800 houses. Wealden considered that they could not achieve this “need” figure due to a lack of sustainable sites being put forward by landowners and developers.

In parallel with the Reg.18(1) consultation, Wealden held a further Call for Sites exercise seeking more sites in an effort to be able to get closer to the government housing figure of “need” and several of those new sites are now included within this Reg.18(2) version of the plan, either as an allocation or as an option site. Wealden has also re-assessed the sites deemed as unsuitable by the 2024 SHELAA process and a number of these sites are now considered suitable and are either allocated in the plan or comprise an option site.

The overall number of houses currently included within the Reg.18(2) plan through Policy SS2 is now 16,609, or 977/year.

These 16,609 houses to 2042 are made up as follows:

Source of housing supply	Number of dwellings
Commitments (net) as of 1 April 2025	7,845
Windfalls including suitable SHELAA sites located within development boundaries (not allocated)	2,000
Local Plan draft allocations	6,764
Total housing supply	16,609
Dwellings Per Annum	977

Source: page 68 Draft Local Plan February 2026.

(Commitments are those sites with existing planning permission).

The 6,764 draft allocations in the above table includes 1,500 houses for Owlsbury Farm. However, Wealden is apparently concerned with the potential ecological impact of the Owlsbury site and also the connection to Uckfield’s services. They have an alternative scenario under consideration that excludes the Owlsbury site.

It should be noted that the proposed housing numbers in the table above are those intended to try to achieve meeting Wealden’s so-called local housing “need”. But the NPPF also requires local planning authorities (LPAs)s to try and help meet their neighbour’s unmet need where possible. Tunbridge Wells has just adopted a new plan which fails to meet their need. Eastbourne is currently undertaking a Reg.18 consultation, but will be certainly unable to meet their need as being an approximately triangular shaped area with the sea and the South Downs on two sides and the third side is either built out to the boundary or is in flood zone 3. Similarly, nor will Rother which is mostly in the National Landscape. Other neighbouring LPAs e.g. South Downs National Park, Lewes, Mid-Sussex etc, also are likely to face a shortfall and will be looking to their neighbours, including Wealden, to help with their need. Thus Wealden will come under pressure from the Planning Inspectorate not only to meet their standard method “need” of 24,769 houses, but to potentially considerably increase their housing requirement to help some or all of neighbouring authorities with their unmet need.

Proposed New housing by parish

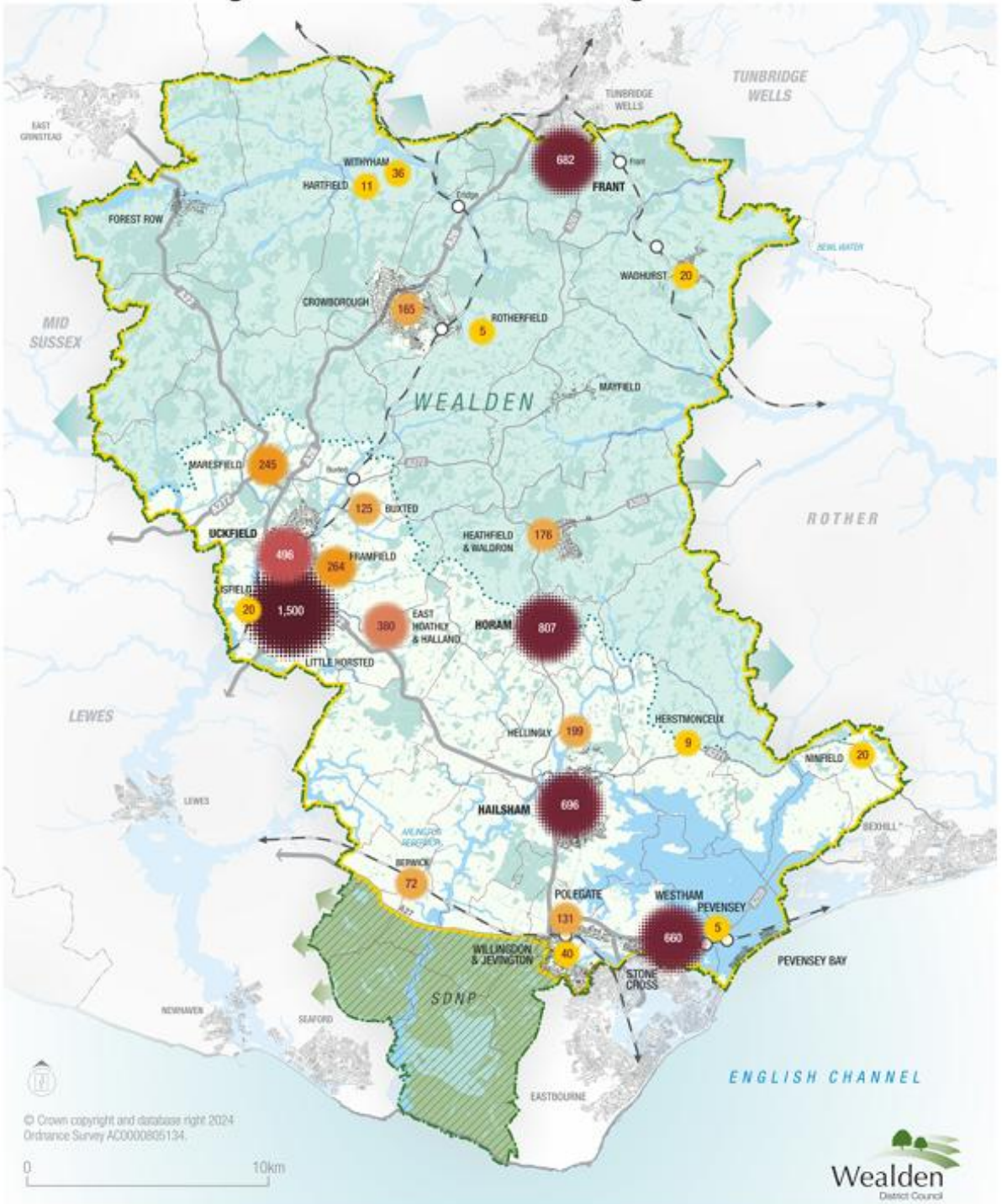
24 Town/Parishes in Wealden's LPA area have been assessed as suitable in the Reg.18(2) plan to receive a share of the allocations totalling 6,764 houses.

14 Town/Parishes in Wealden's LPA area have not had sites considered suitable for development submitted, although the settlements have been assessed as suitable for a share of the 2,000 windfall houses. (Windfall sites being those small sites that have not been considered in the local plan)

Three Parishes (Alfriston, Alciston and East Dean) have not been allocated any housing as they are within the South Downs National Park planning area.

The Reg.18(2) local plan includes at pages 71 – 73, a table (included in Appendix B at page 54 below) that shows the number of houses (broken down into commitments, windfalls and allocations) for each town/parish in the district.

These proposed parish allocations are indicated on the map below with unsurprisingly, the Low Weald taking the bulk of the new housing:



Existing Assets

- Wealden District Boundary
- Local Plan Area
- Major A Roads
- Minor A Roads
- Rail
- Rail Stations
- South Downs National Park (SDNP)
- Woodland
- Water
- High Weald National Landscape
- Administrative Boundary

Housing Allocations

- 1 - 50 Allocations
- 51 - 200 Allocations
- 201 - 300 Allocations
- 301 - 400 Allocations
- 401 - 500 Allocations
- 501 - 900 Allocations
- 900+ Allocations

Allocations by site

The table in Appendix C at page 58 of this note below shows the 111 sites selected for an allocation in the February 2026 Reg.18(2) draft plan. (The further 10 sites that have been struck through are those that have now received planning permission).

All of these allocation sites will have successfully made it through the SHELAA assessment process and the sustainability appraisal process.

Once the plan has been adopted, it is almost certain that all the allocated sites that are in the plan will be subsequently granted planning permission.

The Four Spatial Options

Local Planning Authorities are legally required to investigate and assess “reasonable alternatives” to their spatial strategy and site allocations because of the Strategic Environmental Assessment (SEA) Regulations 2004 and the National Planning Policy Framework (NPPF). Thus, Wealden’s Sustainability Appraisal⁴ and Spatial Strategy Topic Paper⁵ consider a further four Spatial Options for housing and employment land, with the housing numbers therein being either 15,612 houses, 19,011 houses, 22,211 houses or 24,911 houses.

The four options are shown on page 30, Sustainability Appraisal Part 1 January 2026 and reproduced at page 11 below.

The four spatial options are described in detail on pages 31 – 39 in the Sustainability Appraisal document with the preferred option being shown on page 40.

⁴ [Wealden District Council SA Reg18\(2\)](#)

⁵ [Spatial Strategy Topic Paper](#)

HOUSING NEED:

Total Homes - 24,769 (net) homes

Completions + Commitments - 7,845 (net) homes

Windfalls - c. 2,000 homes

Residual Need - 14,924 homes

EMPLOYMENT NEED:

Total Employment - 194,400 sqm

Residual Need - 167,290 sqm

[+ Potential Eastbourne Need - 23,184 sqm]

OPTION 1: 15,612 homes (63% Housing Need)

+ employment 175,421 sqm (90% Employment Need)

.....

OPTION 2: 19,011 homes (77% Housing Need)

+ employment 205,421 sqm (106% Employment Need)

.....

OPTION 3: 22,211 homes (90% Housing Need)

+ employment 262,421 sqm (135% Employment Need)

.....

OPTION 4: 24,911 homes (100.6% Housing Need)

+ employment 315,921 sqm (163% Employment Need)

Only **Option 1 (15,612 houses)** is broadly similar in number to the number of houses (15,729 houses), in the Reg.18(1) consultation in 2024 with the other three options containing considerably more housing and employment land.

Option 1 contains all the sites deemed suitable in the Reg.18(1) plan, plus Owlsbury Farm, plus the updated sites since the Reg.18(1) plan and the extension to Ashdown Business Park. It also includes two sites previously rejected in the Reg.18(1) plan.

Despite acknowledging that Option 1 would have the smallest impact on the landscape and character of Wealden's towns and villages, it was nevertheless rejected as it failed to meet the standard method "need" for housing and the full employment need.

Option 2 (19,684 houses) also fails to meet the District's housing "need" and although the District's employment "need" will be met, the provision of sufficient additional employment land to assist Eastbourne with their unmet need is uncertain.

This option includes the Reg.18(1) sites, plus the updated sites since Reg.18(1), includes some sites that were dismissed at Reg.18(1) stage, plus the 1,075 houses at West of Polegate. Employment land along the A22 corridor north of Boship is included. It does not include Owlsbury or the Ashdown Business Park extension. However, it does include seven sites rejected in the Reg.18(1) plan.

The option is likely to have environmental impacts, but it is reckoned by Wealden to also have less beneficial social and economic impacts as a result of more constrained development (whatever that means). Option 2 is therefore rejected by Wealden.

Option 3 (22,211 houses) will meet most (90%) of the District's Housing "need" and all (135%) the Employment need, including provision for Eastbourne's potential unmet employment needs. The option will result in environmental impacts, but Wealden considered that many of these could be mitigated – quite how, is not stated and it is very difficult to imagine how this could realistically be achieved. Wealden consider this option will also result in positive social and economic impacts as a result of new development. The option is therefore taken forward by Wealden for consideration at Regulation 19.

This option includes the Reg.18(1) sites, plus the updated sites since Reg.18(1), reconsiders sites dismissed at Reg.18(1) stage, the 1,500 houses at Owlsbury, plus the 1,075 houses at West of Polegate and the 1,500 houses West of Hailsham. However, 11 of the sites were previously rejected as unsuitable in the Reg.18(1) plan. Employment land includes Ashdown Business Park and North of Polegate.

Option 4 (24,911 houses) This option will meet **more** than the District's Housing (106%) and Employment (163%) need, including provision for Eastbourne's unmet employment need. The option will result in greater environmental impacts but Wealden consider that some of these could be mitigated, although again they don't say how. Wealden suggest the option will also result in positive social and economic impacts as a result of development and identifies areas for future growth beyond the Plan period. The option is therefore taken forward by Wealden for consideration at Regulation 19 with a housing number currently that is approximately 60% greater than that in Policy SS2.

This option includes the Reg.18(1) sites, plus the updated sites since Reg.18(1), reconsiders sites dismissed at Reg.18(1) stage, the 1,500 houses at Owlsbury, the 1,500 houses West of Hailsham, the 925 houses at Hesmonds Stud (3,000 total) and 925 houses at Laughton (4,000 total). This option includes 13 sites that were previously rejected in the Reg.18(1) plan. Employment land includes Ashdown Business Park, North of Polegate and employment land in the new settlements.

Wealden's Preferred Spatial Option identified in the Sustainability Appraisal for the Spatial Strategy options for this focussed Reg.18(2) plan is confirmed as Options 3 & 4. These are for 22,211 houses or 24,911 houses respectively. Therefore, although Policy SS 2 contains 16,609 houses, it is apparent that the Reg.19 plan due in the summer will most likely contain a considerably higher housing requirement as well as an over delivery on employment land of between 135% or 163%.

Thus, it is clear that the capacity constraints described in the Reg.18(1) consultation in 2024 resulting in a housing requirement of 15,729 houses have apparently evaporated as a result of the re-assessment of sites previously considered unsuitable and the consideration of newly submitted sites. Whereas, some of the strategic sites include in Spatial Options 3 & 4 are shown as rejected in the Part 3: Strategic Sites Sustainability Appraisal⁶, it is not clear how the sustainability of these rejected sites can be legitimately improved. Nevertheless, Wealden remains very likely to proceed to the Reg.19 plan in the summer with a far greater housing number than the 16,609 houses currently included in Policy SS 2.

⁶ [*WDC Local Plan Part 3 - Strategic Site Assessments](#)

Sites	Option 1	Option 2	Option 3	Option 4
Reg.18(1) housing & employment sites	✓	✓	✓	✓
Updated housing sites/numbers since Reg.18(1)	✓	✓	✓	✓
Reconsideration of dismissed Reg.18(1) sites		✓	✓	✓
*Owlsbury (1,525)	✓		✓	✓
*West of Polegate (1,075)		✓	✓	
*West of Hailsham (1,500)			✓	✓
*Hesmonds Stud (925 to 2042, but 3,000 total)				✓
Laughton (925 to 2042, but 4,000 total)				✓
*Ashdown Business Park extension (60,000m2)	✓		✓	✓
*North of Polegate (87,000m2)			✓	✓
A22 employments sites Upper Dicker		✓		
Employment sites in new settlements (53,500m2)				✓

It should be noted that sites with an asterisk in the table above (viz: Owlsbury, West of Polegate, West of Hailsham, Hesmonds Stud, Ashdown Business Park and North of Polegate), were all rejected as unsuitable in the SHELAA assessment for an allocation in the Reg.18(1) plan whereas Laughton is a new site not put forward for the Reg.18(1) plan.

The asterisked sites continue to be shown as not deliverable or developable i.e. rejected, in the 2026 SHELAA.

Appendix D at page 66 below contains a summary of the 27 potential option sites of which 14 are option strategic sites i.e. those sites with more than 50 houses, with the others containing 5 – 49 houses.

The Spatial Strategy Topic Paper at page 10, under the heading of “Preferred Spatial Option for the ‘Focused’ Regulation 18 Local Plan” confirms that:

3.10 The assessment of these Spatial Options shows that Spatial Options 3 and 4 are the best performing options for the Spatial Strategy in order to meet the district’s housing and employment needs, albeit that there will be environmental impacts resulting from such options (albeit, this could be mitigated, at least in part.)

No details of the potential mitigation is given and there must be doubts whether it could be effective.

The table below at page 16 copied from page 31 of Part 1: Sustainability Appraisal shows the potential strategic sites under consideration for the Reg. 18(2) plan. The table shows whether or not the site was included within the Reg.18(1) plan, its status then and its current status. At the right of the table, it is shown under which of the spatial options each site is being considered.

PARISH		SETTLEMENT	REF. NO.	ADDRESS	DEVELOPERS PROPOSALS	DEVELOPER / (AGENT)	SA REG. 18(1)	SELECT / REJECT	Option 1	Option 2	Option 3	Option 4
01	Arlington	Hailsham	825/1310	Land to north-west of Hempstead Lane	1,500 homes in plan period (Total 2,500); 1 Primary School; New Community Facilities	Grosvenor	Y	Reject				
02	Crowborough	Crowborough	1026/1110	Land at Beechenwood Farm	120-150 dwellings; 1.79 ha green infra. & SANGS	Greymoor Homes	Y	Reject				
03	East Hoathly W/ Halland	East Hoathly	996/1950	Hesmonds Stud	925 homes in plan period (Total 3,000); 23,500 sqm emp.; 1 new primary / nursery provision; new secondary provision	Hesmond Studs (Parker Dann)	Y	Reject				
04	East Hoathly W/ Halland	East Hoathly	1235/1950	Land at Laughton Park Farm (NEW)	925 homes in plan period (Total 4,000); 30,000 sqm employment; 2 primary schools; new community centre		N					
05	Framfield	Uckfield	127/1410	Land at Birds in Eye (North), Bird in Eye Hill	240 homes; 1,000 sqm employment	Martin Grant Homes (Turley)	Y	Reject				
06	Framfield	Uckfield	400/1410	Land at High Cross Farm, Eastbourne Rd	450 homes	Thakeham	Y	Reject				
07	Framfield	Uckfield	725/1410	Land at Hempstead Lane (NEW)	300 homes; 1 2FE Primary school, Community Hub	Martin Grant Homes/ Harcourt Devts. (Turley)	N					
08	Frant	Tunbridge Wells	729/1610	Land at Ramsye Farm (Spratsbrook Farm)	700 homes; Community facilities	Dandara (Stantec)	Y	Reject				
09	Frant	Tunbridge Wells	979/1610	Pinewood Farm, Frant Road	690 homes	(Savills)	Y	Select				
10	Frant	Tunbridge Wells	755/1610	Tunbridge Wells Rugby Club & Chase Farm	105 homes	Esquire Developments		Select				
11	Frant	Tunbridge Wells	1201/1610	Tunbridge Wells Rugby Club & Chase Farm	240 homes; Redevelopment of Sports Pavilion / facilities	Esquire Developments		Reject				
12	Hailsham	Hailsham	1115/1310	Land east of A22, Hailsham	1,000 homes; 16,750 sqm employment	Polegate Land	Y	Rej Sel				
13	Horam	Horam	875/3030	Coxlow Farm, Horam Road	750 homes; 4,000 sqm emp.; 1,500 Community floorspace; 1 2FE Primary school; Community Hub; Country Park	Gladman Developments	Y	Select				
14	Maresfield	Maresfield	980/3120	Ashdown Business Park Extension	Employment (60,000 sqm)	Summerthorne Estates (MJB Architecture)	Y	Reject				
15	Polegate	Polegate	1069/1510	Polegate West	1,075 homes (Total 1,500)	Taylor Wimpey (Turley)	Y	Reject				
16	Polegate	Polegate	204/1510	Polegate West	230 homes	Taylor Wimpey (Turley)	Y	Reject				
17	Polegate	Polegate	896/1510	Land at North Polegate, A22	Employment (87,000 sqm)	Formula Land (Framptons)	Y	Reject				
18	Uckfield	Little Horsted	1061/1410	Owisbury	1,525 homes in plan period (Total 1,700); 60 ha SANGS; emp. / community space; 1 2FE Primary School / nursery provision	Fairfax Properties (Enplan)	Y	Reject				
19	Uckfield	Ringles Cross	1007/1410	Land at White House Farm, London Rd	240 homes	-	Y	Select				
20	Uckfield	Uckfield	1232/1410	Hempstead Farm, Uckfield (NEW)	200 homes; retirement care facility; improved sports provision	Hempstead Farm (DHA Planning)	N					
21	Westham	Westham	1099/3360	Land at Peelings Lane, Westham	240 homes	Bellway (DHA Planning)	Y	Select				
22	Westham	Stone Cross	1132/3280	Sharnfold Farm, Hailsham Rd, Stone Cross	400 homes; 500 sqm open space / play space	(Ridge)	Y	Select				

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Sustainability requirements for the Local Plan

The National Planning Policy Framework⁷ (NPPF) requires all new development to be sustainable. It defines sustainability as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”.

The NPPF establishes sustainable development as the purpose of the planning system. Plans must pursue economic, social, and environmental objectives in an integrated way. This is set out in the “Achieving sustainable development” section of the NPPF at pages 5 - 7.

Local plans must shape development patterns that:

- Make efficient use of land
- Reduce the need to travel
- Support walking, cycling, and public transport
- Take climate change mitigation and adaptation into account
- Protect and enhance the natural environment

These requirements flow from the NPPF’s overarching sustainable development duty and the plan-making section (NPPF paras 15–38).

When selecting sites, plan-makers must focus development in locations that are, or can be made sustainable. This includes:

- Access to services and facilities
- Access to public transport
- Minimising reliance on private car use
- Locating growth where it can be supported by existing or planned infrastructure

Plans must consider the environmental capacity of the location and avoid or minimise:

- Flood risk
- Harm to biodiversity
- Landscape harm

⁷ [National Planning Policy Framework](#)

- Impacts on heritage assets
- Carbon-intensive patterns of development

The December 2024 NPPF update strengthens the climate dimension, making climate mitigation and adaptation central to plan-making.

Plans must ensure that development is supported by:

- Transport infrastructure
- Utilities
- Social infrastructure (schools, health, community facilities)

This is part of ensuring that sites are deliverable and sustainable.

The NPPF update explicitly elevates climate change to a material consideration in plan-making, requiring:

- Site choices that reduce emissions
- Patterns of development that support low-carbon travel
- Resilience to climate impacts (heat, flooding, water stress)

This reinforces the requirement that unsustainable locations should not be allocated unless they can be made sustainable through infrastructure or mitigation.

In practice, the NPPF requires that site allocations must:

1. Be in sustainable locations, or
2. Be capable of becoming sustainable through planned infrastructure, and
3. Support the NPPF's economic, social, and environmental objectives.

This is the basis on which Inspectors examine local plans.

Wealden's Sustainability Objectives

Wealden has developed 20 sustainability objectives against which each of the Policies in the plan are tested. As every site allocated for development has its own Policy, each of the sites are also tested against the 20 sustainability objectives.

The 20 sustainability objectives are:

SUSTAINABILITY OBJECTIVES	
SO1	CLIMATE CHANGE MITIGATION
SO2	CLIMATE CHANGE ADAPTATION
SO3	FLOOD RISK
SO4	WATER RESOURCES & QUALITY
SO5	SOIL, LAND & MINERALS
SO6	WASTE
SO7	POLLUTION
SO8	GREEN & BLUE INFRASTRUCTURE
SO9	BIODIVERSITY
SO10	LANDSCAPE & TOWNSCAPE
SO11	HISTORIC & CULTURAL HERITAGE
SO12	DIGITAL INFRASTRUCTURE
SO13	TRANSPORT & ACCESSIBILITY
SO14	HOUSING
SO15	HEALTH & WELLBEING
SO16	QUALITY OF LIFE & PLACE
SO17	SOCIAL INCLUSION
SO18	ECONOMY & EMPLOYMENT
SO19	TOWN & VILLAGE CENTRES
SO20	EDUCATION & SKILLS

Appendix E (page 78 below) contains a table with details of the criteria used to assess the impact of the proposed development on each of the 20 sustainability objectives. The table also includes a list of sustainability indicators to be used for monitoring.

The first part of the table, that for SO1 Climate change mitigation, is shown below:

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?	
	1.3	Promote the use of decentralised, renewable and low carbon energy?	1.2 Per capita CO ₂ and total emissions in the local authority area, including the breakdown for buildings, industry and transport (Department of Energy and Climate Change)
	1.4	Support the provision of electric charging infrastructure to enable the take up of electric vehicles?	1.3 Car and van availability by household in the local authority area (East Sussex in Figures)
	1.5	that development is located in sustainable locations?	1.4 Publicly available electric vehicle charging devices at all speeds within the local authority area (Department for Transport)
	1.6	embodied carbon emissions in new buildings?	1.5 Increase (Ha) in community allotments/orchards (Council records)
	1.7	Reduce space heating demand in new buildings?	
	1.8	Encourage local food production?	
	1.9	Promote sustainable methods of construction and design?	

The criteria for the remaining objectives can be found in Appendix E at page 78 below

In the appraisal, the impacts of each policy/allocation on the individual objectives are assessed as follows:

Sustainability Appraisal Impacts	
Major Positive	
Minor Positive	
Uncertain	
Minor Negative	
Major Negative	
Not Significant	

Where sites have been currently assessed as uncertain, Wealden say that these sites will be re-assessed prior to the issue of the Reg.19 plan.

The SA matrix below is from page 197 of the Sustainability Appraisal Scoping Report January 2024⁸, where it is stated that it is not intended to actually score or weight (measure) the policy options during the SA process, but to provide an indication of the likely, and potentially likely significant effects of the Plan’s policies options when judged against SA Objectives. The system utilises symbols (also characterised by specific colours) to summarise the performance of an emerging Plan’s policy options in sustainability terms. NB: note the differing colour shades below – the shades in the chart on the page above will be used in the rest of this document.

Symbol	Impacts on SA Objective	Definition of impact
++	Major positive impact	The policy or site option is likely to have a major positive effect (i.e. enhance, improve, protect/conserves, restore, benefit) and/or contribute significantly to one or more key elements, features or characteristics of the sustainability objective being appraised?
+	Minor positive impact	The policy or site option is likely to have a minor positive effect (i.e. enhance, improve, protect, restore, benefit) and/or contribute moderately to one or more key elements, features or characteristics of the sustainability objective being appraised?
0	No significant impact	The policy or site option has no significant impact on the objective. There are no impacts anticipated on the sustainability objective being appraised, or any impacts anticipated are negligible.
-	Minor negative impact	The policy or site option is likely to have a minor negative effect (i.e. loss, harm or damage on one or more key elements, features or characteristics of the sustainability objective being appraised?)
--	Major negative impact	The policy or site option is likely to have a major negative effect (i.e. severe loss, harm or damage, or is unable to entirely mitigate one or more key elements, features or characteristics of the sustainability objective being appraised?)
?	Uncertain impact	The impact of the policy or site option is not known/unclear at this stage or is too unpredictable to assign a conclusive score at this stage of the plan making process. This is due to information not available at this time to understand/ determine the extent of either positive or negative impacts on one or more key elements, features or characteristics of the sustainability objective being appraised.

⁸ [Wealden-Scoping-Report-January-2024.pdf](#)

The site selection process

SHELAA

Every site submitted to Wealden for potential development is given a unique SHELAA number e.g. 1099/3360.

The SHELAA process is a high level view providing a technical assessment of the potential sites for allocation for future land supply.

The sites are assessed against the SHELAA criteria thus:

1. Is the site suitable for five or more dwellings? If not, it is not considered further.
2. Has the site received planning permission. If it has, there is no need for any further consideration.
3. Are the sites in a sustainable location i.e. can they meet the requirements of paragraph 8 in the NPPF of achieving sustainable development?
4. Does the site suffer from "absolute constraints" e.g. being largely covered by ancient woodland or in flood zone 3?

Sites are then assessed against Detailed Physical and Planning Constraints e.g. landscape impact, flood risk, connectivity etc.

Sites not subject to absolute constraints are then assessed for suitability, availability and achievability.

Full details of the methodology for the SHELAA site selection can be found at pages 6 – 24 in the SHELAA Main Report January 2026⁹

Sustainability Appraisal (SA)

Sites which make it through the SHELAA assessment are then subject to a sustainability appraisal.

The SA process is set out at in the Non-Technical Summary at pages 5 – 12 of the Part 1: Sustainability Appraisal Reg.18(2) document¹⁰. It is recommended that this summary is read before attempting to compile any comments to a site on sustainability grounds..

⁹ [SHELAA Main Report January 2026](#)

¹⁰ [Wealden District Council SA Reg18\(2\)](#)

Inaccurate sustainability appraisal scoring

There is a concern that some of Wealden's assessed impacts of development on some of the sustainability objectives has been rated too highly. It should be remembered that for any site to receive a positive rating, (major or minor positive) that the impact of the development on the specific objective should be positive. In many cases, Wealden has assessed a positive impact where none would be achieved.

The chart titled "Strategic Site Assessments: Summary of Results" from page 5 of Part 3: Strategic Site Assessments document is shown below at page 28 which includes the impact rating on each of the 20 sustainability objectives for the 22 strategic sites currently under consideration.

Two examples of the incorrect i.e. overgenerous scoring, are given for SO3 Flood Risk and SO9 Biodiversity, as shown below:

SO3 Flood Risk

Two sites have been assessed by Wealden where the impact of development is shown to be a major positive for flood risk. These two sites are at Land at Beechenwood Farm, Crowborough and Land at White House Farm, Uckfield. But looking at the detailed site appraisal for Beechenwood Farm at page 13 of Part 3: Strategic Site Assessment document, the very flimsy reason given for this major positive impact is:

The site lies within Flood Zone 1. No surface water flooding risk. Site not at risk of ground water flooding.

This comment for Beechenwood Farm is factually incorrect. The EA Flood Zone mapping includes for tidal and fluvial flooding, whereas surface water flooding arises from pluvial flooding, which is not part of the EA's flood zone classification. Similarly, ground water flooding is also not part of the flood zone classification. Therefore, only a low risk of tidal and river flooding can be assumed from the EA classification of the site at Beechenwood Farm being in Flood Zone 1.

The EA publishes maps called the Risk of Flooding from Surface Water (RoFSW), which show the potential flooding from pluvial events, but there is no indication that Wealden has consulted these maps to arrive at its conclusion of no surface water flooding.

Groundwater flooding is quite difficult to determine and requires extensive investigation and sometimes modelling. Wealden has not confirmed that

this depth of investigation has been undertaken which would be necessary in order to rule out groundwater flooding.

However, even if Wealden's comment on flood risk for Beechenwood Farm was factually justified, it still does not enable a major positive assessment for flood risk to be concluded. Should a low risk of flooding from any source to the undeveloped site be properly determined, it would be reasonable to presume that with proper attention being paid to SuDS measures, that the developed site would also have a low risk of flooding. Therefore, the flood risk pre and post development would be the same and the correct assessment of the impact of development would be "Not significant". The only reason for possibly assessing the flood risk from development as "Major positive" would be if the undeveloped site suffered from serious flood issues and these could be successfully mitigated by future development. As this is not the case for this site, the "Major positive" score is incorrect and it should be replaced by "Not significant".

The "Major positive" impact for White House Farm is assessed because:

The site lies wholly within Flood Zone 1. There are small areas of surface water flooding to the north-east corner and south-west tip which can be suitably mitigated. The site is not within an area of groundwater concern and there is no risk of groundwater flooding. There are no identified watercourses on site. Residential development is suitable in this location.

This wording suggests that the EA's RoFSW map may have been consulted for this site, but this is not confirmed. However, there is no detail with regard to how the potential surface water flooding in the two identified susceptible areas could be suitably mitigated.

The statement "there is no risk of groundwater flooding" is a very bold assertion given the large amount of data acquisition and modelling work necessary to understand the risk. The EA is able to show the susceptibility of areas to groundwater flooding, but they cannot show the probability of this occurring which relies on further investigative work. Wealden has not confirmed that they have undertaken the work necessary to establish the "no risk of groundwater flooding" so this statement is unable to be justified.

However, as with Beechenwood Farm above, even if Wealden's justification for the lack of flooding to that site, should this be the same for White House Farm, development of this site would not result in any

reduction in the risk of flooding. Therefore, the flood risk objective should be scored "Not significant " at best, certainly not "Major positive"

Seven other strategic sites have been scored as "Minor positive" for S03 Flood Risk. Picking one of these at random, that for Coxlow Farm, Horam, the justification for the minor positive score is:

Site is wholly within Flood Zone 1. There are some areas of surface water flood risk within the site but given the size of the site it is anticipated that suitable mitigation will be possible. The site is not affected by groundwater flooding. Mitigation measures will need to be provided for the site in terms of surface water runoff as development will introduce impermeable surfaces.

These Wealden comments are very similar to those above for White House Farm and similarly, the same CPRE/WGOD comments also apply. Thus, there is no justification to support a minor positive result for this site for flood risk and the score should be "Not significant" at best.

This is most likely to also apply to the other six sites currently showing a "minor positive" score.

SO9 Biodiversity

Most of the allocated sites and option sites are green field sites. However, there are a large number of these sites where urbanising these fields is assessed by Wealden to have a minor positive impact on biodiversity or even a major positive impact for three sites.

This post-development "improvement" in biodiversity may arise due to Wealden's requirement for biodiversity net gain – the government has required since 2024 for sites to show an increase of 10% in biodiversity whereas in this plan, Wealden are seeking a 20% gain. But to require anything above 10%, the government requires considerable justification and confirmation that it will not impact the viability of the allocated sites. To date, Wealden has not provided any justification for a BNG greater than 10% so this policy is very unlikely to survive the examination.

Therefore, for any site that is assessed as achieving a positive impact on biodiversity because of the intent that BNG should be 20%, this cannot currently be justified and the positive impact should be removed.

However, more importantly it should be remembered that achievement of a 10% (or any percentage) BNG **does not achieve an increase of that percentage of biodiversity of the site**. This is due to several factors:

1. Defra explicitly states that their BNG metric does not capture all ecological impacts. It only measures habitat condition and distinctiveness.
2. The BNG metric only measures a small proportion of the total biodiversity of the site. It does not measure soil biodiversity at all. Below ground biodiversity is vast – it is far greater than above ground biodiversity.
3. For most of Wealden’s rural landscape, soil biodiversity will comprise 40 – 60% of the total biodiversity of the site. With between 50 – 80% of the pre-existing topsoil removed from site during development, this means between 20 – 48% of the pre-existing biodiversity is removed from site during development. This loss is not considered in the BNG calculation.
4. Defra’s metric does not measure areas like:
 - Disturbance e.g. light pollution, vehicles, human, dogs etc.
 - Predation, predominantly by cats
 - Habitat fragmentation
 - Hydrological effects e.g. changes in drainage, SuDS, etc.

Thus, it can be concluded that even should a 20% BNG be required by the new plan, that developing any rural site will result in a large loss of the existing biodiversity. Therefore, without considerable additional supporting information, it should not be possible to conclude that developing any rural site in Wealden will result any positive impact to biodiversity; most likely, development will result in a biodiversity loss.

Most of the strategic sites on page 28 below are shown with an “Uncertain” score against SO9 Biodiversity. It is considered that given the considerable shortfall in the method for measuring BNG, that the impact of developing a rural site in Wealden would have a negative impact on the biodiversity of that site and the only unknown would be whether that negative impact would be major or minor.

It is thus considered that there is likely to be an optimistic assessment against a number of the other 18 sustainability objectives.

STRATEGIC SITES SUMMARY		Sustainability Objectives																						
Ref. No.	Address	SO1 Climate Change Mitigation	SO2 Climate Change Adaptation	SO3 Flood Risk	SO4 Water Resources	SO5 Soil, Land & Minerals	SO6 Waste & Materials	SO7 Pollution	SO8 Green & Blue Infrastructure	SO9 Biodiversity	SO10 Landscape & Townscape	SO11 Historic & Cultural Heritage	SO12 Digital Infrastructure	SO13 Transport & Accessibility	SO14 Housing	SO15 Health & Wellbeing	SO16 Quality of Life & Place	SO17 Social Inclusion	SO18 Economy & Employment	SO19 Town & Village Centres	SO20 Education & Skills	18(1)	18(2)	
ARLINGTON																								
825/1310	Land to north-west of Hempstead Lane																					R	P	
CROWBOROUGH																								
1026/1110	Land at Beechenwood Farm																					R	P	
EAST HOATHLY WITH HALLAND																								
996/1950	Hesmonds Stud																					R	R	
1235/1950	Land at Laughton Park Farm (NEW)																					-	P	
FRAMFIELD																								
127/1410	Land at Birds in Eye (North), Bird in Eye Hill																					R	S	
400/1410	Land at High Cross Farm, Eastbourne Rd																					R	P	
725/1410	Land at Hempstead Lane (NEW)																					-	P	
FRANT																								
729/1610	Land at Ramslye Farm (Spartsbrook Farm)																					R	P	
979/1610	Pinewood Farm, Frant Road																					S	S	
755/1610	Tunbridge Wells Rugby Club & Chase Farm																					S	S	
1201/1610	Tunbridge Wells Rugby Club & Chase Farm																					R	S	
HAILSHAM																								
1115/1310	Land east of A22, Hailsham																					R	S	P
HORAM																								
875/3030	Coxlow Farm, Horam Road																					S	S	
MARESFIELD																								
980/3120	Ashdown Business Park Extension (EMP - Maresfield)																					R	P	
POLEGATE																								
1069/1510	Polegate West																					R	R	
204/1510	Polegate West																					R	R	
896/1510	Land at North Polegate, A22 (EMP)																					R	S	
UCKFIELD																								
1061/1410	Owsbury (Little Horsted)																					R	S	
1007/1410	Land at White House Farm, London Rd																					S	S	
1232/1410	Hempstead Farm, Uckfield (NEW)																					-	P	
WESTHAM / STONE CROSS																								
1099/3360	Land at Peelings Lane, Westham																					S	S	
1132/3280	Sharnfield Farm, Hailsham Rd, Stone Cross																					S	S	

Demonstrating an allocated site is unsustainable

All sites submitted to Wealden for potential development are first assessed by the SHELAA process.

Subsequently, all sites that not discarded by the SHELAA process are assessed for sustainability via the sustainability appraisal.

Sites deemed sustainable are considered suitable to be allocated for development.

It is considered that Wealden's SHELAA site assessment and sustainability appraisal do not accurately reflect the impact of developing the sites. A more accurate assessment may show that the site lacks sustainability and therefore should not be allocated for development.

Steps to follow to check whether sites have been assessed to generously:

1. Find the site SHELAA reference number e.g. 1099/3360 from Appendix C page 58 below noting both the SHELAA and the allocation policy reference (if provided).
2. Find the site in the SHELAA Appendix 1: Parish Site Summaries¹¹. The sites are grouped by Parish (not settlement) which are in alphabetical order. Within each Parish section, the sites are listed numerically based on the first set of digits in the SHELAA reference number.
3. Look at the reasons whereby this site is considered suitable for development.
 - Do you agree with these reasons? If not, why not?
 - Are there any reasons not considered i.e. an omission of a material fact(s)? If so, what are these?
4. If the site is shown in bold in the table on page 58 below, then the sustainability appraisal for that site will be in Appendix B – Detailed Site Assessments in Part 2 Sustainability Appraisal, Parish Site Assessments.¹² This large document does not have an index, but the sites are listed alphabetically by Parish.
5. If the site is shown with a green background in the table on pages 58 - 65 below, then this site is one of the 22 strategic sites appraised in the

¹¹ [SHELAA-Jan-2026-Appendix-1-Site-Assessments.pdf](#)

¹² [WDC Local Plan SA Part 2 - Appendix B Site Assessments](#)

separate volume Part 3: Sustainability Appraisal¹³ This volume does have an index with the sites again listed alphabetically by Parish.

6. A sustainability appraisal has not been undertaken for seven of the 27 Option Sites listed in Appendix D, page 66 below, meaning that for these seven sites it will not be possible to critique these sites in detail. However, there is information in the SHELAA which can be used.

7. For each of the 20 sustainability objectives for the chosen critiqued site:

- Do you agree with the reasons for the assessed score? If not, why not? What score would you assess?
- Are there any reasons not considered e.g. an omission of a material fact(s)? If so, what are these? How would these new points affect Wealden's score?

8. It is important to recognise that some or even all of the option sites could be considered suitable as an allocation in the Reg.19 plan. Therefore, Wealden's sustainability appraisal (or the SHELAA if the site has not been appraised) should also be critiqued for these sites.

Critique example

A critique of site WES 7 in Westham was undertaken for the 2024 consultation and this critique can be found at Appendix F at page 90 below. It is considered that this critique shows up several areas where Wealden's assessment is not correct and the site therefore lacks the sustainability necessary to be able to qualify as an allocation.

¹³ [WDC Local Plan Part 3 - Strategic Site Assessments](#)

Appendix A

Wealden draft Reg.18(2) Local Plan Policies & Questions

The policies and questions shown below have been cut and pasted from the Reg.18(2) Draft Wealden Local Plan.

Chapter 03 Spatial Policies

Why are we consulting on these Policies?

Following the publication and consultation of the draft Wealden Local Plan (Regulation 18) in March 2024, a significant update to the NPPF around the provision of new homes came into force. We have considered those changes to the NPPF (summarised below) and its impact on both policy SS1 Spatial Strategy for Wealden) and policy SS2 (Provision of Homes). The issues and actions are presented below:

1. A new 'standard method' for assessing housing need was introduced in the NPPF (December 2024) using both local housing stock figures and the median affordability ratios. In Wealden District, the housing stock has grown by around 10.5% in the last ten years and we have the highest affordability ratio in East Sussex. As a result, the local housing need figure has significantly increased from 1,200 dpa at the time of the publication of the draft Wealden Local Plan (Regulation 18) in March 2024, to 1,457 dpa at the time of publication of this 'focused' draft Wealden Local Plan (Regulation 18).
2. Additionally mandatory housing targets were reintroduced for plan-making purposes, replacing the 'advisory' approach and removing the reference to 'exceptional circumstances' in which the use of alternative approaches to assessing housing need may be appropriate.
3. Due to the above changes, the Council sought an update to its Local Housing Needs Assessment (LHNA), which was last published in 2022. The conclusions of the LHNA report on both general and specialist housing need is to be considered further at the Regulation 19 stage.
4. In addition, the Council has now published its update to the Employment and Economic Study for Eastbourne and Wealden (January 2026) that has considered the study period from 2025 to 2042, including a reassessment of the Functional Economic Market Area (FEMA) for Wealden, as well as the office floorspace requirements, and the industrial and warehouse floorspace requirements.

The issues above prompted the Council to carry out further site assessment work and testing both the spatial strategy options and other available sites to meet a greater proportion of local housing and employment need. This 'focused' draft Wealden Local Plan (Regulation 18) includes additional housing/employment allocations, above and beyond those identified in the previous Regulation 18 Local Plan (March 2024), alongside several potential housing/employment allocations to be considered between now and the Regulation 19 stage.

Finally, the changes to this policy provided the opportunity to respond to some feedback received during the previous public consultation on the draft Wealden Local Plan (March 2024), which challenged the methodology, accuracy and technical approach in some elements of housing provision and spatial strategy of the Plan as previously drafted.

Policy SS1: Spatial Strategy for Wealden

Sustainable Development

1. The Council will expect development proposals and the use of land to contribute positively to the social, economic and environmental enhancement of Wealden. Planning

applications that are consistent with the policies in the plan will be supported, unless material considerations indicate otherwise.

General Principles

2. During the plan period up to 2042 the Local Plan will:
 - a) Deliver sustainable and high-quality development that meets the needs of our communities for homes and jobs, whilst balancing the impact of growth on our natural environment, protected landscapes and the countryside.
 - b) Contribute to the continued sustainability of our towns and villages. This will involve supporting the improvements that are required to local services, community facilities and infrastructure. Subject to other policies in the plan, we will safeguard our existing employment and tourism sites and seek to deliver new employment and tourism sites, ensuring that people can access jobs, services and facilities locally.
 - c) Support our towns and villages to be 'complete, compact and connected neighbourhoods' to help provide health, social, environmental and economic benefits to our communities.
 - d) Support Neighbourhood Plans where Parishes have designated such areas for this purpose, including supporting site allocations for housing and employment purposes, providing such developments are consistent with the policies in this plan.

Development Boundaries

3. Subject to other policies in the plan, new development will be permitted within those settlements with an identified development boundary as shown on the Policies Map. This includes the following settlements:

Crowborough, Uckfield, Hailsham, Heathfield, Polegate, Willingdon, Stone Cross, Westham, Pevensey, Forest Row, Horam, Mayfield, Wadhurst, Bells Yew Green, Berwick Station, Blackboys, Buxted, Cross in Hand, East Hoathly, Five Ash Down, Framfield, Frant, Groombridge, Hartfield, Herstmonceux, Isfield, Lower Horsebridge, Maresfield, Ninfield and Rotherfield.

4. Within these settlements, development proposals should make the best use of previously developed land, apply an appropriate density to its use, ensure the creation of strong, sustainable, cohesive and inclusive communities including required infrastructure provision. Development proposals should also consider land take and the impact this may have on the natural environment and resources, whilst also relating well to the existing and surrounding character of the area.

Employment

5. The Council will support economic development proposals which deliver a growth in high-skilled jobs and/or an expansion of tourism that contributes towards the delivery of sustainable economic prosperity in the district.
6. New strategic employment floorspace will be allocated for development within this local plan in line with policy SS6 (and the district's strategic employment sites will also be protected, alongside non-strategic employment land). Improvements to existing

strategic employment sites (redevelopment, conversion, upgrading, intensification or reconfiguration) will also be supported where this meets other policies in the plan in order to meet the district's employment need. These sites will contribute to meeting an increase in employment land and jobs within the plan period.

District, Service and Local Centres

7. The role of our district, service and local centres will be protected and enhanced by encouraging a range of uses consistent with the scale and function of the centre having regard to its position in the hierarchy. Retail growth during the plan period will be focused within these centres in accordance with the town centre hierarchy and policies TC1 (District, Service and Local Centre Hierarchy and 'Town Centre' First Principles) and TC2 (Sequential and Local Impact Test).

8. The Council will support improvements to district, service and local centres where this will support the vitality and viability of centres including improvements to the quality of our town centres and public realm, the provision of a diverse offer, the provision of community services, improvements to active travel infrastructure and the night-time economy. Development that is associated with the 'greening' of our town centres will be particularly supported.

Countryside

9. 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.

Question 1

- a) Do you agree with the updated draft Policy SS1: Spatial Strategy for Wealden, and if not, why?
- b) Is there an alternative spatial strategy that we should be considering through this Local Plan? If so, please set out what the alternative spatial strategy should contain and why?

Policy **SS2**: Provision of Homes

New homes

1. A housing target of 16,609 (net) dwellings will be delivered in the district between 1 April 2025 to 31 March 2042. The provision of homes will be met through committed schemes (with planning permission), site allocations within this local plan and windfall development, as set out in Table 4.
2. New housing (allocations and windfall) development is supported in the district's most sustainable settlements and will be located within the defined development boundary areas within the district, as defined on the Policies Map.

Question 2

- a) Do you agree with draft Policy SS2 (Provision of Homes), and if not, why?
- b) Do you agree with the list of potential sites, the amount of development, and/or the issues identified in tables 6 (alternative scenario) associated with draft Policy SS2 – Provision of Homes?

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

To meet the identified accommodation needs for Gypsies, Travellers and Travelling Showpeople within the District up to 2040, the Council will endeavour to make provision for 51 pitches for Gypsies and Travellers and 3 plots for Travelling Showpeople in accordance with the accommodation needs identified in the GTAA.

Question 3

- a) Do you agree with draft Policy SS3 Gypsy, Travellers and Travelling Showpeople – Accommodation Needs, and if not, why?
- b) Do you agree with the list of potential sites, the amount of development, and/or the issues identified in table 7 associated with draft Policy SS3 – Gypsy, Traveller and Travelling Showpeople – Accommodation Needs?

Retail provision and town centres

Why are we reconsulting on this Policy?

Policy SS4 (Retail Provision and Town Centres) is included in this 'focused' Regulation 18 Local Plan consultation as we have undertaken an update to the Council's previous Wealden Town Centre Study that was published in 2022. The previous Town Centre Study considered several issues associated with retail and town/village centres, including identifying a capacity for retail and leisure floorspace in Wealden over the study period, undertaking health check assessments for our main town and village centres, reconsidering town centre boundaries and primary shopping areas, as well as considering Local Impact Thresholds. Based on this evidence base, the Council published in its draft Wealden Local Plan (March 2024) that included policy SS4, alongside a draft chapter on Town Centres that presented the Council's retail hierarchy amongst other matters.

The Council has now published its Town Centre Study 2026⁵⁶ and this has considered the study period from 2025 to 2040, including a reassessment of the issues cited above. This has resulted in some changes to retail capacity within the district, and this has been reflected within amended policy SS4 (Retail Provision and Town Centres) below. It should be noted that the Town Centre Study (2026) has continued to support the policies identified within the previous Town Centre chapter of the draft Wealden Local Plan (March 2024) and therefore, the Council will revisit that chapter in the Regulation 19 version of the Local Plan, given that there are no significant changes to those issues.

The update also provides an opportunity to respond to key feedback received during the previous public consultation on the Regulation 18 draft Local Plan (March 2024). However, for policy SS4, this was limited and only minor amendments were suggested to supporting text, as well as alignment of the evidence base to the Plan period, which has been addressed.

Policy SS4: Retail Provision and Town Centres

The Council will support the provision of between 7,600 sqm and 9,700 sqm of convenience retail floorspace and between 7,600 and 11,900 sqm of comparison retail floorspace by 2040. This will be achieved within our District, Service and Local Centres as defined in Policy TC1 (District, Service and Local Centre Hierarchy and 'Town Centre' First Principles).

Question 4

Do you agree with the updated draft Policy SS4: Retail Provision and Town Centres, and if not, why?

Economy

Why are we reconsulting on these Policies

Policies SS5 (Provision of Employment Floorspace) and SS6 (Strategic Employment Allocations) is included in this 'focused' Regulation 18 Local Plan consultation as we have undertaken an update to the Council's previous Employment and Economic Study for Eastbourne and Wealden (April 2022). The previous Employment Study considered the study period between 2019 and 2039 and considered several issues associated with employment uses, most notably the Functional Economic Market Area (FEMA) for Wealden, as well as the office floorspace requirements, and the industrial and warehouse floorspace requirements. The study also provided an assessment of existing industrial estates within the district. Based on this evidence base, the Council published its draft Wealden Local Plan (March 2024) that included policies SS5 and SS6, alongside a draft chapter on the Economy, that presented several development management policies.

As discussed above, the Council has now published its update to the Employment and Economic Study for Eastbourne and Wealden (January 2026) that has considered the study period from 2025 to 2042, including a reassessment of the issues cited above, including our new Plan period. This has resulted in some changes to employment need within the district, and this has been reflected within amended policy SS5 (Provision of Employment Floorspace) and the preceding text below. The Council has also undertaken significant work on potential employment sites to be allocated within the emerging Wealden Local Plan, through both its SHELAA and SA process and this is reflected in policy SS6 (Strategic Employment Allocations).

The Council will revisit the wider Economy chapter in the pre-submission Regulation 19 version of the Local Plan, in view of the impending changes to the NPPF and to account for the update to our evidence base.

The update to these policies also provides an opportunity to respond to key feedback received during the previous public consultation on the Regulation 18 draft Local Plan (March 2024). In terms of statutory consultees, National Highways were supportive of the previous policy, subject to the site's being acceptable in transport terms, whilst neighbouring local planning authorities supported Wealden in terms of proceeding with a further 'Call for Sites' to find additional sites to meet demand, which has been considered in draft policy SS6 (Strategic Employment Allocation). However, there was also significant criticism of the previous evidence base who raised concerns on matters such as the use of the 'Past Take Up' method to identified demand for employment needs. All those issues have been reconsidered in the latest evidence base for the latest Plan period.

Policy SS5: Provision of Employment Floorspace

1. The Council will support the provision of at least 159,530 sqm of employment floorspace in use Classes E(g), B2 and B8 by 2042. This will be achieved through the following measures:

- a) The allocation of land as employment sites as listed within Policy SS6 Strategic Employment Sites;
- b) The delivery of existing commitments for employment uses, with the largest commitments (above 5,000 sqm) already identified in Policy SS6 Strategic Employment Sites;
- c) The retention of existing employment premises across the district and particularly strategic employment sites identified in Policy EC2: Existing Strategic Employment Sites;
- d) Supporting existing businesses through the provision of new employment premises/floorspace or the redevelopment, conversion, upgrading, intensification or reconfiguration of employment premises or floorspace on existing employment sites as identified in Policy EC2: Existing Strategic Employment Sites;
- e) The delivery of new economic development in rural areas in line with Policy EC4 Rural Economy; and
- f) The provision of new office floorspace (Use Class E(g)(i)) within Wealden's designated district, service and local centres as identified in Policy TC1: District, Service and Local Centre Hierarchy and 'Town Centre' First Principles.

Question 5

Do you agree with the updated draft Policy SS5: Provision of Employment Floorspace, and if not, why?

Policy SS6: Strategic Employment Allocations

1. To meet the employment and growth aspirations of the district, the following sites are allocated for business and employment purposes:

Site Reference	SHELAA Reference	Allocations	Employment floorspace (net)
EMP1	896/1510	Land at North Polegate A22	66,370 sqm
EMP2	1039/1310	Knights Farm West, Hailsham	40,000 sqm
EMP3	1115/1310	Woodside Park, Land East of A22, Hailsham	16,750 sqm
EMP4	1029/1310	Natewood Farm, Polegate Road, Hailsham	9,300 sqm

Large Employment Commitments	Employment Floorspace (net)
Land at Natewood Farm, Polegate Road, Hailsham	5,999 sqm
Land West of Uckfield, Uckfield	12,511 sqm
Mornings Mill Farm, Eastbourne Road, Lower Willingdon	8,600 sqm

2. The sites are allocated to provide employment uses E(g), B2 and B8. Retail uses and other Main Town Centre uses (excluding offices) will not be permitted at these sites. Once delivered these sites will be considered as strategic employment sites and will form part of the sites listed in Policy EC2 – Existing Strategic Employment Sites. Development must be in accordance with the site-specific requirements set out in the policies of this draft Local Plan.

Question 6

a) Do you agree with the updated draft Policy SS6: Strategic Employment Allocations, and if not, why?

b) Do you agree with the list of potential sites, the amount of development, and/or the issues identified in table 11 associated with draft Policy SS6 – Strategic Employment Allocations?

Chapter 04 Climate change

Why are we reconsulting on this Policy?

Policy CC8 (Sustainable Drainage) is included in this focused Regulation 18 Local Plan consultation as it is necessary to update the mapping and boundary in relation to the Pevensey Levels Hydrological Catchment Area. This now accurately reflects the area in which this policy is to be implemented and is consistent with neighbouring local planning authorities (notably Rother District Council (RDC)) and the Habitats Regulation Assessment. The update also provides an opportunity to respond to key feedback received during the previous public consultation on the Regulation 18 Draft Local Plan (March 2024).

The Lead Local Flood Authority (LLFA) and the Pevensey & Cuckmere Water Level Management Board (P&CWLMB) have recommended amendments to the policy to improve clarity and technical accuracy. These are reflected in this revised draft version of the Local Plan.

The policy now includes distinct sections on sustainable drainage, water quality and treatment, the protection of the Pevensey Levels SAC and Ramsar site and implementation and maintenance, with the final section providing clarity on the implementation and management of surface water schemes.

Additionally, reference to surface water entering foul drainage has been removed, as this is prohibited under the Water Act 1981. In addition, rainwater reuse has been added to the discharge hierarchy.

Policy CC8: Sustainable Drainage and Protection of the Pevensey Levels SAC and Ramsar Site

Sustainable Drainage Requirements

a) Development proposals which could affect drainage on or around the site must incorporate Sustainable Drainage Systems (SuDS) and, where relevant, demonstrate that surface water management will not adversely affect the integrity of the Pevensey Levels SAC and Ramsar site where the development proposal falls within the Pevensey Levels hydrological catchment.

b) All development proposals must:

- i) Integrate SuDS as a fundamental part of site design unless demonstrated to be inappropriate due to site-specific constraints (e.g. geology or groundwater levels).
- ii) Provide sufficient space within the site layout to accommodate SuDS features.
- iii) Ensure SuDS are multi-functional, contributing to flood risk reduction, water quality improvement, biodiversity enhancement, and green/blue infrastructure.
- iv) Deliver discharge rates agreed with the Lead Local Flood Authority (LLFA) and the Pevensey and Cuckmere Water Level Management Board (WLMB), where relevant, considering site-specific conditions.

v) Follow the discharge hierarchy:

Rainwater re-use (e.g. harvesting); then

Discharge into the ground; then

Discharge to a surface water body; and then

Discharge to a surface water sewer or other drainage system.

vi) Be designed and implemented in accordance with the latest local, regional and national guidance on SuDS, including early engagement with the LLFA. Infiltration-based drainage should be considered where viable, but it is recognised that infiltration may not be appropriate in some circumstances due to underlying geology and hydrology.

vii) Ensure that the site's drainage system includes a clearly defined and viable point of discharge, with appropriate connectivity to the wider drainage network. Proposals should demonstrate how surface water will be taken from the site to an agreed outfall location, in consultation with the LLFA.

viii) For phased developments, provide a strategic drainage approach across all phases.

Water Quality and Treatment

c) All development proposals located outside the Pevensey Levels hydrological catchment, and where no part of the site discharges to the Pevensey Levels hydrological catchment area must:

- i) Ensure surface water passes through a minimum of two treatment stages, referencing the Construction Industry Research and Information Association (CIRIA) SuDS Manual and pollution hazard indices; and
- ii) Reference the SuDS Manual and CIRIA guidance to support appropriate treatment design.

Pevensey Levels SAC and Ramsar Site Protection

- d) All development proposals within or adjacent to the Pevensey Levels hydrological catchment must engage with the Pevensey and Cuckmere WLMB and other relevant bodies at the earliest stage, and:
 - i) Provide sufficient detail of surface water drainage schemes at the outline stage if a Habitats Regulations Assessment (HRA) is triggered, specifically where hydrology is identified as a potential impact pathway;
 - ii) Demonstrate that drainage proposals will not result in adverse effects on the integrity of the SAC/Ramsar site;
 - iii) Incorporate SuDS that enhance water quality and ecological resilience;
 - iv) Ensure any SuDS scheme involves a minimum of three treatment stages and where necessary to avoid harm to the SAC/Ramsar site, include additional treatment stages; and
 - v) Avoid direct discharge of untreated surface water into the Pevensey Levels.
- e) The Council will support development that incorporates strategic-scale mitigation, including the use of off-site sustainable drainage systems designed to collectively address the impacts of multiple sites and deliver comprehensive flood and water quality management.

Implementation and Maintenance

- f) All development proposals must:
 - i) Submit a management and maintenance plan for SuDS over the lifetime of development, demonstrating permanent arrangements for repair and replacement; and
 - ii) Use the LLFA's SuDS Decision Support Tool for small-scale development, where applicable.
- g) All major development proposals must secure approval from the LLFA for the design and long-term maintenance of SuDS prior to commencement.

Question 7

Do you agree with the draft Policy CC8 Sustainable Drainage and Protection of the Pevensey Levels SAC and Ramsar Site, and if not Why?

Why are we consulting on the Policy and Spatial Designation?

Since the publication and consultation of the Regulation 18 Local Plan in March 2024, two significant developments have occurred, which provide new and clearer evidence regarding coastal erosion risk in the district:

1. The publication of the updated National Coastal Erosion Risk Mapping⁶⁵ (NCERM) dataset by the Environment Agency on 28 January 2025 provides the most up-to-date national picture of coastal erosion risk for England. This dataset incorporates over a decade of additional coastal monitoring data and reflects the latest shoreline management approaches. It also includes future scenarios accounting for climate change, such as sea level rise, based on UK Climate Projections (UKCP18). In Pevensey Bay, the updated mapping now clearly identifies that residential properties may be at risk if existing coastal defences are not maintained, representing a material change in the evidence base.
2. The establishment of the Pevensey Bay to Eastbourne Coastal Management Scheme (PevEb) has replaced the former Pevensey Coastal Defence Ltd (PCDL) arrangement. The PevEb scheme covers a broader area and reflects a more integrated and strategic approach to long-term coastal management, encompassing both Eastbourne and Pevensey Bay.

Therefore, the Council is now proposing a Policy for Coastal Change Management (CC9) and the associated spatial designation of a Coastal Change Management Area (CCMA) as part of this consultation stage. These proposals ensure the Local Plan reflects the most current and nationally recognised evidence on coastal erosion risk and acknowledges the risk of coastal erosion and flooding to residents, business and infrastructure within the Pevensey Bay area. The consultation provides an opportunity for stakeholders and the

public to comment on whether the designation and policy are appropriate, and whether the evidence justifies this approach. It also helps raise awareness of the potential implications of coastal change in the affected areas.

Policy CC9 Coastal Change Management Area (CCMA)

1. New permanent residential development, including proposals involving change of use, will not be supported within the Pevensy Bay CCMA (identified at Figure 13).
2. Any other forms of development including infrastructure provision within the CCMA will only be considered acceptable where a Coastal Change Vulnerability Assessment—proportionate to the scale and type of development—demonstrates that:
 - (a) it is necessary in that specific location;
 - (b) it will be safe over its planned lifetime;
 - (c) it will not have an unacceptable impact on coastal change, including the character of the coast and any relevant designations: and
 - (d) it delivers wider sustainability benefits.
3. Development permitted under the above criteria may be subject to temporary planning permission and restoration conditions to ensure compatibility with long-term coastal change.
4. Adaptation of existing buildings, infrastructure or land uses within the CCMA will be supported where it reduces vulnerability and/or increases resilience, subject to compliance with other policies.
5. Proposals must safeguard and, where possible, enhance the King Charles III England Coast Path and public access to the shoreline, in accordance with the Marine and Coastal Access Act 2009.
6. Proposals for coastal change measures, including the decommissioning, or relocation of existing development and infrastructure will be supported where it is demonstrated to be unsustainable and at risk of loss within the next 20 years (short term). Such proposals must:
 - (a) Align with the Shoreline Management Plan (SMP) and the National Flood and Coastal Erosion Risk Management Strategy for England;
 - (b) Include a clear plan for restoration of the site to a natural or semi-natural condition, including the removal of built structures, materials, and services; and
 - (c) Demonstrate how the relocation will be to a sustainable location outside the CCMA, and how the vacated site will contribute to coastal resilience, biodiversity, or marine conservation objectives, particularly in relation to the Beachy Head East Marine Conservation Zone (MCZ), which extends from the shoreline offshore.
7. Where development or land management activities are permitted within the Coastal Change Management Area (identified at Figure 13) under the criteria set out in Part 2 of

this policy, they must demonstrate no adverse impact on the Beachy Head East Marine Conservation Zone (MCZ), including:

- (a) avoiding increased sedimentation, pollution, or disturbance to intertidal and subtidal habitats;
- (b) supporting nature-based solutions such as saltmarsh restoration or shingle ridge enhancement; and
- (c) maintaining vegetated buffers and sustainable drainage systems to reduce runoff.

Question 8

- a) Do you support the designation of the CCMA at Pevensey Bay and do you have any comments on its boundary?
- b) Do you have any other comments on the wording of the draft policy?
- c) Should the Council consider this policy now and include it within the Wealden Local Plan, or consider it as part of a future review of the Local Plan when funding for future delivery phases for the Shoreline Management Plan may provide more certainty on the protection of the coast?
- d) Should an Article 4 Direction be applied to remove permitted development rights for residential and commercial properties within the CCMA? This would include extensions, outbuildings, hard surfacing, and other forms of development that could increase vulnerability or hinder managed retreat.
- e) Do you support the removal of the development boundary for Pevensey Bay to ensure that new windfall development is steered away from this location, which is at risk from coastal change?

Chapter 05 Housing

Why are we reconsulting on this Policy?

Policy HO8 (Affordable Housing) is included in this focused draft Regulation 18 Local Plan consultation as it has been necessary to update the affordable housing policy given the changes within the NPPF (2024) at paragraph 66. In addition, the requirement to deliver a minimum of 25% of affordable housing as 'First Homes', as set out in 'Affordable Homes' Written Ministerial Statement dated 24 May 2021 has been removed. This has

meant that the updated affordable housing policy is required to consider a new affordable housing tenure mix and, the Council has published its update to the Local Housing Needs Assessment (LHNA) (January 2026), which considers affordable housing need in this new national planning context. The update also provides the opportunity to respond to key feedback received during the previous public consultation on the Regulation 18 draft Local Plan (March 2024).

There was only a single comment from a statutory consultee on this policy from the National Health Service (NHS) who supported the policy in principle.

However, the development industry was clear that the proportion of First Homes expected as part of the Regulation 18 draft Local Plan (March 2024) would be a significant obstacle to delivery and that alternative options should be revisited. Others stated that the level of provision of First Homes will significantly reduce the level of provision of shared ownership, which impacts the ability of affordable housing providers to acquire and offer rented properties. This issue, alongside national planning policy changes have been reflected within the amended version of the policy removing the specific requirement for 'First Homes' and an increase in the proportion of other affordable routes to home ownership.

There were discordant views on the overall percentage of affordable housing to be provided by the affordable housing policy. The Council will keep this under review as it moves towards the Regulation 19 Local Plan, but this current tenure mix is supported by viability evidence at the level of 35%.

Policy HO8: Affordable Housing

Affordable housing requirement

1. To meet the district's need for affordable housing, all residential development proposals of 10 or more units (net), or proposals for 6 or more units (net) within the High Weald National Landscape, or sites of 0.5 hectares or more outside the High Weald National Landscape, will be required to provide on-site affordable housing. Affordable housing will be expected to be provided at a level of 35% of the total number of dwellings. The application of this policy relates to use class C3, including permanent residential caravan sites and C2 self-contained units. Financial contributions will be sought in lieu of on-site affordable housing on permanent residential caravan sites only.
2. Where a proposal comes forward with an affordable housing contribution higher than that required under criterion 1 above, the Council will consider this on a case-by-case basis and will only seek to support schemes that deliver mixed and balanced communities, as well as provide sufficient infrastructure contributions and/or on-site infrastructure necessary to make the development acceptable in planning terms.
3. If a development site is sub-divided to create two or more separate development schemes, one or more of which falls below the relevant affordable housing threshold, the Council will require an appropriate level of affordable housing to reflect the provision that would have been achieved on site as a whole, had it come forward as a single scheme.

Tenure

4. Affordable housing provision should incorporate a mix of tenures. The Council will expect a tenure mix of 55% social rent, 25% affordable rent and 20% through other affordable routes to home ownership, including shared ownership, First Homes, Rent to Buy and other types of intermediate accommodation. In the case where First Homes are provided, at least a discount of 30% will be expected to ensure that the actual housing cost is genuinely affordable for first time buyers within Wealden.

Exceptional circumstances

5. There may be exceptional circumstances where the provision of on-site affordable housing is not viable or desirable. The Council considers that the following issues may represent exceptional circumstances, where the applicant is unable to comply with this policy:
 - a. The developer has provided written evidence that no Council Approved Registered Provider will take the units, and this has been demonstrated to the satisfaction of the Council that this is the case; or
 - b. It is demonstrated that there is no realistic prospect of providing affordable housing by another means, such as the District Council; or
 - c. It can be demonstrated that the provision of the policy-compliant level of affordable housing would make the development unviable.
6. Where it can be proven that the affordable housing requirement cannot be achieved, due to economic viability, there will be flexibility in meeting stated targets. It will be the responsibility of the applicant to demonstrate that the requirements of the policy cannot be met, and that the closest alternative provision that can be achieved is provided taking into account viability and need in agreement with the Local Planning Authority. The alternative provision should initially consider a change in tenure mix before considering reducing the overall totality of provision on site. If provision is not shown to be viable, then serviced plots for affordable housing could be provided, should this be acceptable to the Council. If this is not viable or considered appropriate by the Council, a commuted sum in lieu of on-site delivery will be required. This will be subject to independent assessment by the Council's appointed consultant, of which, the costs will be paid for by the applicant.

Affordable Housing Design

7. The design of all new affordable dwellings should be such that the quality and appearance of the homes (including the site layout) are indistinguishable from market housing. Any new housing scheme should make use of good quality materials and be designed in such a way as to reduce ongoing management, maintenance and repair costs. Such proposals should be designed to ensure that service charges for any affordable housing are kept relatively low. Affordable housing should be provided in small clusters throughout the development scheme to ensure the creation of mixed and balanced communities.

Community Land Trusts, Co-Housing and Almhouses

8. The Council supports CLTs, Co-Housing and Almhouse schemes that provide affordable housing subject to other policies within this Local Plan.

Question 9

Do you agree with the updated draft Policy HO8: Affordable Housing, and if not, why?

Why are we reconsulting on this Policy?

Since the publication and consultation on the Regulation 18 Local Plan in March 2024, there have been updates to national policy in planning for GTTSP and we have also undertaken further collaborative working with our neighbouring local planning authorities. These changes can be summarised as follows:

1. The updated Planning Policy for Traveller Sites (PPTS) document (December 2024) made significant changes to the definition of gypsies, travellers and travelling showpeople in Annex 1 of the PPTS, following domestic and European Court judgements. The definition was broadened to ensure it included '*all other persons with a cultural tradition of nomadism or of living in a caravan*' rather than solely persons of a nomadic habit of life, whether they have ceased to travel, permanently or temporarily, or not. As a result, the policy wording and content of supporting text must be reviewed and updated in all applicable policies in this focused draft Regulation 18 Local Plan (i.e. Policies SS3: Gypsy, Traveller and Travelling Showpeople – Accommodation Needs and HO9: Gypsy, Traveller and Travelling Showpeople – Site Criteria).

2. In terms collaborative working, the Duty to Cooperate Gypsy and Traveller Accommodation Needs group, which includes all local planning authorities in East Sussex has been held regularly since Autumn 2024, to work collaboratively to ensure appropriate coordination and planning for the cross-boundary strategic planning issues such as the provision of Gypsy, Traveller and Travelling Showpeople sites. As part of this, a joint 'Call for Sites' was undertaken in Autumn 2025. The publication and assessment of these sites form part of the evidence base associated with this focused draft Regulation 18 Local Plan, the outcomes of which required an update to Policy SS3 (Gypsy, Traveller and Travelling Showpeople – Accommodation Needs), in how these needs may be met on individual sites.

These proposed amendments to the Local Plan reflect the most current evidence on planning for the needs of GTTSP, both in terms of policy requirements and suitable sites. The consultation provides an opportunity for stakeholders and the public to comment on whether the policies and sites are appropriate, and whether the evidence justifies this change in approach.

There were limited responses to draft Wealden Local Plan (March 2024) in relation to Policy HO9 (Gypsy, Traveller and Travelling Showpeople – Site Criteria). However, there were several statutory consultees who have provided comments on the policy that either provided direct support for the policy or have suggested minor changes to the policy wording (most notably Natural England and Rother District Council) to improve the clarity of the policy. These have largely been taken on board, and we have updated this policy to reflect those comments, where agreed.

Policy HO9: Gypsy, Traveller and Travelling Showpeople - Site Criteria

The following criteria will be taken into account when determining planning applications for new or extended permanent sites and transit sites for Gypsies, Travellers and Travelling Showpeople:

- a) That the site or extension satisfies a clearly defined need, as evidenced by the GTAA for Wealden District and the occupiers of the site meet the definition as set out in the Planning Policy for Traveller Sites (PPTS) (2024), or any subsequent update;
- b) That the site is well related to an existing sustainable settlement (as defined within the settlement hierarchy) with local services and facilities, particularly shops, public transport provision, primary health care and schools;
- c) That new sites or the extension of existing sites in rural areas are of a scale appropriate to their surroundings and would not individually or cumulatively dominate the nearest settled community, or cause undue impact upon local infrastructure or services in the area;
- d) That the site avoids locations where there is a risk of flooding of all types, given the vulnerability of residential caravans. Where a site is identified as being at risk from surface water flooding, a site-specific flood risk assessment must be undertaken in line with Policy CC7: Managing Flood Risk;
- e) That the proposal has a safe vehicular and pedestrian access to the surrounding principal highway network, and that the site will be large enough to enable vehicle movements within the site, including parking and circulation to take place, having regard to the total number of pitches/plots provided on site;
- f) That any new site or extension provides for proper consideration of the effect of local environmental quality (such as through noise pollution or odour impact) on the health and well-being of any Gypsy, Traveller or Travelling Showpeople located close to such uses that may impact the occupiers of the site;
- g) That the site has existing or can be provided with power, drinking water, suitable sewage treatment and waste disposal facilities;
- h) In cases where proposals are in or adjacent to the High Weald National Landscape, or where the proposal is within the setting of the South Downs National Park, the scale and the extent of development should be limited, sensitively located and designed to avoid or fully mitigate adverse impacts on these designated landscapes;
- i) The proposal must be well-screened by existing or new native vegetation that contains the site visually. The screening should be maintained permanently, and any planning application should be accompanied by a landscape management plan to ensure it remains in perpetuity. The use of high fences or walls to supplement the existing screening of the site will not be supported;
- j) That the proposal is well designed and laid out, ensuring that suitable amenity space is provided in terms of open space and soft landscaping. For permanent sites, all pitches/plots should incorporate an amenity block/day room; hardstanding space for storage/drying; garden/amenity area; minimum firebreaks between site boundaries, and

static/touring standings, whilst limiting the use of hard standing and further permanent structures. Each pitch/plot should at least be able to accommodate 1 mobile home, 1 touring caravan and 2 car parking spaces. Where proposals for amenity blocks/day rooms are provided, these must be of appropriate scale to the pitch/plot, well-designed and collocated where possible; and

k) Any proposal for a new or extended site for Travelling Showpeople plots will need to demonstrate sufficient space for the storage and maintenance of equipment/or the exercising of animals commensurate with any business needs of the site. In addition, suitable bays for lorries/trailers should be provided.

Question 10

Do you agree with the updated draft Policy HO9: Gypsy, Traveller and Travelling Showpeople - Site Criteria, and if not why?

Chapter 06 Site Allocations

Policy SA1: Housing and Mixed Use Site Allocations

The Council has identified 'Housing and Mixed-Use Site Allocations' within the Wealden Local Plan and these are identified on the Council's Policies Map with the references identified below (for employment sites, see Policy SS6 – Strategic Employment Allocations). All housing and mixed-use site allocations must be delivered in accordance with the development plan when read as a whole. The following sites shown in table 13 are allocated within the draft Local Plan.

The allocations can be found in Table 13 on pages 152 -158 of the local plan

Question 11

- a) Do you agree with the updated draft Policy SA1: Housing and Mixed-Use Site Allocations, and if not, why?
- b) Do you agree with the site allocations listed within this policy and if not, what are the reasons for this?

Buried at the back of the local plan at page 228 are these “questions”:

Question 12

Draft Site Allocations - Please provide the site reference and site name that you wish to comment on. You can comment on as many sites as you wish to. If you would like to comment on a SHELAA site or parish, please provide the SHELAA reference and site or parish name?

Question 13

Please use this box to make any general comments that you may have that are not covered by any other question within the draft 'Focused' Wealden Local Plan?

Question 14

Please use this box to make any comments on any supporting documents. For example, this may include the Interim Sustainability Appraisal, Interim Infrastructure Delivery Plan, and Interim Equalities and Fairness Impact Assessment?

Question 15

- a) Please use this box to upload any documents to support your previous answers, you may upload as many document as you need to.
- b) Please use this box to add any comments that you may want to make about the documents that have been uploaded.

Appendix B

This appendix includes a table below showing the proposed housing numbers for each parish broken down into:

- Commitments at 1 April 2025
- Windfall allowance in the Reg.18(2) Local Plan
- Allocated dwellings in the Reg.18(1) Local Plan
- Total number of dwellings
- Changes to the number of dwellings since the 2024 Reg.18(1) Plan

Parish	Committed Dwellings (Net) as of 1 April 2025	Windfall Allowance	'Focused' Local Plan Allocated Dwellings (Net)	Total	Changes to Allocations since Reg 18(1) (March 2024)
Arlington	18	12	0	30	n/a
Berwick	5	4	72	81	15 additional dwellings on 2 new sites, plus 20 additional dwellings on previously identified sites.
Buxted	175	49	125	349	15 additional dwellings on a previously identified site
Chalvington with Ripe	34	12	0	46	n/a
Chiddingly	30	13	0	43	n/a
Crowborough	418	275	165	858	18 additional dwellings on 2 new sites
Danehill	12	23	0	35	n/a
East Dean and Friston	3	0	0	3	n/a
East Hoathly with Halland	251	19	380	650	n/a
Fletching	12	14	0	26	n/a
Forest Row	55	61	0	116	n/a
Framfield	288	26	264	578	225 additional dwellings across 2 new sites
Frant	14	21	682	717	175 additional dwellings across 3 new sites, plus 30 additional on sites previously identified
Hadlow Down	7	10	0	17	n/a

Parish	Committed Dwellings (Net) as of 1 April 2025	Windfall Allowance	'Focused' Local Plan Allocated Dwellings (Net)	Total	Changes to Allocations since Reg 18(1) (March 2024)
Hailsham	1,653	291	696	2,640	49 additional dwellings across 2 new sites
Hartfield	10	28	11	49	n/a
Heathfield and Waldron	55	155	176	386	25 additional dwellings across 3 new sites
Hellingly	923	52	199	1,174	174 additional dwellings across 3 new sites
Herstmonceux	145	35	9	189	n/a
Hooe	1	6	0	7	n/a
Horam	194	40	807	1,041	5 additional dwellings on site previously identified
Isfield	5	9	20	34	n/a
Laughton	15	8	0	23	n/a
Little Horsted	0	3	1,500	1,503	1,500 additional dwellings on 1 new site
Long Man	2	6	0	8	n/a
Maresfield	56	46	245	347	10 additional dwellings on 1 new site
Mayfield and Five Ashes	19	51	0	70	n/a
Ninfield	95	20	20	135	n/a
Pevensy	4	42	5	51	5 additional dwellings on 1 new site
Polegate	579	119	131	829	n/a
Rotherfield	31	42	5	78	n/a
Selmeston	0	2	0	2	n/a

Parish	Committed Dwellings (Net) as of 1 April 2025	Windfall Allowance	'Focused' Local Plan Allocated Dwellings (Net)	Total	Changes to Allocations since Reg 18(1) (March 2024)
Uckfield	1,232	191	496	1,919	n/a
Wadhurst	32	62	20	114	n/a
Warbleton	2	17	0	19	n/a
Wartling	1	6	0	7	n/a
Westham	616	99	660	1,375	50 additional dwellings across 2 new sites, plus 261 additional on sites previously identified
Willingdon and Jevington	841	96	40	977	40 additional dwellings on 1 new site
Withyham	12	35	36	83	n/a
Total	7,845	2,000	6,764	16,609	

Source: Table 5, pages 71 – 73 Draft Local Plan February 2026

Summarising the above information:

24 Town/Parishes in Wealden's LPA area have been assessed as suitable to receive a share of the total 6,764 house allocations.

14 Town/Parishes in Wealden's LPA area have been assessed as unsuitable for allocations although they have been assessed as suitable for a share of the 2,000 windfalls

Three Parishes have not been allocated any housing as they are within the South Downs National Park planning area.

Appendix C

The table below shows every site selected for an allocation in the February 2026 Reg.18(2) draft plan.

Some entries are in bold text, or are struck through, or contain an asterisk or have a green background. This signifies:

Bold text – new or revised allocations since the March 2024 Local Plan. Where one number is in brackets in the Housing Number column, this represents the number from the Reg.18(1) plan

***** - site previously an allocation in the Reg.18(1) plan but now has an increased number of houses. The Reg.18(1) number is in brackets.

~~Strike through~~ - an allocation in the 2024 plan but is now a commitment with planning permission having been granted.

Green background – a strategic allocation (i.e. >50 houses) with a specific site allocation policy. The site specific individual allocation policies for the 29 sites with the green background above are at pages 159 – 197 in the Reg.18(2) Wealden Draft Local Plan.

Policy Ref.	Site	SHELAA Ref.	Parish	Adjoining Settlement	Housing Number
BE1*	Land north of Recreation Ground, Station Road, Berwick Station	617/1780	Berwick	Berwick Station	30 (10)*
BE2	Land West of Station Road, Berwick Station	619/1780	Berwick	Berwick Station	27
BE3	Land to north east of Berwick Station, Station Road, Berwick Station	822/1780	Berwick	Berwick Station	10
BE4	Land at Brookfield Nursey, Station Road, Berwick Station	616/1780	Berwick	Berwick Station	5
BU1	Land east of Coopers Green Road, Ringles Cross	001/3225	Buxted	Ringles Cross	20
BU2	Land behind the Croft, Coopers Green Road, Ringles Cross	291/3225	Buxted	Ringles Cross	15
BU3	Land opposite Roundwood, Coopers Green Road, Ringles Cross	975/3225	Buxted	Ringles Cross	20
BU4	Lower Totease Farm, Framfield Road, Buxted	027/1840	Buxted	Buxted	10
BU5	Land at The Walled Garden, Five Ash Down	058/1990	Buxted	Five Ash Down	20
BU6	Land east of Great Totease Farm, Church Road, Buxted	146/1840	Buxted	Buxted	20
BU7*	Land at Holly Farm, Station Road, Buxted	744/1840	Buxted	Buxted	35 (20)*
BU8	Land at Mockbeggar Farm, London Road, Uckfield	1005/1410	Buxted	Ringles Cross	60
CR1	Kingswood, Luxford Lane, Crowborough	038/1110	Crowborough	Crowborough	6
CR2	Land adjacent to the London Road and Pilmer Road Junction, Crowborough	055/1110 317/1110 634/1110	Crowborough	Crowborough	28
CR3	Land at Steel Cross Farm, Green Lane, Crowborough	250/1110	Crowborough	Crowborough	60
CR4	Land at Byeways, Palesgate Lane, Crowborough	698/1110	Crowborough	Crowborough	30
CR5	Land at Millbrook Road, Crowborough	507/1110	Crowborough	Crowborough	15
CR6	Land east of Southview Close, Crowborough	1067/1110	Crowborough	Crowborough	8
CR7	Spring Cottage, Eridge Road, Crowborough	298/1110	Crowborough	Crowborough	10

Policy Ref.	Site	SHELAA Ref.	Parish	Adjoining Settlement	Housing Number
CR8	Crowborough Police Station, Crowborough Hill, Crowborough	955/1110	Crowborough	Crowborough	8
EH1	Land off South Street, East Hoathly	154/1950	East Hoathly with Halland	East Hoathly	20
EH2	Land Hesmonds Stud, East Hoathly	773/1950	East Hoathly with Halland	East Hoathly	170
EH3	Broomy Lodge Field, London Road, East Hoathly	466/1950	East Hoathly with Halland	East Hoathly	30
EH4	Land east of South Street, East Hoathly	782/1950	East Hoathly with Halland	East Hoathly	30
EH5	Harrison's, South of London Road, East Hoathly	985/1950	East Hoathly with Halland	East Hoathly	150
FF1	Cysleys Farm, Eastbourne Road, Uckfield	028/1410	Framfield	Uckfield	145
FF2	Land off Old Eastbourne Road, Uckfield	194/1410	Framfield	Uckfield	30
FF3	Blackboys Inn and Adjoining Land, Lewes Road, Blackboys	251/1790	Framfield	Blackboys	9
FF4	Land adjoining Old Mill House, Framfield Road, Blackboys	1237/1790	Framfield	Blackboys	10
FF5	Land at Bird In Eye (North), Bird In Eye Hill, Uckfield	127/1410	Framfield	Uckfield	215
FR1	Land at Benhall Mill Road, Tunbridge Wells	063/1610	Frant	Tunbridge Wells	60
FR2	Land off Bayham Road (Site A), Tunbridge Wells	755/1610	Frant	Tunbridge Wells	100
FR3*	Land at Bayham Road, Tunbridge Wells	651/1610	Frant	Tunbridge Wells	60 (30)*
FR4	Land between Court Lodge and Bells Yew Green Industrial Estate, B2169, Bells Yew Green	748/1750	Frant	Bells Yew Green	20
FR5	Land at Whinlatter, St Mark's Road, Tunbridge Wells	818/1610	Frant	Tunbridge Wells	7
FR6	Pinewood Farm, Frant Road, Tunbridge Wells	979/1610	Frant	Tunbridge Wells	170
FR7	Land to the west of Frant Road, Tunbridge Wells	1077/1610	Frant	Tunbridge Wells	90
FR8	Land to the east of Benhall Mill Road, Tunbridge Wells	126/1610	Frant	Tunbridge Wells	120

Policy Ref.	Site	SHELAA Ref.	Parish	Adjoining Settlement	Housing Number
FR9	Land at Tunbridge Wells Rugby Club and Chase Farm, Frant Road, Tunbridge Wells	1201/1610	Frant	Tunbridge Wells	50
FR10	The Glebe Land, Church Lane, Frant	581/2030	Frant	Frant	5
HA1	Land east of Battle Road, Harebeating Lane, Hailsham	197/1310	Hailsham	Hailsham	300
HA2	Land south of A271 and north of Harebeating Lane, Hailsham	135/1310	Hailsham	Hailsham	180
HA3	Land to the east of Battle Road, Hailsham	521/1310 313/1310	Hailsham	Hailsham	100
HA4	Land at Harebeating Nursery, Harebeating Lane, Hailsham	524/1310	Hailsham	Hailsham	10
HA5	Hamlins Mill, Mill Road, Hailsham	294/1310	Hailsham	Hailsham	6
HA6	Bolneys Farm, South Road, Hailsham	305/1310	Hailsham	Hailsham	60
HA7	150 and 152 Battle Road, Hailsham	328/1310	Hailsham	Hailsham	5
HA8	Grovelands Primary School, Gleneagles Drive, Hailsham	384/1310	Hailsham	Hailsham	40
HA9	Land south of Howard Close, Hailsham	454/1310	Hailsham	Hailsham	40
HA10	Amberstone Council Depot, Amberstone, Hailsham	461/1310	Hailsham	Hailsham	15
HA11	Fire Station, Victoria Road, Hailsham	470/1310	Hailsham	Hailsham	10
HA12	Land at Hailsham Delivery Office, 11 North Street, Hailsham	621/1310	Hailsham	Hailsham	8
HA13	Land at the Market, Market Street, Hailsham	678/1310	Hailsham	Hailsham	40
HA14	Harebeating Farm, Harebeating Lane, Hailsham	883/1310	Hailsham	Hailsham	20
HA15	Land at the Paddocks, South Road, Hailsham	1048/1310	Hailsham	Hailsham	8
HA17	Wellfield, 154 - 156 Station Road, Hailsham	091/1310	Hailsham	Hailsham	9
HA18	Land at Oaklands, west of Coldthorn Lane, Ersham Road, Hailsham	1129/1310	Hailsham	Hailsham	40
HAR1	Land at Castle Farm, Withyham Road	708/2080	Hartfield	Hartfield	5

Policy Ref.	Site	SHELAA Ref.	Parish	Adjoining Settlement	Housing Number
HAR2	Land at Old Crown Farm, Edenbridge Road, Hartfield	709/2080	Hartfield	Hartfield	6
HEA1	Land to the east of Burnetts Farm, Firgrove Road, Cross-in-Hand	017/1920	Heathfield and Waldron	Cross-in-Hand	10
HEA2	Land to the south west of Ghyll Road, Tilsmore, Heathfield	149/1210	Heathfield and Waldron	Heathfield	35
HEA3	Land south of Burwash Road and east of Tower Street, Heathfield	260/1210	Heathfield and Waldron	Heathfield	20
HEA4	Land at 15 Tower Street, Heathfield	299/1210	Heathfield and Waldron	Heathfield	10
HEA5	Land at and surrounding Rothershaw, High Street, Heathfield	525/1210 595/1210	Heathfield and Waldron	Heathfield	22
HEA6	Land to rear of Breton House, B2102, Cross in Hand	431/1920	Heathfield and Waldron	Cross-in-Hand	15
HEA7	Land at Heathfield Police Station, High Street, Heathfield	633/1210	Heathfield and Waldron	Heathfield	6
HEA8	Land at Snatchells Farm, A265, Heathfield	750/1210	Heathfield and Waldron	Heathfield	24
HEA9	Land at Sunnyside, A267, Cross in Hand	941/1920	Heathfield and Waldron	Cross-in-Hand	9
HEA10	Parklands, Burwash Road, Heathfield	275/1210	Heathfield and Waldron	Heathfield	10
HEA11	The Old Half Moon, Burwash Road, Heathfield	798/1210	Heathfield and Waldron	Heathfield	10
HEA12	5 Farthing Cottage, Back Lane, Cross in Hand	1238/1210	Heathfield and Waldron	Cross-in-Hand	5
HEL1	Land adjoining 13 Station Road, Hellingly	107/3000	Hellingly	Hellingly	10
HEL2	Land at Park Farm, New Road, Hellingly	919/3000	Hellingly	Hellingly	360
HEL3	Woods Corner, North Street, Lower Horsebridge	1145/3100	Hellingly	Lower Horsebridge	15
HEL5	Field at North Street, Lower Horsebridge	009/3100	Hellingly	Lower Horsebridge	14
HEL6	Land at Horselunges Manor, Hellingly	1233/3000	Hellingly	Lower Horsebridge	60
HEL7	Land at Park Farm, New Road, Hellingly	1241/3000	Hellingly	Hailsham	100
HMX1	Land at Collins Honda, Hailsham Road, Herstmonceux	608/2090	Herstmonceux	Herstmonceux	9

Policy Ref.	Site	SHELAA Ref.	Parish	Adjoining Settlement	Housing Number
HOR1*	Land adjoining Discovery Way and Village Hall, Horam	1062/3030	Horam	Horam	10 (5)*
HOR2	Land at Cauldron, Horebeech Lane, Marle Green, Horam	830/3030	Horam	Horam	45
HOR3	Land at Great Easterfields, Chiddingly Road, Horam	920/3030	Horam	Horam	6
HOR4	Clearview Farm, Chiddingly Road, Horam	960/3030	Horam	Horam	35
HOR5	Horeham Flat Farm, Chiddingly Road, Horam	1057/3030	Horam	Horam	6
HOR6	Coxlow Farm, Horam Road, Horam	875/3030	Horam	Horam	750
IS1	Holly Gap Farm, Station Road, Isfield	413/3040	Isfield	Isfield	10
IS2	Land to rear of Sandpit Cottage, Station Road, Isfield	1143/3040	Isfield	Isfield	10
LH1	Land at Owlsbury Farm, Lewes Road, Uckfield	1061/1410	Little Horsted	Uckfield	1500
MA1	Land south of Maresfield, A22, Maresfield	212/3120 440/3120	Maresfield	Maresfield	210
MA2	Land south west of Park Farm, A22, Maresfield	421/3120	Maresfield	Maresfield	25
MA3	Land east of Top Drive, Maresfield Park, Maresfield	1000/3120	Maresfield	Maresfield	10
NIN1	Land adjacent to Ninfield Reservoir, High Street, Ninfield	098/3170	Ninfield	Ninfield	20
PE1	The Old Mint House, High Street, Pevensey	1100/3200	Pevensey	Pevensey	5
POL1	Paddock to front of Dittons Park Industrial Estate, Dittons Road, Polegate	048/1510	Polegate	Polegate	24
POL2	Hindsland Fields (east), Eastbourne Road, Polegate	120/1510	Polegate	Polegate	30
POL3	Land at Shepham Lane, Polegate	241/1510	Polegate	Polegate	240
POL4	Hindsland Fields (west), Eastbourne Road, Polegate	261/1510	Polegate	Polegate	60
POL5	Former Waterhouse Coaches Site, Dittons Road, Polegate	518/1510	Polegate	Polegate	8
POL6	Land at Royal Mail Delivery Office, 74 High Street, Polegate	622/1510	Polegate	Polegate	8
POL7	Polegate Station Car Park, High Street, Polegate	967/1510 1068/1510	Polegate	Polegate	25

Policy Ref.	Site	SHELAA Ref.	Parish	Adjoining Settlement	Housing Number
RO1	Hideaway, Tubwell Lane, Crowborough	1018/1110	Rotherfield	Crowborough	5
UCK1	Land at Thorncrest, Lewes Road, Uckfield	006/1410	Uckfield	Uckfield	30
UCK2	Land at Horstedpond Farm, Lewes Road, Uckfield	205/1410	Uckfield	Uckfield	350
UCK3	Charlwood Manor, Snatts Road, Uckfield	157/1410	Uckfield	Uckfield	17
UCK4	Sunview, 46 New Road, Ridgewood, Uckfield	198/1410	Uckfield	Uckfield	30
UCK5	Land at Springfield, Lewes Road, Ridgewood, Uckfield	323/1410	Uckfield	Uckfield	15
UCK6	Land South West Of Ridgedown, Lewes Road, Uckfield	1144/1410	Uckfield	Uckfield	55
UCK7	Cress Farm, 20 Lewes Road, Ridgewood, Uckfield	539/1410	Uckfield	Uckfield	8
UCK8	Land South of Victoria Park, Ridgewood, Uckfield	346/1410	Uckfield	Uckfield	100
UCK9	Land rear of Oakley Court, Selby Road, Uckfield	517/1410	Uckfield	Uckfield	6
UCK10	Uckfield Police Station, New Town, High Street, Uckfield	956/1410	Uckfield	Uckfield	10
UCK11	Land at White House Farm, London Road, Uckfield	1007/1410	Uckfield	Uckfield	240
WAD1	Land at Windmill House, Windmill Lane, Wadhurst	694/3330	Wadhurst	Wadhurst	20
WES1	Land adjacent to 125 Rattle Road, Westham	473/3360	Westham	Westham	7
WES2	Dittons Nursery, Dittons Road, Stone Cross	529/3280	Westham	Stone Cross	20
WES3	Land at Hazlebank, Rattle Road, Stone Cross	575/3280	Westham	Stone Cross	8
WES4	Land to the west of the B2104, Hankham	944/3280	Westham	Stone Cross	15
WES5*	Sharnfold Farm, Hailsham Road, Stone Cross	745/2070 786/2070 1132/2070	Westham	Stone Cross	350 (89)*
WES6	Land at and adjacent to The Downs View and Emberson, Hailsham Road, Stone Cross	1153/3280	Westham	Stone Cross	60
WES7	Land at Peelings Lane, Westham	1099/3360 732/3360	Westham	Westham	150

Policy Ref.	Site	SHELAA Ref.	Parish	Adjoining Settlement	Housing Number
WES8	Land to the west of Stone Cross Garden Centre, Dittons Road, Stone Cross	677/3280	Westham	Stone Cross	20
WES9	Land south of Hankham Road, Stone Cross	1025/3280	Westham	Stone Cross	30
WIL1	Land at Mornings Mill Farm	1234/3370	Willingdon and Jevington	Willingdon	40
WIT1	Land south of Back Lane and to the west of railway line, Groombridge	213/2040	Withyham	Groombridge	21
WIT2	Land to the rear of Cooks Corner Farm and to the north of London Road, Crowborough	576/1110	Withyham	Crowborough	15

Source: Table 13, pages 152 – 158 Wealden Draft Local Plan February 2026

Appendix D

The 27 sites in the table below (totalling 8,329 houses, of which 5,854 could be delivered by 2042) are not currently considered suitable for an allocation owing to the issues set out in the right hand column of the table.

However, these sites are being considered further in order that Wealden can meet its housing “need”. Further work is being undertaken on the assessment of these sites and Wealden is seeking comments on both technical matters and outstanding issues in order to inform the Reg.19 plan.

It is anticipated that the promoters of these 27 sites will be responding to this current consultation providing reasons whereby Wealden should include these sites as allocations in the Reg.19 plan.

Comments on any of these 27 sites should be submitted under question 12, quoting both the option reference number and the SHELAA reference number.

Seven of the sites in Appendix D are currently assessed in the 2026 SHELAA as not deliverable or developable with the reasons set out therein. However, as they have thus “failed” the SHELAA assessment, they have not been taken forward to the sustainability appraisal. This means that the information provided on these sites is less than would be the case had they been sustainability appraised. Therefore it is important that as well as attempting to discredit the positive attributes of a site for development, that the reasons whereby the site is currently not considered suitable for development are reinforced if possible. Otherwise, with Wealden looking to increase the number of sites suitable for development in order to get closer to the overall housing “need” figure, the constraints rendering the site as unsuitable may be down-played in order to show a greater number of them as suitable.

These seven sites are:

289/1410 Land by Croft House, Uckfield

297/1410 Land adjacent to Croft house, Uckfield

1222/2020 Land north of Eastbourne Road

725/1410 Land at Hempstead Lane, Uckfield

443/1610 Strawberry Hill Farm, Eridge Road, Tunbridge Wells

1259/1310 Mushroom Farm, Saltmarsh Lane, Hailsham

1079/3100 Land at Broad Farm, Lower Horsebridge

Without any information in the Sustainability Appraisal for these sites, the reasons in the SHELAA should be the starting for a critique.

Option Reference number	SHELAA Reference	Site	Parish/ Settlement (if differs)	Potential Yield (Dwellings)	Further issues for assessment
OARL1	825/1310 805/1310	Land to the north west of Hempstead Lane, Hailsham	Arlington/ Hailsham	2,000 (1,600 expected during the Plan Period)	<ul style="list-style-type: none"> - Access and connectivity issues due to severance from Hailsham by A22 – details lacking from site promoter on vehicular and pedestrian access connectivity, including across the A22 into Hailsham; - Transport impact on A22/Boship roundabout, remain to be addressed (through transport modelling/potential mitigation); - Landscape impact – intervisibility with South Downs National Park; - Issues of flood risk and connection across site, and viability of options to deliver those; - Issues of sewerage capacity and infrastructure/connectivity; and - Mix of uses and infrastructure on site.
OBE1	331/1780	Land east of Station Road, Berwick Station	Berwick	5	<ul style="list-style-type: none"> - Provision of suitable and safe vehicular access, with access needed through neighbouring site; and - Potential odour nuisance from Wastewater Treatment Works (WwTW) to be addressed.
OBU1	234/1840	Land at Taylors Shaw, Framfield Road, Buxted	Buxted	20	<ul style="list-style-type: none"> - Pedestrian and vehicular access would need securing – with options dependent on third party land; - More detail on landscape measures required; and

Option Reference number	SHELAA Reference	Site	Parish/ Settlement (if differs)	Potential Yield (Dwellings)	Further issues for assessment
					<ul style="list-style-type: none"> Issue of site severance due to pond/ location in centre of site.
OBU2	1247/1840	Land at Limes Lane, Buxted	Buxted	25	<ul style="list-style-type: none"> Pedestrian and vehicular access would need securing – needs further detail of width of site ownership at northern access point; Alternative access may require offsite junction/highway improvements, and no details yet submitted; and Need to consider layout/ biodiversity/ character issues.
OCR1	200/1110	Land north of Stone Cross Road at Alderbrook, Crowborough	Crowborough	80	<ul style="list-style-type: none"> Details of access unknown and may require access through/over third-party land.
OCR2	1026/1110	Land at Beechenwood Farm, Crowborough	Crowborough	120	<ul style="list-style-type: none"> Further details required of proposal and landscape/character impact, including potential mitigation.
OEH1	1235/1950	Land at Laughton Park Farm	East Hoathly with Halland/ East Hoathly, Halland and Laughton	4,000 (925 during the Plan Period)	<ul style="list-style-type: none"> Significant site forming new settlement – details of infrastructure, access, connectivity, transport and other impacts all needed to consider further; Detail of deliverability/phasing/ infrastructure all required; Landscape impacts – extent of development would result in significant change to landscape; Vehicular access points – need careful consideration as to highway capacity impacts;

Option Reference number	SHELAA Reference	Site	Parish/ Settlement (if differs)	Potential Yield (Dwellings)	Further issues for assessment
					<ul style="list-style-type: none"> - Impact on setting of several heritage assets; and - Lack of sustainable transport options presented at this stage by the site promoter.
OFF1	400/1410	Land at High Cross Farm, Eastbourne Road, Uckfield	Framfield/ Uckfield	90	<ul style="list-style-type: none"> - Multiple issues make site unsuitable in entirety, e.g. flood risk/character/location/ access issues prevent development of entirety of site. Option to just develop to north, fronting Eastbourne Road, if viable in conjunction with neighbouring land; - Masterplan required to resolve access/ connectivity issues; - Significant access issues – vehicular and pedestrian access between north and south requires bridge across stream (restricted by Ancient Woodland), speed of road hinders access; - Parts of site located too far from Uckfield to be sustainable/ accessible by non-car modes of transport; - Landscape sensitive features on site - High visual prominence in the wider landscape and mitigation is unknown; and - Ancient Woodland in north and Ridgewood Stream in centre of the site are constraints to overcome.
OFF2	289/1410	Land by Croft House, Eastbourne Road, Uckfield	Framfield/ Uckfield	100	<ul style="list-style-type: none"> - High visual prominence in the wider landscape and mitigation is unknown;

Option Reference number	SHELAA Reference	Site	Parish/ Settlement (if differs)	Potential Yield (Dwellings)	Further issues for assessment
					<ul style="list-style-type: none"> - Uncertain whether existing footpath can be extended along Eastbourne Road; - Alternative pedestrian access relies on third party land; and - Option to develop in conjunction with neighbouring land – masterplan required to resolve access/connectivity issues.
OFF3	297/1410	Land adjacent to Croft House, Eastbourne Road, Uckfield	Framfield/ Uckfield	60	<ul style="list-style-type: none"> - High visual prominence in the wider landscape and mitigation is unknown; - Uncertain whether existing footpath can be extended along Eastbourne Road; - Alternative pedestrian access relies on third party land; and - Option to develop in conjunction with neighbouring land – masterplan required to resolve access/connectivity issues.
OFF4	1222/2020	Land north of Eastbourne Road	Framfield/ Uckfield	60	<ul style="list-style-type: none"> - No existing vehicular access; and - Alternative vehicular access relies on third party land.
OFF5	725/1410	Land at Hempstead Lane, Uckfield	Framfield/ Uckfield	300	<ul style="list-style-type: none"> - No pedestrian access to site – there may be legal implications to the provision of suitable pedestrian/cycle links; - Access issues/options not yet proven; - Opportunity to deliver with adjacent site(s). Masterplan, phasing and access details required to consider further; and - The site is elevated and open/visually prominent within the landscape, particularly

Option Reference number	SHELAA Reference	Site	Parish/ Settlement (if differs)	Potential Yield (Dwellings)	Further issues for assessment
					in the southeastern corner and mitigation is unknown.
OFF8	1232/1410	Hempstead Farm, Uckfield	Uckfield	200	<ul style="list-style-type: none"> - New access route would need to go across the floodplain, which also raises viability concerns; - Re-provision of sporting facilities and rugby pitch in the west of the site also required; - Encroachment into countryside – particularly to the north and east, requires further consideration; - Approx 4.85ha of site within Flood Zones 2 and 3, which is significant obstacle to overcome; - Site is bisected by River Uck – access across whole site difficult; and - Heritage assets sit adjacent to the site – further detail needed on 'setting'.
OFR1	729/1610	Land at Ramslye Farm (Spratsbrook Farm), Tunbridge Wells	Frant/ Tunbridge Wells	300	<ul style="list-style-type: none"> - Significant parcels of Ancient Woodland within the site, and heritage assets adjacent – further details needed on specifics of development/extent, in order to assess and agree; - The site is within the High Weald National Landscape – introduction of significant built form. Would need to be considered for cumulative landscape impact and require further evidence/ assessment; and

Option Reference number	SHELAA Reference	Site	Parish/ Settlement (if differs)	Potential Yield (Dwellings)	Further issues for assessment
					<ul style="list-style-type: none"> Consider access/options with adjacent sites.
OFR2	443/1610	Strawberry Hill Farm, Eridge Road, Tunbridge Wells	Frant/ Tunbridge Wells	50	<ul style="list-style-type: none"> High visual prominence in the High Weald National Landscape – introduction of built form. Would need to be considered for cumulative impact and require further evidence/assessment; Consider access/options with adjacent sites; and Site levels change/boundary needs further consideration.
OHA1	252/1310	Land adjoining Waldernheath, Amberstone, Hailsham	Hailsham	8	<ul style="list-style-type: none"> Difficulty with access arrangements – proximity to junction of A271 and New Road; and Further detail required on vehicular access and pedestrian crossing/ connectivity to bus stops.
OHA2	903/1310	Land and access track to the rear of 168 Battle Road, Hailsham	Hailsham	10	<ul style="list-style-type: none"> Existing access potentially unsuitable and requires further details. An alternative access relies on third party land, and unknown if feasible;
OHA3	1033/1310	Victoria Road Car Park, Hailsham	Hailsham	20	<ul style="list-style-type: none"> Loss of public parking spaces – no replacement identified or details of scheme to address this issue. Site is constrained by neighbouring development in location/form/ height. Further details needed to consider site capacity; and

Option Reference number	SHELAA Reference	Site	Parish/ Settlement (if differs)	Potential Yield (Dwellings)	Further issues for assessment
					<ul style="list-style-type: none"> - Adjacent/near to heritage assets which require further consideration.
OHA4	1223/1310	25 London Road, Hailsham, East Sussex	Hailsham	5	<ul style="list-style-type: none"> - Loss of parking spaces – no replacement identified or details of how addressed; and - Site is constrained by neighbouring development in location/form/ height. Further details needed to consider site capacity.
OHA5	1259/1310	Mushroom Farm, Saltmarsh Lane, Downash, Hailsham	Hailsham	400	<ul style="list-style-type: none"> - Lacks pedestrian connectivity to town centre and some distance from services/ facilities by non-car modes of transport; - Access along Saltmarsh Lane is currently unsuitable. Vehicular access requires significant upgrading – may not always be useable due to flood risk; - Alternative access relies on third party land – the site to the north, and no details are provided on whether this is suitable/feasible; - Within the hydrological catchment of the Pevensey Levels.
OHE1	974/3000	Windy Ridge, Featherbed Lane, Hellingly	Hellingly/ Hailsham	5	<ul style="list-style-type: none"> - No pedestrian or cycling connectivity to the wider settlement and limited opportunity to deliver them. Further details required to consider issue; and - No suitable vehicular access arrangements – existing access is shared with neighbouring properties.

Option Reference number	SHELAA Reference	Site	Parish/ Settlement (if differs)	Potential Yield (Dwellings)	Further issues for assessment
OHE2	1079/3100	Land at Broad Farm, south of New Street, Lower Horsebridge	Hellingly/ Lower Horsebridge	400	<ul style="list-style-type: none"> · Access options would need to consider highway safety, speed limit and infrastructure required. Further details needed; and · Development would be of a significant scale and likely have an impact on landscape. Further evidence/scheme details needed to consider this issue further.
OHE3	1081/3000	Hursthaven Nursery, New Road, Hellingly	Hellingly/ Hailsham	5	<ul style="list-style-type: none"> · Existing vehicular access unsuitable – narrow and affected by flooding at times. Alternative access would be needed through and with adjacent sites – no details provided to show feasible option at this stage; and · No pedestrian footpath or cycle infrastructure – limited scope to provide. Requires resolution through use of third-party access/land.
OHE4	1264/1310	Land at New Road, Hellingly	Hellingly/ Hailsham	10 + C2 use	<ul style="list-style-type: none"> · No pedestrian or cycling connectivity and limited opportunity to deliver them. Further details required to consider this issue; · Vehicular access challenging due to proximity with the junction with the A271 to the south - poor visibility splays; · Safe pedestrian crossing required; and · Further detail required on vehicular access and pedestrian crossing/connectivity to bus stops.

Option Reference number	SHELAA Reference	Site	Parish/ Settlement (if differs)	Potential Yield (Dwellings)	Further issues for assessment
ORO1	1015/1110	Orchard Farm (formerly Tubwell Farm), Tubwell Lane, Crowborough	Rotherfield/ Crowborough	40	<ul style="list-style-type: none"> Existing vehicular access unsuitable – narrow lane, no scope for widening; A new access to Hadlow Down Road could be problematic given the bend and steep banking along the roadside; Access proposals need to seek the least visually intrusive and safest option to reduce adverse effects on the bank and transition location in the countryside. Further details required; and The site itself has sloping topography in High Weald National Landscape. Further details needed on the scheme to fully assess the landscape impact.
ORO2	1257/1110	Highfields Farm, Rotherfield	Rotherfield	8	<ul style="list-style-type: none"> In an area of high landscape sensitivity within High Weald National Landscape; and The whole site is visually prominent in the High Weald National Landscape – although the western part is less sensitive due to existing buildings present so may be suitable for some development. Further detail needed to assess this impact.
OWI1	1226/2040	The Paddock, Lealands Farm, Station Road, Groombridge, Tunbridge Wells	Withyham/ Groombridge	8	<ul style="list-style-type: none"> Site lacks safe pedestrian access – potential for nearby designated footway connection to reach the Public Right of Way (Withyham 32) to connect to the village centre via the bridge over the Spa Valley Rail line. Further detail needed; and

Option Reference number	SHELAA Reference	Site	Parish/ Settlement (if differs)	Potential Yield (Dwellings)	Further issues for assessment
					<ul style="list-style-type: none"> The site is within High Weald National Landscape – small-scale, low-density scheme required to reflect that and village location, edge of settlement. Further detail needed.

Source: pages 80 – 89 Draft Wealden Local Plan February 2026.

Appendix E

Sustainability Objectives

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 Per capita CO ₂ and total emissions in the local authority area, including the breakdown for buildings, industry and transport (Department of Energy and Climate Change) 1.3 Car and van availability by household in the local authority area (East Sussex in Figures) 1.4 Publicly available electric vehicle charging devices at all speeds within the local authority area (Department for Transport) 1.5 Increase (Ha) in community allotments/orchards (Council records)
	1.2	Ensure energy efficiency?	
	1.3	Promote the use of decentralised, renewable and low carbon energy?	
	1.4	Support the provision of electric charging infrastructure to enable the take up of electric vehicles?	
	1.5	that development is located in sustainable locations?	
	1.6	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 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 The percentage of all non-domestic energy performance certificates at band C and above (Department for Levelling Up, Housing and Communities) 2.4 Woodland as percentage of area in the local authority area; (Forest Research, Department of Agriculture, Environment and Rural Affairs).
	2.2	Ensure the use of sustainable construction and design i.e. reduce overheating, incorporate trees /GI for urban cooling?	
	2.3	Maximise opportunities to deliver nature-based solutions i.e. green infrastructure	
	2.4	Provide for future changes in energy supply?	
	2.5	Ensure there is suitable energy infrastructure capacity?	

Sustainability Objective	Decision Making Criteria	Sustainability Indicators
<p>SO3 FLOOD RISK</p> <p>To manage and reduce our vulnerability to flood risk taking into account climate change</p>	<p>3.1 Reduce the risk of, and minimise flooding from all known sources, taking into account the impact of climate change?</p> <p>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?</p> <p>3.3 Support the provision of natural flood management solutions?</p> <p>3.4 Encourage best practice measures for managing flood risk (i.e. SuDS or other flood alleviation measures)</p>	<p>3.1 Estimated number of properties in the local authority area at risk from flooding (Environment Agency)</p> <p>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)</p>
<p>SO4 WATER RESOURCES AND WATER QUALITY</p> <p>Protect our water resources and reduce water demand and consumption</p>	<p>4.1 Promote measures to minimise water consumption and use?</p> <p>4.2 Encourage water efficiency?</p> <p>4.3 Ensure infrastructure is adequate to support water supply and sewer connections?</p> <p>4.4 Ensure that wastewater treatment infrastructure is available?</p> <p>4.5 Protect water resources including those used for the supply of water and abstraction?</p> <p>4.6 Improve the water quality of water resources?</p>	<p>4.1 Southeast Water Per Capita Consumption of Water in litres (South East Water)</p> <p>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 Pevensy Marshes (Environment Agency)</p> <p>4.3 Percentage of river and groundwater units in the plan area with biological and/or chemical quality rated as good (Environment Agency)</p> <p>4.4 Bathing Water Quality in Wealden District (Environment Agency)</p> <p>4.5 Planning permission granted contrary to Environment Agency advice on water quality grounds (Environment Agency)</p>

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?	

Sustainability Objective	Decision Making Criteria		Sustainability Indicators
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 greenspaces 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		8.6 Quantity of open spaces provided through residential developments annually (Council Records).

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 Pevensy 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?	

Sustainability Objective	Decision Making Criteria		Sustainability Indicators
<p>SO10 LANDSCAPE & TOWNSCAPE</p> <p>To protect and enhance the District's urban and rural landscape and townscape</p>	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?	
<p>SO11 HISTORIC AND CULTURAL HERITAGE</p> <p>To improve and enhance the District's historic environment and cultural heritage asset</p>	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?	

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 SUSTAINABLE TRAVEL & 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?	

Sustainability Objective	Decision Making Criteria		Sustainability Indicators
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)
	14.4	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
	14.5	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
	14.6	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)
	14.7	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)

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)

Sustainability Objective	Decision Making Criteria	Sustainability Indicators
<p>SO16 QUALITY OF LIFE & PLACE</p> <p>To create safe and attractive places, which contribute towards quality of life and community cohesion</p>	<p>16.1 Help to reduce crime and fear of crime in the district?</p> <p>16.2 Promote the use of secured by design principles, which contribute towards a safe and secure built environment?</p> <p>16.3 Contribute to the creation of a sense of place, which is well-designed, inclusive, accessible for all and reduces social isolation?</p> <p>16.4 Ensure good quality design including the use of design codes, where appropriate?</p>	<p>16.1 The recorded rate of crime offences per 1,000 of the Wealden population (East Sussex County Council Record)</p> <p>16.2 The recorded rate of violent crime offences per 1,000 of Wealden population (East Sussex County Council Record)</p>
<p>SO17 SOCIAL DEPRIVATION</p> <p>To tackle social deprivation by improving access to essential services and facilities, supporting diversity and equality for all</p>	<p>17.1 Help to overcome social exclusion?</p> <p>17.2 Help to address issues of deprivation, disadvantage or poverty?</p> <p>17.3 Help address inequality for those with protected characteristics?</p> <p>17.4 Help reduce dependency on benefits?</p> <p>17.5 Encourage engagement and participation in the community?</p>	<p>17.1 Indices of Multiple Deprivation Ranking across the Country (Department for Levelling Up, Housing and Communities);</p> <p>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);</p> <p>17.3 Percentage of children in low income families within the monitoring period (East Sussex County Council Record);</p> <p>17.4 The number universal credit claimants in the local authority area each monitoring period (East Sussex County Council Record)</p> <p>17.5 No. of residents in fuel poverty at local/regional and national level. (ONS)</p>

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?	

Sustainability Objective	Decision Making Criteria		Sustainability Indicators
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)

Source Initial Sustainability Appraisal March 2024¹⁴

¹⁴ [Initial-Sustainability-Appraisal-March-2024.pdf](#)

Appendix F

Sustainability Appraisal critique – an example from the Reg.18(1) consultation for allocation WES 7

An example of a critique of the Reg.18(1) (2024) Sustainability Appraisal for allocation WES 7 in the Parish of Westham undertaken for the 2024 consultation is detailed below.

Wealden's 2024 Sustainability Appraisal summary of the impacts of allocation site WES 7 on the 20 Sustainability Objectives is included below – this has been pasted from the Initial Sustainability Appraisal Appendices A11M – A11EE¹⁵.

Pages 106 - 148 below shows this assessment for allocation WES 7

The Council's assessment concluded that only the western part of WES 7 site is suitable for an allocation of 150 houses. The central and eastern parts of the site were deemed unsuitable for development.

However, on inspecting Wealden's assessment for WES 7, it was found that it contained several errors and some omissions. A critique was compiled identifying the errors and omissions and with these corrections, it was clear that the site and the development proposal was far less sustainable than indicated from Wealden's appraisal of the site.

Below is the summary of Wealden's assessment against the 20 sustainability objectives to which has been added a further column containing my assessment of the impacts of the developed site on the Sustainability Objectives. Clearly, my assessment demonstrates that the development would be unsustainable.

¹⁵ [Initial-Sustainability-Appraisal-Appendices-A11M-A11EE-March-2024.pdf](#)

Sustainability Objective		Wealden Score	Reviewed Score
S01	Climate Change Mitigation	minor negative	major negative
S02	Climate Change Adaption	uncertain	uncertain
S03	Flood Risk	not significant	minor negative
S04	Water Resources & Quality	not significant	uncertain
S05	Soil, Land & Minerals	uncertain	uncertain
S06	Waste	minor negative	minor negative
S07	Pollution	minor negative	major negative
S08	Green & Blue Infrastructure	major positive	uncertain
S09	Biodiversity	major positive	minor negative
S010	Landscape & Townscape	minor negative	major negative
S011	Historic & Cultural Heritage	minor negative	minor negative
S012	Digital Infrastructure	uncertain	minor negative
S013	Travel & Accessibility	uncertain	uncertain
S014	Housing	major positive	major positive
S015	Health & Wellbeing	minor positive	uncertain
S016	Quality of Life & Place	minor positive	uncertain
S017	Social Deprivation	uncertain	uncertain
S018	Economy & Employment	not significant	not significant
S019	Town & Village Centres	not significant	not significant
S020	Education & Skills	uncertain	uncertain

Below is Wealden’s 2024 sustainability appraisal for site WES 7 followed by a detailed critique of this appraisal.

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overa II	Commentary	
SO1	CLIMATE CHANGE MITIGATION					<ul style="list-style-type: none"> The site comprises an area of agricultural fields, paddocks and farm buildings located at the northern periphery of Westham. The site is 32.49ha in size and is proposed for up to 400 (net) dwellings. Westham is classed as a local service centre and is a settlement with a limited supply of social and economic infrastructure and where local residents depend upon other larger settlements to meet a broad range of needs. Westham lies in very close proximity to Eastbourne. The nearest bus stop is approx. 100m from the site on Peelings Lane and provides a frequent and regular bus service to the larger settlements of Eastbourne and Hailsham. The site is located approximately 300m from the nearest train station in Westham, which offers services to London, Brighton and Hastings. The bus stop adjacent the site does provide a route to Eastbourne Train Station. There are currently no footpaths located on Peelings Lane in this location. There are footpaths located on Peelings Lane to the south east and south west of the site. Due to the narrow form of Peelings Lane and its steep embankments, pedestrian footpaths could only be provided towards the south west. Development will result in an increase in greenhouse gas emissions in both the construction and operation of any development and mitigation measures will need to be identified to minimise the impacts through sustainable methods of construction and design, energy efficiency and the use of renewable/low carbon energy. The site complies with the overall Spatial Strategy for the district as it is located within a sustainable settlement and within close proximity to sustainable transport. Any development will need to comply with the most up to date Building Regulations, as relevant to the development, and take account of the Future Homes and Building Standards. The promoter for the site has confirmed that climate change mitigations such as walkable and cycleable neighbourhoods and adapting to new technologies and sustainability standards will be brought forward as part of development. 	

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overall	Commentary	
						<ul style="list-style-type: none"> Other policies within the Local Plan will address matters of energy efficiency in new buildings, embodied carbon and sustainable design and construction and any development will need to be in compliance with the relevant policies. All development will result in an increase in greenhouse gas emissions and therefore a minor negative impact is expected overall. Mitigation measures will need to be identified to minimise the impact as far as possible, although a residual minor negative impact is likely to remain. 	
SO2	CLIMATE CHANGE ADAPTATION					<ul style="list-style-type: none"> The site is greenfield currently and development of the site would introduce impermeable surfaces, which could make the site vulnerable to the impacts of climate change, specifically surface water flood risk and overheating. A watercourse (Martins Ditch and Gut) form the northern boundary of the site. There are large areas of flood zone 2, 3a and 3b as defined by the Environment Agency mapping and the Wealden Strategic Flood Risk Assessment associated with the northern and eastern parts of the site. The southern and south western part of the site is located within Flood Zone 1. The promoter has indicated via a submission that climate change adaptations such as providing opportunities for growing food via allotments will be brought forward on site. Furthermore a suitable SuDS will also be brought forward. Other policies within the Local Plan will address the provision of climate change adaptation measures such as green and blue infrastructure and any development will need to be in compliance with the relevant policies. The promoter has indicated some of the measures of how the site can adapt to climate change, therefore uncertain at this stage over all timeframes. 	
SO3	FLOOD RISK					<ul style="list-style-type: none"> A watercourse (Martins Ditch and Gut) form the northern boundary of the site. There are large areas of flood zone 2, 3a and 3b as defined by the Environment Agency mapping and the Wealden Strategic Flood Risk Assessment associated with the northern and eastern parts of the site. The southern and south western part of the site is located within Flood Zone 1. 	

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overall	Commentary	
						<ul style="list-style-type: none"> The site is also affected by surface water flood risk as defined by the Wealden Strategic Flood Risk Assessment. These areas are focused sporadically throughout the site and extend along the boundaries here also. It is likely given the size of the proposed development that suitable mitigation for surface water flood risk could be implemented. The northern and eastern parts of the site lie in an area of groundwater concern and therefore may be at risk of groundwater flooding. Further investigations would be required as part of any development. Only water compatible uses are permitted within Flood Zone 3b in line with government guidance on flood risk and coastal change. The development proposed on the site is therefore suitable, however a sequential approach to the location of development on site will need to be taken to direct development first to the areas of the site not at risk of flooding. Residential development would be precluded from those areas of the site within Flood Zones 2 and 3a and 3b. Mitigation measures will need to be provided for the site in terms of surface water runoff as development will introduce impermeable surfaces. The promoter has indicated as part of a vision document that development would involve new network of SuDS ponds and swales, which follow the site's topography, located in lower lying land and outside of the flood zone, providing a three stage system to ensure there are no adverse impacts to the local water system and Pevensey Levels and aim for betterment The promoter has also indicated that a wetlands area would be created in the north of the site and this will be managed Other policies within the Local Plan will cover the provision of SuDS and the management of flood risk from all sources, and any development of the site will need to comply with these policies. Given that the site is at risk of flooding from multiple sources, but that suitable mitigation has been demonstrated via proposals and will be achieved by local plan policies, it is considered that there is no significant effect on this SA Objective. 	
SO4	WATER RESOURCES					<ul style="list-style-type: none"> Wealden has been identified as an area of serious water stress. 	

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overall	Commentary	
	& QUALITY					<ul style="list-style-type: none"> The development of this site will increase the demand for water consumption and wastewater treatment. A watercourse (Martins Ditch and Gut) form the northern boundary of the site Development of the site could exacerbate the rivers poor status through potential pollution, directly and indirectly through surface runoff and discharge. The promoter has indicated that a three stage system to ensure there are no adverse impacts to the local water system and Pevensey Levels and aim for betterment The site is not within a groundwater source protection zone. Other policies within the Local Plan will address the protection of the water environment, water infrastructure and water efficiency and any development will need to be in compliance with the relevant policies. Development will also need to comply with the most up to date Building Regulations, as relevant, and the requirements of the Environment Act 2021. Whilst a water course is located along the north of the site and development would potentially impact upon its quality, the promoter has indicated that this will be mitigated as part of the development and therefore there is no significant effect on this SA Objective. 	
SO5	SOIL, LAND & MINERALS					<ul style="list-style-type: none"> The site is partly agricultural land but not classified within the Agricultural Land Classification system (ALC). The site is not safeguarded for waste or minerals operations. The site is greenfield. There are no known issues with contamination of land. Development of the site is unlikely to result in land contamination. However, the disturbance of soil from development could lead to increased soil compaction as well as the release of CO₂ emissions. Mitigation measures will need to be identified, which safeguard the soils health, particularly during construction. Other policies within the Local Plan will address matters of soil health and protection as well as biodiversity and land contamination, and any development will need to be in compliance with the relevant policies. 	

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overa II	Commentary	
						<ul style="list-style-type: none"> Therefore, the impacts on this SA Objective are considered to be uncertain at this stage. 	
SO6	WASTE					<ul style="list-style-type: none"> Suitable mitigation measures will need to be identified to reduce the impact of waste as far as possible in both the construction and operation of any development. Policies within the Local Plan will address matters of waste management and any development will need to be in compliance with the relevant policies. The impact on this SA Objective is likely to be minor negative in both construction and operation of any development 	
SO7	POLLUTION					<ul style="list-style-type: none"> The site is to the north of the existing built form of Westham. The majority of the site (western half) is within an area classified as being 'darker in CPREs light pollution mapping. The south eastern part of the site classified as being 'brighter'. Given the potential quantum of development, significant light pollution will be introduced. Any development would still need to minimise external lighting and be in compliance with other Local Plan policies on this. Westham is classed as a local service centre and is a settlement with a limited supply of social and economic infrastructure and where local residents depend upon other larger settlements to meet a broad range of needs. Westham lies in very close proximity to Eastbourne. The site is located approximately 500m from the nearest train station in Westham, which offers services to London, Brighton and Hastings. The bus stop adjacent the site does provide a route to Eastbourne Train Station. There are currently no footpaths located on Peelings Lane in this location. There are footpaths located on Peelings Lane to the south east and south west of the site. Due to the narrow form of Peelings Lane and its steep embankments, pedestrian footpaths could only be provided towards the south west. There are currently no areas of the district where air pollution is in excess of national air quality targets and there are no Air Quality Management Areas (AQMAs) within the district. This does not mean that air pollution issues won't arise in future as a result of development, but Local Plan policies will provide mitigation. It is expected that an increase in housing will result in a degree of increase in air pollution during the construction phase and also through the use of energy in any completed 	

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overall	Commentary	
						<p>development. The increase in air pollution from construction is likely to be in the short to medium term.</p> <ul style="list-style-type: none"> The development of the site will result in an increase in traffic during construction, with a potential increase in air pollution, however any negative effects are likely to be in the short to medium term as well. Given the scale of development proposed, there is likely to be a significant increase in traffic and congestion on the road network, although this may be mitigated to some degree through the provision of services and facilities on the site for residents to access. Transport surveys and modelling will be required to ascertain the impact on the road network and identify mitigation measures. Development would also be required to take into consideration noise generated from the A27 to the north of the site and what mitigations would be required for this. Contamination may be present within the south eastern part of the site around the existing farm buildings and further investigation would be required/ Other policies within the Local Plan will address matters of air, noise and light pollution and any development will need to be in compliance with the relevant policies. Given the size of the site it is likely to result in a significant number of additional cars on the road. Therefore, minor negative effects are expected on this SA Objective, specifically in relation to air pollution from traffic emissions. Mitigation measures are likely possible to reduce emissions from buildings through appropriate application of relevant Local Plan policies. 	
SO8	GREEN & BLUE INFRASTRUCTURE					<ul style="list-style-type: none"> The mature hedgerows and trees within the site and along its boundaries of the site provide wildlife corridors and stepping stones to the wider countryside and enclose the site from the wider area. Development of the site would need to seek to retain and enhance the existing hedgerows and trees on the boundaries to maintain and enhance the green infrastructure network. A number of trees on the southern boundary of the site are protected by group TPO No 19, 198. 	

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overall	Commentary	
							<ul style="list-style-type: none"> Any development would need to provide a minimum of 20% biodiversity net gain (BNG) on site and/or off-site, which would contribute to the green and blue infrastructure network. The promoter for the site has indicated a significant range of measures to provide and enhance green and blue infrastructure within the site, which will contribute to the wider green infrastructure network. It has been indicated that the site would include community orchards and paddocks, open space areas and a wetlands. Other policies within the Local Plan will address matters of the retention, protection and creation of green and blue infrastructure and a green and blue infrastructure network, and any development will need to be in compliance with the relevant policies. Therefore, a minor negative effect is likely in the short to medium term as the site is developed, however over the longer term major positive effects are expected as green and blue infrastructure is enhanced.
SO9	BIODIVERSITY						<ul style="list-style-type: none"> The mature hedgerows and trees on the boundaries of the site provide wildlife corridors and stepping stones to the wider countryside. The trees and hedgerows contribute towards the green infrastructure network of the site as well as to the wider greenfield network. An area of coastal and floodplain grazing marsh priority habitat is located within the northern and eastern halves of the site and corresponds to the area within Flood plains. The Pevensy Levels SSSI, SAC and Ramsar site lies adjacent the sites northern boundary. Any development would need to provide a minimum of 20% biodiversity net gain (BNG) on site and/or off-site. The site is located partially within the Pevensy Levels Biodiversity Opportunity Area. Development could adversely impact on the objectives of the BOA. Development would need to carefully consider the priorities and objectives of the BOA and ensure mitigation measures are implemented to avoid any harm and to enhance habitats where possible. Other policies within the Local Plan will address the protection and enhancement of biodiversity, as well as the requirement to provide at least 20% BNG together with the

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overall	Commentary	
						<p>retention and protection of trees, woodlands and hedgerows. Development would need to be in compliance with the relevant polices.</p> <ul style="list-style-type: none"> The promoter has indicated as part of the vision document that assuming the grassland areas in any new country park are managed in a way which improved the ecological value, a BNG of over 20% could be easily achieved across the site. Therefore, a minor negative effect is likely in the short to medium term as the site is developed, however over the longer term major positive effects are expected as the measures to improve biodiversity become established. 	
SO10	LANDSCAPE & TOWNSCAPE					<ul style="list-style-type: none"> The 2023 Landscape Sensitivity Assessment states that the site landscape is moderately to highly sensitive. This is 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. It is considered that landscape impacts in the central and eastern portions of the site are substantial and that it would not be appropriate to deliver housing in this part of the site. There are two fields in the south western portion of the site (including SHELAA reference 732/3360) that are well screened by existing landscape features and the visual impact of development would be more limited in these locations. Given the above reasons, it is considered the effects on this SA Objective are minor negative as development of the quantum envisioned on this site would be out of keeping with the general character and appearance of the countryside to the Westham. However, development within the south western parts of the site would be more enclosed and capable of accommodating development. 	
SO11	HISTORIC & CULTURAL HERITAGE					<ul style="list-style-type: none"> The Pevensey and Westham Conservation lies to the south east of the site. This contains a number of Listed Buildings and also Pevensey Castle, which could have their historic setting detrimentally impacted by development. The Pevensey & Westham Archaeological Notification Area covers the southern part of the site. It is considered that development within the eastern parts of the site would have a detrimental impact upon the historic assets to the south east of the site. 	

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overall	Commentary	
						<ul style="list-style-type: none"> Any development would need to respect this historic setting and consider what mitigations would be required to lessen the impact of development. Given the large number of heritage assets in close proximity to the site, including Pevensey Castle, the effect is expected to be minor negative but this could be reduced through suitable mitigation measures. 	
SO12	DIGITAL INFRASTRUCTURE					<ul style="list-style-type: none"> Due to Wealden's rural infrastructure the district broadband service lags behind national levels, with only 47% of all premises (residential and business) covered by at least one broadband operator for a fixed download speed. Other policies within the Local Plan will address matters of digital infrastructure provision and any development will need to be in compliance with the relevant policies. The impact on this SA Objective is currently uncertain. 	
SO13	SUSTAINABLE TRAVEL & ACCESSIBILITY					<ul style="list-style-type: none"> The site benefits from a vehicular access at the south eastern corner of the site onto Peelings Lane. It is considered that this cannot be suitably upgraded to serve development given the steep lined banks of Peelings Lane and it's narrow nature at this section of the site. The site may be able to achieve a vehicular access at the south western corner of the site, however, this would require the widening of Peelings Lane to allow for two lane traffic and pedestrian footpaths. There are currently no footpaths located on Peelings Lane in this location. There are footpaths located on Peelings Lane to the south east and south west of the site. Due to the narrow form of Peelings Lane and its steep embankments, pedestrian footpaths could only be provided towards the south west. It is considered that a suitable vehicular and pedestrian access could be provided to the south western parts of the site, therefore the development of the remaining eastern and northern part of the site would not be acceptable. Westham is classed as a local service centre and is a settlement with a limited supply of social and economic infrastructure and where local residents depend upon other larger settlements to meet a broad range of needs. Westham lies in very close proximity to Eastbourne. 	

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overall	Commentary	
						<ul style="list-style-type: none"> The nearest bus stop is approx. 100m from the site on Peelings Lane and provides a frequent and regular bus service to the larger settlements of Eastbourne and Hailsham. The site is located approximately 500m from the nearest train station in Westham, which offers services to London, Brighton and Hastings. The bus stop adjacent the site does provide a route to Eastbourne Train Station. Public right of way (Westham 5b) runs north to south through the eastern part of the site. Other policies within the Local Plan will address matters of sustainable travel and accessibility and any development will need to be in compliance with the relevant policies. Whilst the site is located adjacent sustainable public transport options and is located within the sustainable settlement of Westham, the effect on SA Objective is currently considered uncertain at this stage given that is 'unknown' whether a suitable vehicular or pedestrian access can be provided to the site. It is important to note that development is only suitable within the south western part of the site as Peelings Lane narrows significantly to the east and would not allow for the creation of a suitable vehicular or pedestrian access. 	
SO14	HOUSING					<ul style="list-style-type: none"> The proposed development of up to 400 (net) dwellings will significantly contribute to the Council's housing need. This will be further enhanced by the provision of affordable homes, Lifetime homes and/or self-build/custom homes, but specific details are lacking. Therefore major positive effects are expected on this SA Objective. 	
SO15	HEALTH & WELLBEING					<ul style="list-style-type: none"> The nearest health services are at the Westham Surgery, approx. 350m to the south east of the site. This cannot currently be accessed by pedestrian footpaths, however, it is likely that these can be provided as part of any development. The High Weald Lewes Havens CCG has identified significant issues with GP surgery capacity within Westham Parish. Any development is likely to have some impact on GP capacity. The Wealden Open Space Study 2022 concludes that there is not a deficit of open space within Westham Parish. The Study priorities exploring opportunities to increase quantity shortfalls and to improve existing open space within the Parish. 	

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overall	Commentary	
							<ul style="list-style-type: none"> The Wealden Playing Pitch and Outdoor Sports Assessment identifies that there is no deficiency in provision of sports pitches within the Parish however it does make recommendations that pitches and facilities are protected and enhanced for quality purposes. The site is not a designated Local Green Space nor is it a formal recreational or play space. Given the size of the proposed development, it is considered there would be minor positive effects on this SA Objective through contributions to health and wellbeing enhancements.
SO16	QUALITY OF LIFE & PLACE						<ul style="list-style-type: none"> The proposals have indicated that community facilities such as allotments will be provided on site. Furthermore, there will be significant open space provision and the implementation of walkable and cyclable neighbourhoods. Development will need to comply with other Local Plan policies, which will address matters of design and quality of life within the district as well as the District's Design Code. Given the above, the effects on this SA Objective are expected to be minor positive.
SO17	SOCIAL DEPRIVATION						<ul style="list-style-type: none"> Given the size of the site, it is considered there will be the potential for significant provision of affordable housing, custom and self-build homes and play space contributions as well, which will contribute to quality-of-life improvements. Some of these details have been provided by the promoter however, further information is required. Given the above, the effects on this SA Objective are expected to be minor positive.
SO18	ECONOMY & EMPLOYMENT						<ul style="list-style-type: none"> The proposed development is for housing only and therefore jobs may be created in the short term in relation to construction, having a minor positive effect. However, as the site does not offer any employment provision, it is considered that the site would have no significant effect in the medium to longer term on this SA Objective.
SO19	TOWN &						<ul style="list-style-type: none"> The site is not proposing any retail floorspace.

SUSTAINABILITY OBJECTIVE		Effects				Site No: 1099/3360	Name: Land at Peelings Lane, Westham
		S	M	L	Overa II	Commentary	
	VILLAGE CENTRES					<ul style="list-style-type: none"> The site does not contain any existing retail floorspace so there is no loss. The site is in close proximity to the services and facilities in Hailsham, together with public transport, so future residents would have good access to the town centre. The development of this site would place future residents within close proximity of the sustainable settlement of Westham and its associated services and amenities. However, due to the scale of potential development on this site, it is considered there would be no significant effect on this SA Objective as the viability and long-term vitality of Westham will continue nonetheless. 	
SO20	EDUCATION & SKILLS					<ul style="list-style-type: none"> There may be the potential through local job creation during construction to improve skills and training in construction related apprenticeships. The nearest nursery and primary school is the Pevensey and Westham Church of England School, approximately 350m to the south east of the site and can be accessed via pedestrian footpaths. Further primary, secondary and college provision is located within Eastbourne approximately 2km to the south west. Information from East Sussex County Council, as the education provider for state schools, indicates that there is currently a surplus of education provision within the parish. The impact is likely to be minor positive in the short term in regard to skills and training in construction, however given the size of the site there may be some degree of pressure on school place provision which would need to be investigated via discussions as part of the planning application process. Therefore, the effects over the longer term are uncertain at this time. 	

SUMMARY OF RESULTS:		Site No: 1099/3360		Name: Land at Peelings Lane, Westham																	
SA EFFECTS	SO1 Climate Change	SO2 Climate Change	SO3 Flood Risk	SO4 Water	SO5 Soil, Land & Minerals	SO6 Waste	SO7 Pollution	SO8 Green & Blue Infrastructure	SO9 Biodiversity	SO10 Landscape &	SO11 Historic & Cultural	SO12 Digital Infrastructure	SO13 Travel & Accessibility	SO14 Housing	SO15 Health & Wellbeing	SO16 Quality of Life & Place	SO17 Social Deprivation	SO18 Economy &	SO19 Town & Village	SO20 Education & Skills	
Major Positive																					
Minor Positive																					
Not Significant																					
Minor Negative																					
Major Negative																					
Uncertain																					
COMMENTARY:																					
Duration/Reversibility	Short term adverse impacts are likely during construction or before the mitigation measures are implemented																				
Mitigation Measures	<p>Further information is required for the issues identified as uncertain. No mitigation measures are proposed at present as there are no detailed plans for the site. Other policies within the Local Plan will cover mitigation measures and any development will need to comply with the relevant policies:</p> <ul style="list-style-type: none"> • Climate change adaptation and mitigation • Biodiversity creation, protection and enhancement • Flood risk – including surface water flood risk / drainage. • Landscape and townscape • Health and wellbeing • Sustainable transport 																				

	<ul style="list-style-type: none"> • Infrastructure
Cumulative Effects	<p>The site does not currently benefit from planning permission nor any application for development. Westham is classed as a local service centre and is a settlement with a limited supply of social and economic infrastructure and where local residents depend upon other larger settlements to meet a broad range of needs. Westham lies in very close proximity to Eastbourne. Should this site come forward for development, together with other land within the area, further work will need to be undertaken to understand the impact on the transport network (through a county-wide transport model) and other infrastructure such as education, health services and community facilities. However, it is acknowledged that development of this site, alone and in combination with other sites, will result in pressures on infrastructure, built and natural.</p>
Summary	<p>Major positive effects: SO8 Green & Blue Infrastructure; SO9 Biodiversity SO14 Housing</p> <p>The promoter for the site has indicated a significant range of measures to provide and enhance green and blue infrastructure within the site, which will contribute to the wider green infrastructure network. It has been indicated that the site would include community orchards and paddocks, open space areas and a wetlands.</p> <p>The promoter has indicated as part of the vision document that assuming the grassland areas in any new country park are managed in a way which improved the ecological value, a BNG of over 20% could be easily achieved across the site.</p> <p>The proposed development of up to 400 (net) dwellings will significantly contribute to the Council's housing need. This will be further enhanced by the provision of affordable homes, Lifetime homes and/or self-build/custom homes, but specific details are lacking.</p> <p>Minor Positive effects: SO15 Health & Wellbeing and SO16 Quality of Life & Place</p> <p>Given that the site is in close proximity of health services and that the scale of development is likely to mean some degree of contributions towards and health and wellbeing improvements could be achieved, the effect is considered to be minor positive.</p> <p>The proposals have indicated that community facilities such as allotments will be provided on site. Furthermore, there will be significant open space provision and the implementation of walkable and cyclable neighbourhoods.</p> <p>Major negative effects: None</p> <p>Minor negative effects: SO1 Climate Change Mitigation; SO6 Waste; SO7 Pollution; SO9 Landscape & Townscape and SO11 Historic & Cultural Heritage</p>

All development will result in an increase in greenhouse gas emissions and therefore a minor negative impact is expected overall. Mitigation measures will need to be identified to minimise the impact as far as possible, although a residual minor negative impact is likely to remain.

The impact on this SA Objective is likely to be minor negative in both construction and operation of any development.

Given the size of the site it is likely to result in a significant number of additional cars on the road despite the provision of services and facilities on site as part of the proposals. Therefore, minor negative effects are expected on this SA Objective, specifically in relation to air pollution from traffic emissions. Mitigation measures are likely possible to reduce emissions from buildings through appropriate application of relevant Local Plan policies.

Given the above reasons, it is considered the effects on this SA Objective are minor negative as development of the quantum envisioned on this site would be out of keeping with the general character and appearance of the countryside to the Westham. However, development within the south western parts of the site would be more enclosed and capable of accommodating development.

Given the large number of heritage assets in close proximity to the site, including Pevensey Castle, the effect is expected to be minor negative, but this could be reduced through suitable mitigation measures.

No significant effect: SO3 Flood Risk; SO4 Water Resources/Quality; SO19 Town & Village Centres and SO20 Education & Skills

Given that the site is at risk of flooding from multiple sources, but that suitable mitigation has been demonstrated via proposals and will be achieved by local plan policies, it is considered that there is no significant effect on this SA Objective.

Whilst a water course is located along the north of the site and development would potentially impact upon its quality, the promoter has indicated that this will be mitigated as part of the development and therefore there is no significant effect on this SA Objective.

The development of this site would place future residents within close proximity of the sustainable settlement of Westham and its associated services and amenities. However, due to the scale of potential development on this site, it is considered there would be no significant effect on this SA Objective as the viability and long-term vitality of Westham will continue, nonetheless.

Uncertain: SO2 Climate Change Adaption; SO5 Soil, Land & Minerals; SO12 Digital Infrastructure; SO13 Travel & Accessibility; SO17 Social Deprivation; SO18 Economy & Employment SO20 and Education & Skills

For the remaining objectives, more information is required to determine the effects.

Selected / Rejected for allocation	<p>The proposal for the site is for 300-400 (net) dwellings. Given the constraints identified within the evidence base and SA it is considered that the site would only be appropriate for up to 150 (net) dwellings in the western part of the site and has been proposed for allocation on this basis.</p> <p>The 2023 Landscape Sensitivity Assessment states that the site is moderately to highly sensitive to development due to its prominent location and topography providing far reaching views northwards towards the Pevensey Levels SSSI, SAC and Ramsar site and other rural locations north of the site. It is considered that landscape impacts in the central and eastern portions of the site are substantial and that it would not be appropriate to deliver housing in this part of the site.</p> <p>It is considered possible that a suitable access to the western part of the site, at the junction between Peelings Lane and St John's Drive, adjacent to the recent new development is achievable.</p>
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Answer to Question 85b) - Reg. 18 Wealden Local Plan consultation 2024

Below is a critique of the full sustainability appraisal for the allocated site WES7, Land at Peelings Lane, Westham that indicates that development of this site is unsustainable and concludes that this site should not be considered as suitable for an allocation.

SA Page	Objective	Bullet point	SA Commentary	Daines Comments
162	SO1	2	The site is 32.49ha in size.....	Although the site offered for development totals 32.49 ha, that considered suitable for development by the Council is the western part totalling 6.8 ha. It is this area and location that should be assessed for suitability in this SA, not the 32.49ha site

162	SO1	4	The nearest bus stop is approx. 100m from the site on Peelings Lane and provides a frequent and regular bus service to the larger settlements of Eastbourne and Hailsham	Frequent and regular is too positive, buses to Eastbourne are approximately hourly, but there are only two buses a day to Hailsham. There are no services to either Eastbourne or Hailsham on a Sunday.
162	SO1	7	The site complies with the overall Spatial Strategy for the district as it is located within a sustainable settlement and within close proximity to sustainable transport.	<p>Within a sustainable settlement is inaccurate - this proposed allocation is outside the current settlement.</p> <p>It is not in close proximity to the rail service, but 1,270m away.</p>
162	SO1	5	The site is located approximately 300m from the nearest train station in Westham	The closest point from the 32ha site to the station is 400m measured in a straight line, but walking or driving from this closest point to the station is 640m. However, the distance to the station from the potential 6.8ha site access point on Peelings Lane is 1,120m. As the site extends a further 300m northwards, the walking/driving distance from the centre of the site to the station is 1,270m, which is well beyond the maximum 400m recommended by Sustrans and the 800m by CIHT.

162	SO1	7	The site complies with the overall Spatial Strategy for the district as it is located within a sustainable settlement and within close proximity to sustainable transport.	<p>Within a sustainable settlement is inaccurate - this allocation is outside the current settlement.</p> <p>It is not in close proximity to the rail service, but 1,270m away.</p>
163	SO1	2	All development will result in an increase in greenhouse gas emissions and therefore a minor negative impact is expected overall.	The short-term impact on climate change has been assessed as minor negative. This cannot be correct if the carbon impact from the construction phase is considered (say 50t/house, plus that for the site works – roads, drainage etc.). That this hasn't been considered is a major omission. As we need to get to net zero, any measures that results in an increase in emissions cannot be considered a minor negative – this should be scored as a major negative.
164	SO3	7	The promoter has indicated as part of a vision document that development would.....	This is one of several references to the promoter's vision document. Should not this document be made available to the public if it is being relied upon in this SA? Unless there is a site-specific policy requiring provision of whatever measures are in the promoter's vision, which there is not, then these measures cannot be considered in this appraisal.
164	SO3	8	The promotor has also indicated that a	Unless a policy requires this site to have a wetlands area, that the promotor has indicated one will be provided cannot be considered to

			wetlands area would be created.....	be deliverable. The proposed wetlands is in the part of the site that is not considered developable so unlikely to be provided.
164	SO3	10	Given that the site is at risk of flooding from multiple sources, but that suitable mitigation has been demonstrated via proposals.....	These promotor proposals should not be given any weight as they have no legal standing. Any identified flood risk should be managed by policies. Flood risk should currently be assessed as uncertain, not, not significant.
165	SO4	2	A watercourse (Martins Ditch and Gut) form the northern boundary of the site.	Whereas the watercourse forms part of the northern boundary of the 32ha site, to the west, it runs through the middle of the two fields of the 6.8ha site proposed in this draft plan for development.
165	SO4	4	The promotor has indicated that a three stage system to ensure there are no adverse impacts to the local water system and Pevensey Levels	As for the comments above, whatever this promotor has indicated should have no bearing on the sustainability appraisal of this site given that the promotor's indications have no standing. The Pevensey Levels are afforded statutory protection and it would be unlawful not to take measures to avoid an adverse impact. There is no evidence that three, or any number of SuDS features, will avoid an adverse effect to the Pevensey Levels.
165	SO4	8 and development would potentially	The conclusion of no significant effect for SO4 appears to be relying on measures offered by the site promotor. As stated above, the

			<p>impact upon its [the watercourse] quality, the promotor has indicated that this will be mitigated and therefore there is no significant effect on this SA Objective</p>	<p>delivery of these measures cannot be guaranteed meaning that they should form no part of this SA. Thus, a more accurate conclusion for this objective would be uncertain at best or potentially a minor negative.</p>
166	S07	1	<p>The majority of the site (western half) is within an area classified as being darker in CPRE's light pollution mapping</p>	<p>As it is only the two westernmost fields being assessed as suitable for development, then the entirety of this development area is within the dark skies area. Introduction of housing into a darker skies area would degrade the degree of darkness immediately adjacent to the Levels</p>
166	S07	3	<p>Westham lies in very close proximity to Eastbourne</p>	<p>It is agreed that with Eastbourne's growth, it is now very close to Westham but Eastbourne town centre is 8km from this site, which cannot be considered as close proximity. However, it is questioned why this proximity comment has any relevance to S07.</p>
166	S07	3	<p>Westham is classed as a local service centre.....</p>	<p>No relevance to S07</p>
166	S07	4	<p>The site is approximately 500m</p>	<p>Factually incorrect, but no relevance to S07</p>

from the nearest train station....

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|-----|-----|---|---|--|
| 167 | S07 | 2 | there is likely to be a significant increase in traffic and congestion on the road network although this may be mitigated by some degree through the provision of services and facilities on the site..... | Although this site is being taken forward for 150 houses, not the 400 proposed, in the locality this will still result in a large increase in traffic. Whatever services and facilities have been offered by the promoter, any benefit cannot be taken unless these services and facilities are required by a site-specific policy. As there is no policy, no benefit can be taken forward into this appraisal. Thus, no decrease in traffic can be taken. |
| 167 | S07 | 3 | Transport surveys and modelling will be required to ascertain the impact on the road network and identify mitigation measures. | The Core Strategy allocated 650 houses to Stone Cross and ESCC identified that mitigation measures would be necessary at the Stone Cross crossroads. However, despite these 650 houses (and hundreds more) having all been constructed and occupied, ESCC has yet to identify and implement any mitigation at the crossroads. Furthermore, construction of an additional 500 houses is underway with a further 362 having received permission. This draft plan is proposing a further 448 houses for the parish. |

Whatever mitigation solution would have been suitable for the Core Strategy 650 houses, is probably not suitable for the additional 862

houses under construction or with permission. Clearly, should the proposed 349 allocation in this draft plan together with the 99 windfalls come forward, this will total an additional 1,310 houses on top of the Core strategy 650.

The commentary talks about “identify mitigation measures” but it is considered that the identification of measures is totally inadequate – what is needed is the implementation of the measures. Implementation requires measures to be identified, to be designed, to be funded and then delivered – it is only then that the pollution from the congestion will be mitigated. Given the complete lack of implementation of the mitigation measures identified for the Core Strategy development, provides no confidence that any mitigation needed for the growth in this plan will be forthcoming.

Furthermore, the Core Strategy development has resulted in long westbound queues for several years on Dittons Road at the A22 Golden Jubilee Way roundabout in the morning peak. This issue was not identified in the Core Strategy and although a "solution" has now been identified by ESCC, when it will be implemented is unknown as funding has not been obtained. Doubt remains whether this solution (traffic signal-controlled cross-roads in lieu of a roundabout) will be effective given the impact on the adjacent A27 roundabout. But whether this solution will also be able to

accommodate the large increase in additional traffic arising from the post Core Strategy development is also unknown.

Thus, given the experience to date regarding the provision of infrastructure, the proposed minor negative score for this site should be changed to a major negative.

S07	Omission from SA	The surface water from the site may potentially be polluted with garden chemicals (herbicides, pesticides, fertilisers, timber treatments, etc.) automotive chemicals (petrol, diesel, anti-freeze, brake fluid, brake dust (pads and discs/drums) cleaning chemicals, protection chemicals, etc.) plus micro-plastics and “forever” chemicals (PFAS) etc. Clearly, these pollutants are likely to cause a significant effect to the conservation objectives of the Pevensey Levels SAC and Ramsar site meaning that before this site can be included within the plan, an appropriate assessment will be required. Previous assessments by the Council have failed to contain complete, precise and definitive findings and conclusions to ensure that there is no reasonable scientific doubt as to the effects of the proposed project. We would expect that should WES7 be in the Reg. 19 version of the plan, it will contain a positive appropriate assessment that complies with the requirements of the Habitats Regulations needed before this site can be considered for inclusion.
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167	S08	1 & 2 The mature hedgerows and trees	It appears that there is no intention or requirement to retain the internal hedgerows and trees on the mature hedgerow running north
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within the site and along its boundaries.....
 Development would need to seek to retain and enhance the existing hedgerows and trees on the boundaries to maintain and enhance the green infrastructure network

south through the site, the loss of which would not enhance the green infrastructure network. This would be a permanent major negative.

168	SO8	1	Any development would need to provide a minimum 20% biodiversity net gain (BNG) on site.....	Whereas the increase to 20% BNG is welcomed, the government has stated that any increase in the statutory minimum 10% BNG would need to be fully justified. No justification for the 20% has been provided, meaning that there is great doubt whether this measure can be implemented.
168	SO8	2	The promoter for the site has indicated a significant range of measures to provide and enhance green and blue infrastructure....	As outlined above, mere stated intentions by a site promoter cannot be given any weight as there is no mechanism short of a specific policy, which has not been provided, to guarantee that the enhancements will be provided. Furthermore, the enhancements were part of the development plan for the entire 32ha site, it must be very doubtful whether the enhancements will be offered for the much smaller 6ha site that Wealden consider suitable for development.

168	S08	4however, over the longer term major positive effects are expected as green and blue infrastructure is enhanced	As the enhancement currently is unable to be required or enforced, any resulting benefits cannot be considered as weighing in favour of this site as an allocation. At best, the effect of this site on S08 cannot be considered as a major positive but at best, it can only be uncertain.
168	S09	5	Any development would need to provide a minimum 20% biodiversity net gain (BNG) on site.....	The government has stated that any increase in the statutory minimum 10% BNG would need to be fully justified. No justification for the 20% has been provided meaning that there is great doubt whether this measure can be implemented.
168	S09	6	The site is located partially within the Pevensy Levels BOA. Development could adversely impact on the objectives of the BOA	Agreed. But quite how this potentially negative impact can support a score of a major positive is not explained or justified. At best, the assessment should be uncertain.
168	S09	7and ensure mitigation measures are implemented to avoid harm	Without identifying the feasibility, practicality and effectiveness of these unknown mitigation measures, the major positive assessment is clearly wrong. It should be uncertain at best.
169	S09	1	The promoter has indicated as part of	There are two major issues with this assessment:

the vision document that assuming the grassland in any new country park are managed a BNG of over 20% could easily be achieved across the site.

1. A country park appears to have been offered by the promoter as part of the development of the 32ha site. That Wealden propose to limit development to just 6ha , this casts great doubt on whether the country park will still be provided for this much reduced area of development.
2. No weight should be afforded to a promoter's vision document unless it is proposed to include the measures offered as part of the policy for this site. As there is no site-specific policy, the contents of the vision document should be ignored in this appraisal.

169	SO9	2	Therefore, a minor negative effect is likely in the short to medium term as the site is developed, however, over the longer term major positive effects are expected.....	These major positive effects are very unlikely to occur for the reasons given above and the effect on SO9 from developing this 6ha site is most likely to remain as minor negative.
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169	SO10	1	The 2023 Landscape Sensitivity Assessment states that the site landscape is moderately to highly sensitive It is	It is agreed that landscape impacts of developing the central and eastern portions of the site would be severe and inappropriate. However, this also applies to two western most fields of WES 7 which also cannot accommodate development without substantial harm to the landscape.
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considered that landscape impacts in the central and eastern portions of the site are substantial and it would not be appropriate to deliver housing in this part of the site. There are two fields in the south western portion of the site that are well screened by existing landscape features and the visual impact of the development would be more limited in these locations.

There are three local appeal decisions that are relevant to this site viz:

APP/C1435/A/00/1045611 decision 11 September 2000 (the 2000 appeal)

APP/C1435/A/14/2228090 decision 12 January 2015 (the 2015 appeal)

APP/C1435/W/22/3304251 decision 15 May 2023 (the 2023 appeal)

The 2000 appeal

For the 2000 appeal, that being for or a single garage at 2 Romans Way, which is opposite the south western corner of this proposed allocation, the inspector identified the main issue as the effect of the proposed development upon the rural character and appearance of Peelings Lane.

The inspector stated (paragraph 4) that Peelings Lane effectively marks the northern edge of Westham.

In paragraph 6, the inspector says "The southern edge of Peelings Lane contains a number of mature trees and shrubs which to a large extent form a densely vegetated green boundary which screen the housing area to the south. This helps to create the clear demarcation between "town" and "country" which is one of the functions of town and village development boundaries."

Development of WES7 would be north of this demarcation thus losing the benefit from the screening of the urban area to the south.

In paragraph 7, the 2000 inspector explicitly criticises the inspector who in 1995 had granted permission for a garage immediately adjoining the 2000 appeal site saying "This demarcation has, however, been blurred in places by development encroaching onto the south side of the lane. I find one example of this blurring encroachment is the new garage at 1 Romans Way, which in my opinion has harmed the rural character and appearance of Peelings Lane

That the 2000 appeal inspector considered one garage would harm the rural character of Peelings Lane, 150 houses could be considered to decimate the rural character.

In paragraph 8, the inspector starts by stating "I consider that the garage now proposed would only compound this harm to the rural character and appearance of Peelings Lane."

Clearly, the necessary widening works to permit two-way traffic plus the access to the site and a footpath on this part of Peelings Lane will considerably harm the rural character and appearance of Peelings Lane

In paragraph 10 of the 2000 appeal, the inspector concluded

I have concluded that the proposed garage would harm the character and appearance of Peelings Lane contrary to the relevant policies in the development plan.

Thus, this appeal for a single garage at the bottom of the garden of 2 Romans way was dismissed because of the harm to the rural character and appearance of Peelings Lane, yet the current proposal is to allow the construction of 150 dwellings to the far more open area north of Peelings Lane. If one garage was considered to cause harm, clearly, 150 houses in an area that is far more visible, cannot be permitted.

The 2015 appeal

In the 2015 appeal, which was for a site which forms the southern part of the westernmost field in this proposed allocation, the inspector states in paragraph 9,

The character of Peelings Lane changes markedly in the vicinity of the appeal site. To the west of the site, where Ketcham Close faces Peelings Lane, it has a generally suburban character. East of Ketcham Close it is much more rural in character.

The inspector concludes this paragraph with:

Nevertheless, the vegetated banks on either side of the lane and the

mature trees on the northern side give this section of the lane a predominantly rural feel.

In paragraph 10, the inspector states:

I consider that when the topography, vegetation and development pattern are considered as a whole, Peelings Lane forms a distinct visual edge to the built-up area.

In the succeeding paragraph, the inspector continues

The appeal scheme would result in a loss of the landscape character of the appeal site through the introduction of roads and housing in what is currently an open field. To my mind it would also have a wider visual impact, particularly as seen from Peelings Lane and from the public footpath which crosses the western end of the site. The new houses would be to the north of the existing visual edge formed by Peelings Lane, extending the built-up area into a currently undeveloped tract of countryside. Due to the irregular shape of the site the houses in the north east corner, furthest from the lane, would be particularly prominent in the wider landscape.

Given that for this 2015 appeal site – the north east corner extends a maximum of 80m north of Peelings Lane, whilst the proposed allocation site WES7 extends 275m north, the concern expressed by the 2015 inspector of development being particularly prominent in the wider landscape would be considerably magnified by this significantly larger proposed allocation site.

At paragraph 12, the inspector deals with the impact of the adjacent Ketcham Close and considers that this north of Peelings Lane development provides no support to the appeal scheme. He considers the two schemes are not comparable as the appeal site is covers a larger area and extends considerably further from Peelings Lane. However, this proposed allocation WES7 is many times larger than the 2015 appeal site and extends over three times further from Peelings Lane.

In paragraph 13, the inspector accepts that the low-density appeal scheme together with areas of open space and planting could partially mitigate the visual impact of the scheme but considers that this would not overcome his concerns. He concluded that the appeal site would be intrusive within the landscape and would not comply with policies in the local plan.

Obviously, with this proposed allocation WES7 site extending considerably further into the countryside north of Peelings Lane, it cannot fail to be considered as highly intrusive within the landscape.

At paragraph 17, the inspector states “

To conclude on the main issue, the proposal is not acceptable because it would be intrusive in the landscape and would thereby conflict with CSLP Policy WCS9.

The inspector then dismissed the appeal.

The 2023 appeal

Turning to the 2023 appeal for a small development of five dwellings situated on Peelings Lane approximately 250m west of the proposed allocation site WES 7, the relevant issue is the necessary alterations to Peelings Lane and the effect on the character and appearance of the area including the Low Weald landscape.

The main part of the development containing four of the proposed five dwellings is a small field behind the dwellings on Peelings Lane and immediately west of the dwellings on Hankham Hall Road. Furthermore, there are some dwellings to the north making this small field largely enclosed on three sides by built form. However, in paragraph 6 of his decision, the inspector states:

This mostly undeveloped part of the site, with field boundary hedges and some trees, retains a strong rural impression. It is indicative of the attractive open, undulating agricultural topography of the Low Weald landscape so makes a positive contribution to this local designation

Clearly, the fields proposed for the 6.8ha allocation site provide a strong rural impression as neither has any built form around them unlike the 2023 appeal site. Development of WES7 would provide a highly negative contribution and be completely alien to the undulating agricultural topography of the Low Weald landscape and would thus make a negative contribution to the local designation.

In paragraph 7 of the 2023 appeal, the inspector affirms:

This [development] would be out of keeping with the prevailing pattern of residential development in the lane and significantly erode the spaciousness of this pocket of countryside.

With no existing development to the north of Peelings Lane in the vicinity of the proposed allocation site, any development of this site would be well out of keeping with the prevailing pattern of residential development in the lane and significantly erode the spaciousness of the countryside.

In paragraph 10, the inspector turns to the character of Peelings Lane, which despite the large modern housing estate immediately to the south, he considers:

It is largely unspoilt with an attractive, distinctly low-key rural feel and tranquil sense of place. It therefore contributes to a lattice of narrow country lanes, away from main roads and intrusive or extensive development. These are characteristic of the Low Weald landscape.

This is an almost identical situation to that of Peelings Lane at the proposed allocation site for WES7.

In paragraph 11, the inspector takes issue with the impact on the lane of the proposed development:

However, the highly engineered layout and geometry of the proposed vehicular access, including two-way carriageway, pavements, kerbs and road markings would be overtly urban in form. It would also extend a long way back from the lane into the heart of the site.

This situation would again be identical for the access required by the potential allocation site for 150 houses onto Peelings Lane.

The inspector then contrasts the proposed alterations:

This stark feature would be at odds with the mainly short, individual narrow private driveways that line the lane, and jar in this street scene, appreciably undermining the rural integrity of the lane.

With the street scene at the potential allocation site WES7 being wholly rural with unbroken grass verges to both sides of Peelings Lane, the impact of the proposed site access would be alien, highly intrusive and totally undermine the rural integrity of the lane.

In paragraph 12, the inspector looks at the proposed 22m long and 1m deep passing bay proposed on Peelings Lane and the introduction of a 1.5m wide footpath. The inspector opines that:

Both of these features would, therefore, remove a substantial and significant length of the verge. This would interrupt its linear continuity and these large scars in this streetscene would unduly erode and detract from the verdant, rural nature of the lane.

The access for the proposed allocation site, even should this be placed at the extreme western end of the site, would involve widening Peelings Lane over short distance to permit two-way traffic and the introduction of a footpath. The impact of these works would be far higher than those which the 2023 appeal inspector found unacceptable immediately to the west.

It should be noted that in 2023, as now, the Council cannot demonstrate a five-year supply of housing land and the 2023 appeal inspector recognised that reduced weight should be given to the conflicts within the appeal proposal with the development plan. However, the inspector concluded:

Nonetheless, by virtue of the sites location in the countryside and its intended development, including alterations to the lane, the adverse impacts of the proposal would cause unacceptable harm to the character and appearance of the surrounding area, including the Low Wealden landscape.
(paragraph 22)

Whilst in paragraph 23, the inspector states:

.... the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework taken as a whole.

And the appeal was dismissed.

Although this 2023 appeal was only for five (net four) dwellings, its impact on the countryside and the lane was deemed sufficiently adverse for the appeal to be dismissed. Yet the proposed allocation site WES7 is for 150 dwellings over a far larger, more prominent and visible area of the countryside where its adverse impact will be considerably increased.

Clearly, this proposed allocation site is not suitable for development given resulting harm to the landscape and the surrounding area.

Other landscape matters

Although Wealden's SA commentary considers these two fields are suitable for development as they are well screened by existing landscape features, a site visit demonstrates that this is not the case.

The westernmost of the two fields is highly visible from Peelings Lane where currently, long distance views to the north are available

across the fields falling to the Pevensey Levels, across the Levels themselves and to the landscape rising from the northern and eastern side of the Levels. Development of this field would obliterate these long views.

For the second of the two fields, long distance views are not available other than through the vegetation to the south of the field and north of Peelings Lane. This is quite permeable in the winter albeit less so in summer. However, any built form would be readily seen from Peelings Lane, the observation platform at the North Tower of Pevensey Castle and much of the higher ground within the Roman walls.

Furthermore, two footpaths run approximately north-south each side of the proposed allocation site. Footpath Westham 30 to the west of the site provides views across the site to Pevensey Castle which would be blocked by development. To the east, views of the developed site would be seen from footpath Westham 5c. Most of the developed area of Westham is currently hidden from these footpaths and longer views from the Pevensey Levels by the mature vegetation along Peelings Lane. Thus, development of this allocation would be both intrusive and highly visible in the landscape.

Development would also be visible from around a 1,200m length of the Pevensey bypass and for a considerable length of the 1066 walk along the Pevensey Haven.

The Ninfield appeal APP/C1435/W/23/3331769. Decision 15 April 2024

Although this appeal site is around 10km north east of the proposed allocation WES7 and is situated on the edge of the village of Ninfield, the location of the site on the edge of the village and nature of the countryside has similarities with WES7.

The main issue identified by the inspector was:

The main issues are whether the site is a suitable location for housing with particular regard to the effect of the proposed development on the character and appearance of the area and development plan policy.

The 4ha site is an approximately square grass field bounded to the south by the B2204 Catsfield Road, to the west by the gardens of

houses fronting the High Street with the other two sides of the boundary being largely wooded.

In paragraph 4, the inspector stated:

.....the undeveloped natural appearance of the site makes a positive contribution to the surrounding rural character.

The inspector continued:

There is a clear, albeit somewhat distant, view to the site from part of the Public Right of Way Ninfield 21, with the existing village buildings behind. On the west side there are a limited number of driveways. There is also an industrial building to the south of the appeal site.

Thus, the inspector considered that this Ninfield site was in the countryside and contributed to the rural character. The site appears to be more enclosed than WES7 and therefore the development would not be so visible as the Westham proposal.

In paragraph 5, the inspector said:

Catsfield Road is a rural, green lane. In the vicinity of the appeal site, Catsfield Road is characterised by steep banks with trees and hedges on both sides which make a valuable contribution to this rural character. On the west side there are a limited number of driveways. There is also an industrial building to the south of the appeal site. However, due to their rural surroundings these appear as sporadic development along a traditional green country lane.

Whereas there are some similarities between Catsfield Road and Peelings Lane in terms of their rural character, Catsfield Road is nevertheless more urbanised than Peelings Lane.

In discussing the site access in paragraph 7, the inspector considered:

There would therefore be a clear and extended break in the traditional boundary to provide this residential road. The proposed houses would be set back from the road, however their rooftops would be visible, albeit as there is no footpath

along Catsfield Road any views would be transitory and glimpsed.

The WES7 development would be far more visible from the shared surface that is Peelings Lane when compared to the lack of passing pedestrian access offered by the Ninfield proposal.

In paragraph 11, the inspector stated:

Some lighting would be required to this development. A condition could limit external light levels in public areas which would minimise light spillage in accordance with policy EN29 of the LP. However, it would be unreasonable to control lighting within individual homes. Consequently, and noting the location of the houses away from the existing roads, there would nevertheless be some glow from properties and low level lighting and this would contribute to the urban character of the proposed development.

This situation would also prevail at WES7 with lighting from the development contributing to its urban character.

At paragraph 12, the inspector considered:

The proposed development would introduce housing development to this site with the associated roads, parking, domestic gardens and comings and goings. This would remove the open, green characteristics described above and there would be serious harm to the positive rural characteristics of the site in this regard.

..

Furthermore, the introduction of the access road, regrading and required open visibility splays would be a clearly urban feature which would harmfully disrupt the rural character of Catsfield Road and would result in the clear extension of urban development away from the village along this rural road. Consequently, overall, the proposed development would result in substantial harm to the character and appearance of the area.

In the assessment of the planning balance, the inspector took into account that the Council could not demonstrate a 4 or 5 year supply of deliverable housing sites and afforded significant weight to the social and economic benefits arising from the development. However, the inspector still found that the environmental harm

resulting from the development would outweigh the benefits, concluding in paragraph 39:

Consequently, the harm I have identified would have a serious harmful effect on the character and appearance of the area, which would lead me to conclude that these substantial adverse effects attract greater weight that significantly and demonstrably outweighs the benefits set out above.

The inspector then dismissed the appeal.

It is considered that site WES7 would experience greater harm to the character and appearance than that at the Ninfield site due to the greater size of the development, the greater openness of the site with views from the Pevensey Levels and adjacent public footpaths, and the much larger footfall along Peelings Lane. Thus, the reasons for the dismissal of the Ninfield appeal would be magnified for WES7 making this site unsuitable for an allocation.

Conclusion

Clearly, the sustainability appraisal considerably under predicts the harmful impact arising resulting from development of site WES7 and its effect on SO10 should more appropriately be assessed as a major negative.

169	SO10	2	<p>Given the above reasons, it is considered the effects on this SA Objective are minor negative. However, development within the SW parts of the site would be more enclosed and capable of accommodating development.</p>	<p>The minor negative assessment for the 32ha site is too positive. As well as the issues outlined above, the 32ha site would be highly visible in the landscape, drastically urbanising the current rural character. This new urban area would be highly visible with long distant views from much of the Pevensey Levels and also from several viewpoints at Pevensey Castle. For this 32ha site, the effects on SO10 would be a major negative.</p> <p>The 6ha site would also be intrusive in the countryside, with the built form extending extensively northwards beyond the natural boundary of the urban extent of Westham currently limited by Peelings Lane. Thus, the effect of developing this 6ha site on the landscape would be major negative.</p> <p>Thus, the effect of developing the 6ha site on SO10, would be highly negative</p>
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170	SO11	2	Given the large number of heritage assets in close proximity to the site, including Pevensey Castle, the effect is expected to be minor negative but this could be reduced through suitable mitigation measures.	It is considered that the effect of developing the 32 ha site would have a high impact on the adjacent heritage assets. The current assessment of minor negative is considered too low as development would provide substantial harm to the setting of the scheduled ancient monument of Pevensey Castle. The assessment appears to be taking the benefit arising from suitable mitigation measures. But these measures have not been identified and therefore it is not possible to assess whether or not they could be implemented and whether they would be effective. Without this information, no benefit from unknown mitigation can be considered, resulting in a minor negative effect
170	SO13	1	The site may be able to achieve a vehicular access at the south western corner of the site, however, this would require the widening of Peelings Lane to allow for two lane traffic and pedestrian footpaths.	As indicated above, the inspector in appeal ref. APP/C1435/W/22/3304251 (the 2023 appeal) considered that a 22m long by 1m wide layby together with a footpath and the vehicle access would be overtly urban in form and would have an unacceptably adverse effect on the rural nature of Peelings Lane - this formed one reason for the dismissal of the appeal. Clearly, widening Peelings Lane over a short length to permit two-way traffic from WES7, provide the vehicle access to the site, plus the addition of a footpath with a kerb will urbanise this section of the lane to a greater degree than proposed in the dismissed appeal scheme.

170	SO13	2&3	Due to the narrow form of Peelings Lane and its steep embankments, pedestrian footpaths could only be provided towards the south west.	It is accepted that a footpath can be provided at the south west corner of the site but together with the necessary widening of Peelings Lane, but this will adversely impact the rural nature of the lane causing unacceptable harm.
170	SO13	4	Westham lies in very close proximity to Eastbourne.....	It is accepted that suburbs of Eastbourne now lie relatively close to Westham but the nearest facilities, being those at the Langney Shopping Centre, are over 3.5 km from the site entrance of this proposed allocation. It is not considered that 3.5 km can be fairly described as very close proximity.
171	SO13	1	The nearest bus stop and provides a frequent and regular bus service to the larger settlements of Eastbourne and Hailsham	The bus service to the east doesn't start until 10:00 in the morning making it unsuitable for accessing work in Bexhill or Hastings. The only direct bus service to Hailsham from the site is two busses on Saturdays, there is no service to Hailsham during the week. There is no bus service on Sundays.

171	SO13	2	The site is located approximately 500m from the nearest train station in Westham	The site entrance for the two fields proposed for this allocation is 960m from the railway station. The furthest extent of the site from the entrance is a further 400m. The claimed 500m is the straight-line distance from the access point on Peelings Lane at the Castle Farm buildings but this part of the site is not considered suitable as an allocation and it will not be the site access.
171	SO13	3	Public right of way (Westham 5b) runs north to south through the eastern part of the site	It is public right of way Westham 5c (not 5b) that runs north to south through the eastern part of the site – that being the part that is considered unsuitable by the Council for development.
171	SO13	5	Whilst the site is located adjacent sustainable public transport	The site is served by busses to Eastbourne, but not Hailsham (apart from two on Saturdays). The site is beyond the recommended maximum 800m walking distance to the railway station.
171	SO14	1&2	The proposed development of up to 400 (net) dwellings....	This site is deemed suitable for up to 150 dwellings indicating that the major positive score for providing 400 dwellings is not appropriate for the reduced quantity.

171	SO15	1	The nearest health services are at the Westham Surgery, approx. 350m to the south east of the site.	The Westham Surgery, which is open just three mornings/week is 500m from the Castle Farm access onto Peelings Lane. The proposed entire site extends a further 650m from this access point. However, the access point for the part of the site deemed suitable for an allocation is 1,150m from the surgery, with the site extending a further 350m beyond this point.
171	SO15	2	...has identified significant issues with GP surgery capacity within Westham Parish.	Agreed, and an increase in population can only exacerbate this issue for which the health authority currently has no solution.
171	SO15	3	The Wealden Open Space Study 2022 concludes that there is not a deficit of open space within Westham Parish.	This is a very surprising statement which is not borne out by the information provided in the open space study. For natural and semi-natural green space, there is 4.48ha in Westham against a requirement of 14.64ha, resulting in a shortfall of 10.16ha. For amenity greenspace, 0.9ha is available against a requirement of 4.29ha, resulting in a shortfall of 3.39ha. Clearly, the conclusion opposite is wrong and there exists a large shortfall in open space in Westham Parish.

172	SO15	1	The Wealden Playing Pitch and Outdoor sports assessment identifies that there is no deficiency in provision of sports pitches within the Parish	This statement is very surprising and cannot be found in the latest 2022 playing pitch and outdoor sports assessment. This document records that Pevensey and Westham FC export their demand for playing pitches to Eastbourne playing on pitches at Eastbourne Academy, Eastbourne College and Eastbourne Sports Park. The club responded to the study author's saying that they need further training pitches, notably 3G pitches (the only available pitches in the District being at Wallsend Recreation Ground are frequently waterlogged during the season.)
172	SO15	3	Given the size of the proposed development, it is considered there would be minor positive effects on this SA Objective through contributions to health and wellbeing enhancements	<p>The submitted development site is 32.49ha for up to 400 houses, but the Council considers that only 6.8ha at the western end of this site is suitable for development. It must be doubtful whether the site owner will provide any more than the 6.8ha identified for development meaning that the land proposed for green/blue infrastructure may not come forward. <u>March 2026 Note</u>: An application has been submitted for 150 houses on the western 6.8Ha portion of the site. There is no provision for green and blue infrastructure.</p> <p>Thus, the correct score at this stage against this objective cannot be any more than uncertain.</p>
172	SO16	1	The proposals have indicated that	It is considered that the provision of the facilities related to the 300-400 dwelling development across the whole site 1099/3360.

community facilities such as allotments will be provided on site. Furthermore, there will be significant open space provision and the implementation of walkable and cyclable neighbourhoods.

However, only around 20% of this site is deemed suitable for the provision of 150 dwellings meaning that it is likely that the promoted facilities may not be provided for this smaller site. Possibly, the open space was being provided on the land within flood zone 2 & 3, but as there is a much-reduced area within the two fields identified as suitable, this open space may not be provided. As indicated above, without a site-specific policy requiring facilities such as allotments and as no such policy currently exists, no benefit can accrue to such proposals. Thus, at present, the effects on this SA Objective can only be uncertain. 2026 Note The current application makes no provision for allotments.

172 SO16 4 Given the above, the effects on this SA Objective are expected to be minor positive

Given the above, the effects on this SA Objective at this stage can only be uncertain.

172 SO17 1 ...there will be the potential for significant provision of affordable housing, custom and self-build homes and play-space

The text underlying the social deprivation objective states: "To tackle social deprivation by improving access to essential services and facilities, supporting diversity and equality for all." It is not considered that the provision of more homes and play-space contributions will tackle social deprivation. Wealden generally is not socially deprived ranking in 2019, 254 out of 317 LPAs. The three

			contributions as well which will contribute to quality-of-life improvements.	Wealden wards that are socially deprived are in Hailsham and it is very unlikely that this Peelings Lane development will impact those wards. The assessment appears to consider that an improvement in quality of life equals a reduction in social deprivation – it does not.
172	SO17	2	Given the above, the effects on this SA Objective are expected to be minor positive	Given the above, the effects on this SA Objective certainly cannot be considered minor positive and are either uncertain or no significant effect.
172	SO18	2it is considered the site would have no significant effect....	Agreed
172	SO19	2	The site is in close proximity to the services and facilities in Hailsham, together with public transport, so future residents would have good	Hailsham town centre is over 9km from the site entrance, which cannot be considered as close proximity. There is no direct bus service between the site and Hailsham apart from two busses on Saturdays. Thus, any access to Hailsham would be by car.

access to the town
centre

172	SO20	2	The nearest nursery and primary school is the Pevensey & Westham Church of England School, approximately 350m to the south east of the site.....	The nursery and school are approximately 950m from the site entrance. The 350m appears to be a straight line distance from the east of the submitted site although this part of the site is not deemed suitable for development.
173	SO20	3	Further primary, secondary and college provision is located within Eastbourne approximately 2km to the south west	<p>The closest nursery in Eastbourne is 3.4 km from the site entrance.</p> <p>The closest primary school in Eastbourne is 4.3km from the site entrance.</p> <p>The closes college in Eastbourne is 3.4km from the site entrance.</p> <p>Clearly, the effect of this site on SO 20 is uncertain.</p>

Summary

Putting the Council's sustainability appraisal scores alongside the scores resulting from a consideration of the above points provides this comparison:

Sustainability Objective		Wealden Score	Reviewed Score
SO1	Climate Change Mitigation	minor negative	major negative
SO2	Climate Change Adaption	uncertain	uncertain
SO3	Flood Risk	not significant	minor negative
SO4	Water Resources & Quality	not significant	uncertain
SO5	Soil, Land & Minerals	uncertain	uncertain
SO6	Waste	minor negative	minor negative
SO7	Pollution	minor negative	major negative
SO8	Green & Blue Infrastructure	major positive	uncertain
SO9	Biodiversity	major positive	minor negative
SO10	Landscape & Townscape	minor negative	major negative
SO11	Historic & Cultural Heritage	minor negative	minor negative
SO12	Digital Infrastructure	uncertain	minor negative
SO13	Travel & Accessibility	uncertain	uncertain
SO14	Housing	major positive	major positive
SO15	Health & Wellbeing	minor positive	uncertain
SO16	Quality of Life & Place	minor positive	uncertain
SO17	Social Deprivation	uncertain	uncertain
SO18	Economy & Employment	not significant	not significant
SO19	Town & Village Centres	not significant	not significant
SO20	Education & Skills	uncertain	uncertain

Whereas the Council considered that their SA scores above indicated that there were no show-stoppers for this site and the proposed development of the 6.8ha western part was sustainable, this is not borne out by the assessment undertaken using the information provided above. Clearly, proposed allocation WES7 is considerably less sustainable than considered by the Sustainability Appraisal supporting the draft Reg. 18 Local Plan.

It is considered that the harm to the landscape is the most serious constraint against development. With three very adjacent appeals for small developments dismissed largely due to landscape harm, the imposition of a very large development in the same landscape will inevitably result in a very serious harm. Furthermore, the April 2024 appeal dismissal of the more visually enclosed site on the edge of Ninfield suggests that this far more visually exposed site in Westham is unsustainable and thus unsuitable for development.

WES7 is immediately adjacent to the Pevensey Levels SAC, Ramsar site and SSSI and is one of more than 50% of the sites allocated for development in this draft plan that lie within the hydrological catchment of the Pevensey levels. Every one of these sites, including WES7, will require a positive appropriate assessment before they could be considered suitable for inclusion in the plan.

From the information set out above, it is clear that WES7 is not sustainable and therefore this allocation should be removed from the plan.

End of the WES 7 response to the 2024 consultation.

Note (compiled March 2026) on WES 7 sustainability appraisal

If the sustainability appraisal impact on each of the sustainability objectives was scored as follows:

Major positive	4
Minor positive	2
Not significant	0
Uncertain	-1
Minor negative	-2
Major negative	-4

Then Wealden's assessment of the impact of this WES 7 development against the summed total of the 20 sustainability objectives would score 0.

It would be reasonable to consider that any summation that does not result in a positive score should mean that a site lacks sustainability and therefore should not be considered suitable for an allocation. Scoring zero should mean that the site's suitability is highly marginal at best.

But when the revised (i.e. corrected!) assessment score is -27, it is very clear that this site WES 7 is very unsustainable, totally unsuited to be developed and should not be an allocation.

Despite the submission of the WES 7 critique to Wealden in May 2024, the current sustainability appraisal for this site contained in the Part 3: Strategic Site Assessments Reg.18(2) still contains numerous errors. For example, despite Wealden concluding that only a small part of the overall site is suitable for development, their subsequent assessment takes the benefits from developing the entire site. Clearly, there cannot be any benefit from a country park in the sustainability objective for green and blue infrastructure when this proposed park is in the area considered unsuitable for development. This point has been confirmed by the current planning application seeking approval for housing in the area identified by Wealden as suitable for development. However, the application does not offer a country park, allotments, wetlands, bridleways etc. for which Wealden has assessed a benefit.

A comparison of Wealden’s Reg.18(1) assessment and their Reg.18(2) assessment is shown below. Clearly, they are reluctant to accept errors.

WESTHAM		Sustainability Objectives																			
Ref. No.	Address	SO1 Climate Change Mitigation	SO2 Climate Change Adaptation	SO3 Flood Risk	SO4 Water Resources	SO5 Soil, Land & Minerals	SO6 Waste & Materials	SO7 Pollution	SO8 Green & Blue Infrastructure	SO9 Biodiversity	SO10 Landscape & Townscape	SO11 Historic & Cultural Heritage	SO12 Digital Infrastructure	SO13 Transport & Accessibility	SO14 Housing	SO15 Health & Wellbeing	SO16 Quality of Life & Place	SO17 Social Inclusion	SO18 Economy & Employment	SO19 Town & Village Centres	SO20 Education & Skills
SELECT	SA Reg 18(1) Results	Orange	Yellow	Grey	Grey	Yellow	Orange	Orange	Green	Green	Orange	Orange	Yellow	Yellow	Green	Green	Green	Yellow	Grey	Grey	Yellow
1099/3360	Land at Peelings Lane, Westham	Orange	Yellow	Yellow	Green	Yellow	Orange	Orange	Green	Green	Orange	Yellow	Yellow	Orange	Green	Yellow	Green	Yellow	Grey	Grey	Green

Source: page 73 Part 3: Strategic Site Assessments Reg.18(2)

Appendix G - Documentation

It can be quite a challenge to locate specific information within the very large quantity of sustainability appraisal documentation. Below is a list (with links) of the 2026 Sustainability Appraisal documents and a link to the 2024 consultation sustainability documents. This is followed by a copy of the contents page for the 2026 documents.

Sustainability Appraisal Documents – 2026 consultation

[Sustainability Appraisal Part 1](#) Contents listed at page 152 below

[Sustainability Appraisal Part 1 Appendices 1 - 4](#) Contents listed at page 153 below

[Sustainability Appraisal Part 2 Parish Site Assessments](#) Contents listed at page 154 below

[Sustainability Appraisal Part 2 Parish Site Assessments Appendix B - Detailed Site Assessments](#) Contents page 155

[Sustainability Appraisal Part 3 Strategic Site Assessments](#). Contents listed at page 156 below

[Spatial Strategy Topic Paper](#) Contents listed at page 157 below

Initial Sustainability Appraisal Documents – 2024 consultation

The Sustainability Appraisal Documents for the 2024 consultation can be found at: [All Local Plan Consultation Information - Wealden District Council](#)

CONTENTS

NON-TECHNICAL SUMMARY

Introduction	5
Why is a Sustainability Appraisal needed?	5
Previous Stages of the SA	5
What is this Report?	7
Method of Assessment	8
Options Considered in the Local Plan	8
Regulation 18 (1) Options	9
Regulation 18 (2) Options	9
Plan Policies	10
Proposed Site Allocations	10
Selection & Rejection of Options	10
Mitigation Measures	11
Monitoring	11
Cumulative Effects	11
Next Steps	12

SA REPORT : PART 1

INTRODUCTION	14
SA METHODOLOGY	18
SPATIAL STRATEGY: REGULATION 18(1)	25
SPATIAL STRATEGY: REGULATION 18(2)	
Spatial Strategy : Spatial Option 1	33
Spatial Strategy : Spatial Option 2	34
Spatial Strategy : Spatial Option 3	36
Spatial Strategy : Spatial Option 4	38
Preferred Spatial Option	40
SITE ASSESSMENTS	41
POLICY ASSESSMENTS	42
CONCLUSIONS & NEXT STEPS	45

Sustainability Appraisal Part 1 Appendices 1 – 4 Reg.18(2) January 2026

APPENDIX 1: SA REGULATIONS	4
APPENDIX 2: SA FRAMEWORK	5
APPENDIX 3: Regulation 18(1) SA Representations	
▶ Statutory Consultees	12
▶ Duty to Co-operate Partners	19
▶ Town & Parish Councils	24
▶ Organisations	31
▶ Local Community	38
APPENDIX 4: Local Plan Policies	41

It should be noted that Appendix 3 does not include all the representations submitted for the 2024 consultation, some e.g. that for WES 7, have not been recorded. Furthermore, some of the Appendix 3 summaries of the representations received are very inaccurate and do not reflect what was submitted. It appears that AI may have been used by Jam Consult Ltd for Appendix 3 without any subsequent check carried out. This raises a concern that AI may have been used elsewhere in the large amount of documentation comprising the Sustainability Appraisal.

A request to Wealden for clarification has been ignored.

Sustainability Appraisal Part 2 Parish Site Summaries Reg.18(2) January 2026

CONTENTS

Introduction	1	16	Isfield	72	
1	Arlington	4	17	Little Horsted	76
2	Berwick	8	18	Maresfield	79
3	Buxted	12	19	Ninfield	83
4	Chalvington With Ripe	16	20	Pevensey	86
5	Chiddingly	19	21	Polegate	90
6	Crowborough	23	22	Rotherfield	94
7	East Hoathly & Halland	29	23	Uckfield	98
8	Fletching	33	24	Wadhurst	102
9	Framfield	36	25	Westham	105
10	Frant	40	26	Willingdon & Jevington	109
11	Hailsham	45	27	Withyham	112
12	Heathfield & Waldron	51			
13	Hellingly	57			
14	Herstmonceux	63			
15	Horam	67			
			Appendix A : Rejected Sites + Sites with Permission	115	
			Appendix B : Detailed Site Assessments (Separate Document)		

Sustainability Appraisal Part 2 Parish Site Assessments Appendix B - Detailed Site Assessments

Contents

Arlington	1	Horam	231
Berwick	19	Isfield	240
Buxted	28	Long Man	247
Chalvington with Ripe	37	Maresfield	250
Chiddingly	40	Mayfield & Five Ashes	260
Crowborough	54	Ninfield	263
East Hoathly & Halland	74	Pevensey	268
Fletching	80	Polegate	271
Framfield	84	Rotherfield	280
Frant	98	Wadhurst	292
Hailsham	119	Westham	295
Heathfield & Waldron	162	Willingdon & Jevington	304
Hellingly	178	Withyham	307
Herstmonceux	220		

NB: The sustainability appraisal for the strategic sites i.e. those >50 houses, are not in this volume but contained in the Part 3 volume below.

Sustainability Appraisal Part 3 Strategic Site Assessments

STRATEGIC SITE ASSESSMENTS: SUMMARY OF RESULTS	4
ARLINGTON	8
CROWBOROUGH	12
EAST HOATHLY WITH HALLAND	15
FRAMFIELD	22
FRANT	31
HAILSHAM	42
HORAM	46
MARESFIELD	50
POLEGATE	54
UCKFIELD	64
WESTHAM	73

Contents – Spatial Strategy Topic Paper

1. Introduction	2
2. Background.....	2
National Policy Context.....	2
Progress of the Wealden Local Plan.....	3
3. Spatial Strategy.....	4
Previous consultations on the Spatial Strategy.....	4
Further options testing	8
Preferred Spatial Option for the 'Focused' Regulation 18 Local Plan	10
4. Housing Supply.....	11
Previous consultations on Housing Supply.....	11
Housing Need Assessment	15
Housing Requirement Testing	16
Site Assessment.....	17
5. Retail Provision and Town Centres	19
Previous consultations on Retail Provision and Town Centres.....	19
Evidence Base Update and Recommendations	20
6. Employment.....	21
Previous consultations on Employment.....	21
Update to the Employment Need Quantum.....	25
Distribution and Type of Employment Space.....	26
7. Conclusion and Next Steps.....	27