

CPRE Sussex, Browning Farm, Blackboys, East Sussex TN22 5HG

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Dear Sir/Madam,

27 March 2026

Re: Response from CPRE Sussex to the Reg 18 Consultation on the Wealden Local Plan to 2042

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

HOUSING TARGET

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

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

The Council at this stage can demonstrate that there is potential capacity to deliver 6,777 (net) dwellings during the new Local Plan period to 2042 Plan, alongside the provision of 6 employment sites, in addition to commitments and windfall sites.

The 'Standard Method' produces an entirely unrealistic housing requirement for Wealden of a total of 24769 new dwellings to be delivered at the rate of 1457 dpa. In light of the constraints the new draft makes provision for a further 16609 new dwellings to be delivered at the rate of 977dpa (policy SS2), **a shortfall of 8160 new dwellings against the target**. The formula that produces this total is, in any case, largely disconnected from real local need.

It is entirely appropriate therefore that the LPA is proposing a lower housing target than that suggested by the Standard Method, though sadly, we are sceptical that the Plan,

with such a target, will either be allowed to proceed to examination by government ministers, or deemed sound by an Inspector at examination as mentioned above.

As the Draft Plan notes, Wealden is one of the largest in the southeast region and is also the largest local planning authority in East Sussex and the majority of Wealden is located within the High Weald National Landscape (53%), and the council have a duty to actively seek to further the conservation and natural beauty of this nationally important historic landscape.

There are two European habitats sites within the administrative boundaries of Wealden District Council that includes the Pevensey Levels Special Area of Conservation (SAC) and Ramsar Site, and the Ashdown Forest SAC and Special Protection Area (SPA) and Wealden District Council as the 'competent authority', must carry out an assessment under the HRA regulations, to test if a project proposal or plan (in this case) could significantly harm the designated features of a European site.

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

As stated in the Draft Local Plan in 'Key Characteristic':

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

market housing that is affordable and results in difficulties for people to get onto the housing ladder, particularly younger people. In addition to high house prices, it is also expensive to rent a property within Wealden, which again goes to affordability, especially for those on lower incomes who are also unable to access market housing.

- In 2021 the census recorded around 91% of the district's housing stock is private sector.
- Availability of water: Wealden District is an area of a serious water stress.

Housing growth as proposed in this draft is likely to make this situation even worse.

According to the Draft Local Plan affordability has significantly deteriorated in Wealden since 1998 and in 2024; the median house price in Wealden was 11.62 times median annual workplace-based earnings (higher than across the Southeast region (9.610 and across England and Wales 97.54)

Paragraph 5.9 of Spatial Strategy states that in line with the statistics, the Council's Local Housing Needs Assessment (LHNA) identified that the district has a significant affordable housing need of 754 dwellings per annum (dpa). However, it is questionable if the requirement of policy HO8 (Affordable Housing) would satisfy this needs whilst affordable housing according this policy will be expected to be provided at a level of 35% of the total number of dwellings.

In paragraph 2.33 Spatial Strategy deals with reduction of emissions and stresses that 'it will also be important to maximise natural processes that can take carbon out of the atmosphere, known as 'carbon sequestration'. Green infrastructure and nature recovery will have a major role to play in this, helping to mitigate the impacts of high temperatures, reduce flood risk, and maintain biodiversity.'

Wealden District is situated within a diverse and distinctive landscape, including some of the most attractive countryside in the country and paragraph 2.36 pointing out at the quality of the landscape as an valuable resource and asset contributing to the district's rural economy, ecosystem services as well as providing opportunities for recreation.

Paragraph 2.37 highlights a significant biodiversity resource, with many European, national and local designated sites. With around 3% of England's entire designated ancient woodlands located in the district. Ancient woodlands are home to many rare and threatened species, and they are often described as an irreplaceable resource or considered as 'critical natural capital'.

There is numerous Biodiversity Action Plan(BAP) habitats present within Wealden (as Paragraph 2.39 states) and many of these areas are identified as Biodiversity Opportunity Areas (BOAs). In addition, Low Weald, according to The Land Use Framework, has a high potential for nature restoration as shown in Fig. 6 below.

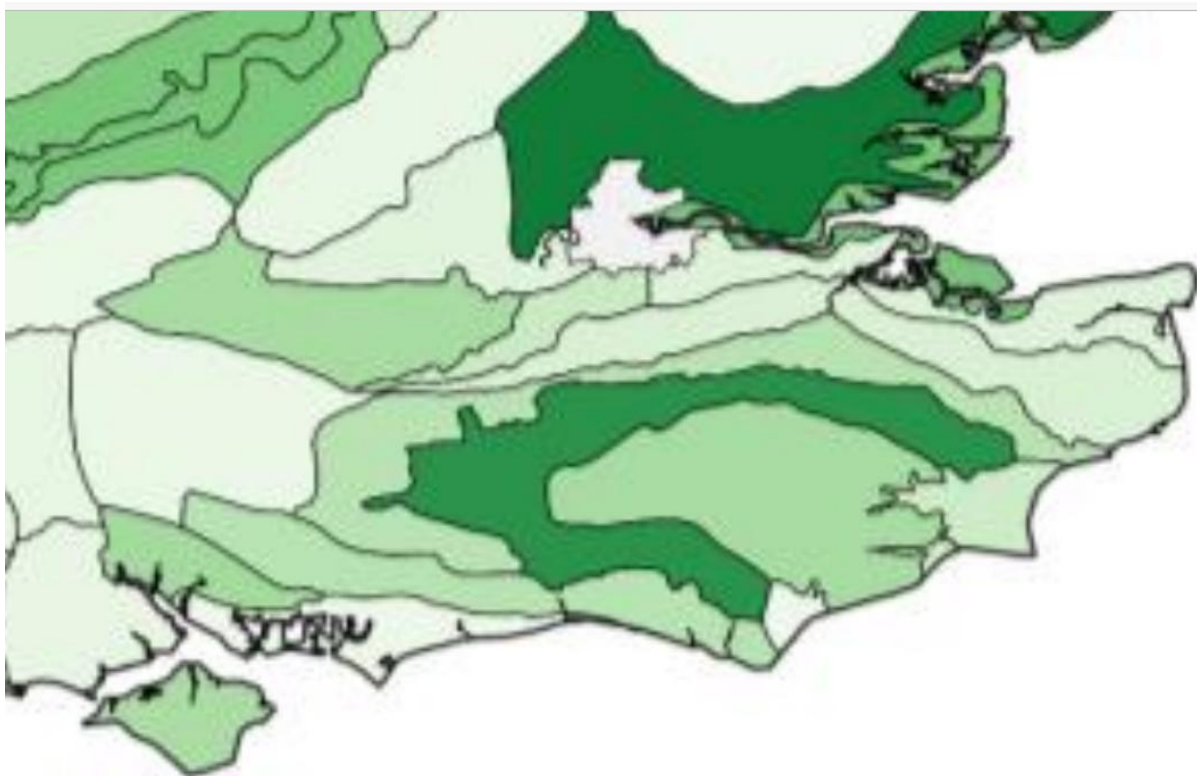


Fig. 6 Areas in England coloured by their potential for nature restoration, from low potential (white) to high potential (dark green). Credit: The Land Use Framework for England ([2026](#)).

The framework adds that the UK government remains committed to protecting 30% of land for nature by 2030, an international goal set under the [Kunming-Montreal Global Biodiversity Framework](#).

However, it notes that, at present, **just 7% of England's land is protected for nature** – with just four years to go until the deadline. Speaking at the launch of the framework, nature minister Mary Creagh acknowledged that meeting the target remains a large challenge.

Paragraph 2.33 stresses reduction of emissions and the importance of maximising natural processes that can take carbon out of the atmosphere, known as 'carbon sequestration'. Green infrastructure and nature recovery will have a major role to play in this, helping to mitigate the impacts of high temperatures, reduce flood risk, and maintain biodiversity.

As highlighted in the Draft Local Plan, there are 14 Biodiversity Opportunity Areas covering total of 12, 580 hectares of Wealden. Sadly, many of site allocations are situated within such areas

2.41 At a more local level, Sussex Nature Recovery are working with East Sussex County Council and Brighton and Hove City Council on a Local Nature Recovery Strategy (LNRS) that is new spatial plan for nature that will cover Wealden District. Wealden

District Council did also declare a biodiversity crisis in 2025 and confirms that **the Council will aim to support nature-first policies and to ensure that policies of the local plan are aligned with the goal of restoring biodiversity, functional connectivity, and ecosystem resilience, so far as achievable within the planning system.**

As stated in paragraph 3.11, the draft spatial strategy seeks to allocate the majority of growth in and around our market towns and at the edge of regional towns located outside of our district (i.e. Eastbourne and Tunbridge Wells), whilst enabling an appropriate scale of development in **a number of settlements where these have a good level of key services and facilities, can access public transport and have good accessibility to larger settlements.**

This statement contradict the 'Key Characteristics' of the Draft mentioned above.

3.12 The draft spatial strategy takes account of environmental and planning constraints. The majority of Wealden is located within the High Weald National Landscape (53%), and we have a duty to actively seek to further the conservation and natural beauty of this nationally important historic landscape.

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

3.17 In the last few years, the concept of '20-minute neighbourhoods' or 'complete, compact and connected neighbourhoods' has been put forward as an approach to help local plans deliver sustainable development.

3.50 The proposed amendments to this 'focused' draft Wealden Local Plan (Regulation 18) result in an increase in site allocations and has meant an increase in housing supply, **but we continue to be unable to meet overall housing needs** (under either scenario).

3.7 Meeting the development needs of the area is a key focus of this plan. However, we are also required to consider **whether we can meet development needs without adversely impacting areas or assets of importance, such as our designated biodiversity sites and irreplaceable habitats, protected landscape designations such as the South Downs National Park and High Weald National Landscape, designated heritage assets or areas at risk from flooding.** We must consider whether

these factors are reasons to restrict growth in our area, or whether it can be **demonstrated that adverse impacts would significantly outweigh the benefits when assessed against the NPPF as a whole.**

In spite of all these ‘sacrifices’, and fact the new draft makes provision for a further 16609 new dwellings to be delivered at the rate of 977dpa (policy SS2), there will be a **shortfall of 8160 new dwellings against the ‘target’** and at examination Wealden will be required to make up the shortfall in numbers.

Therefore the new draft includes not only new allocations but a series of option sites to meet the potential shortfall that are still being looked at. It was noted that within Council’s Assessment of Optional Sites, all optional sites were found to be unsuitable for development with a handful of further issues for assessment and uncertainties.

SITE ALLOCATIONS

Site allocations sadly proof the Council’s approach whilst searching for new sites that means demonstration **that adverse impacts would significantly outweigh the benefits when assessed against the NPPF as a whole** and a good will in policy statements would be only empty promises:

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.

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.

Policy SS2: Provision of Homes

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.

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

In line with our support for the 'bottom-up', community-led planning that is being undermined by the current government, we tend to support allocations that have been made within 'made' Neighbourhood Plans (at the scale agreed within those Plans).

We have been deeply pragmatic about the allocations that we are opposing here. Were the position created by government not so challenging, there would be others that we would actively oppose; as such, the following list is comprised of those that we consider completely untenable.

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

Overdevelopment of this site failing to respect the pattern of development in the area within the National Landscape. Further move to the countryside (60 dwellings) would be harmful to this designated landscape. This encroachment to the open countryside is entirely unacceptable. Cumulative impact of development should be considered. Policy N4 of new (draft) NPPF requires that development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities.

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

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

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

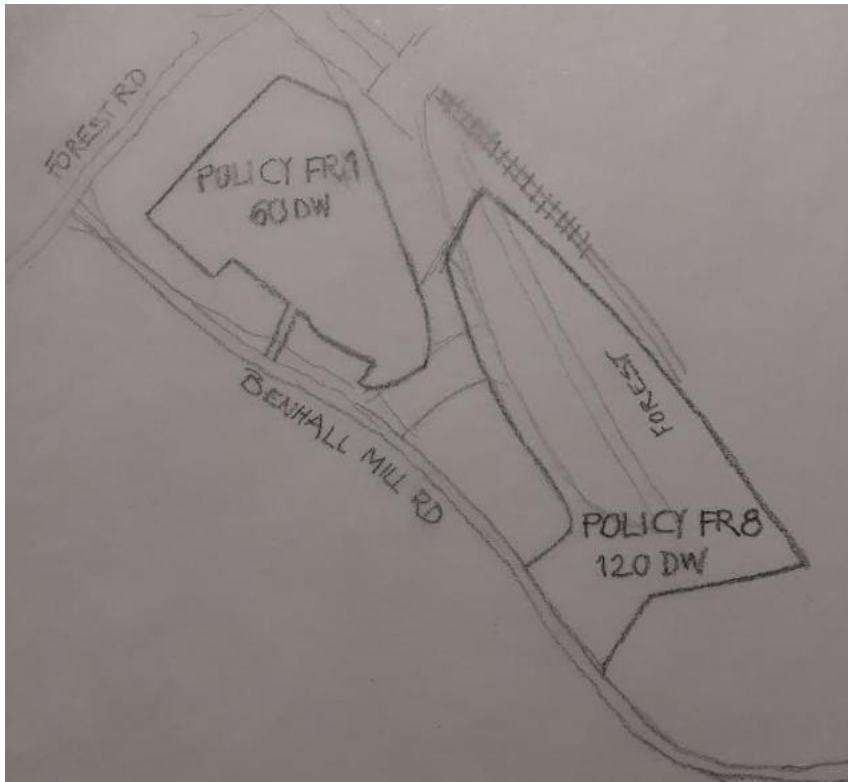
Countryside location. There is not attachment to the settlement, future occupiers would entirely rely on cars. The field in the middle of countryside surrounded by Ancient Woodland. (Outside of the protected High Weald National Landscape, the draft spatial strategy seeks to restrict development in the open countryside).

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

Countryside location, land not adjacent to the settlement (except of the small 'appendix on the northern side of rail track). Threat of damage and deterioration to the Ancient Woodland adjacent to this site. This encroachment would erode the integrity of the surrounding of this irreplaceable habitat. It should be biodiversity restoration site....

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

POLICY FR8 - Land to the east of Benhall Mill Road, Tunbridge Wells, Indicative Capacity: 120 dwellings, High Weald National Landscape, Priority Habitat Deciduous Woodland. Cumulative impact! 120 dwellings +60= 180 dwellings at the edge of settlement in protected landscape.



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

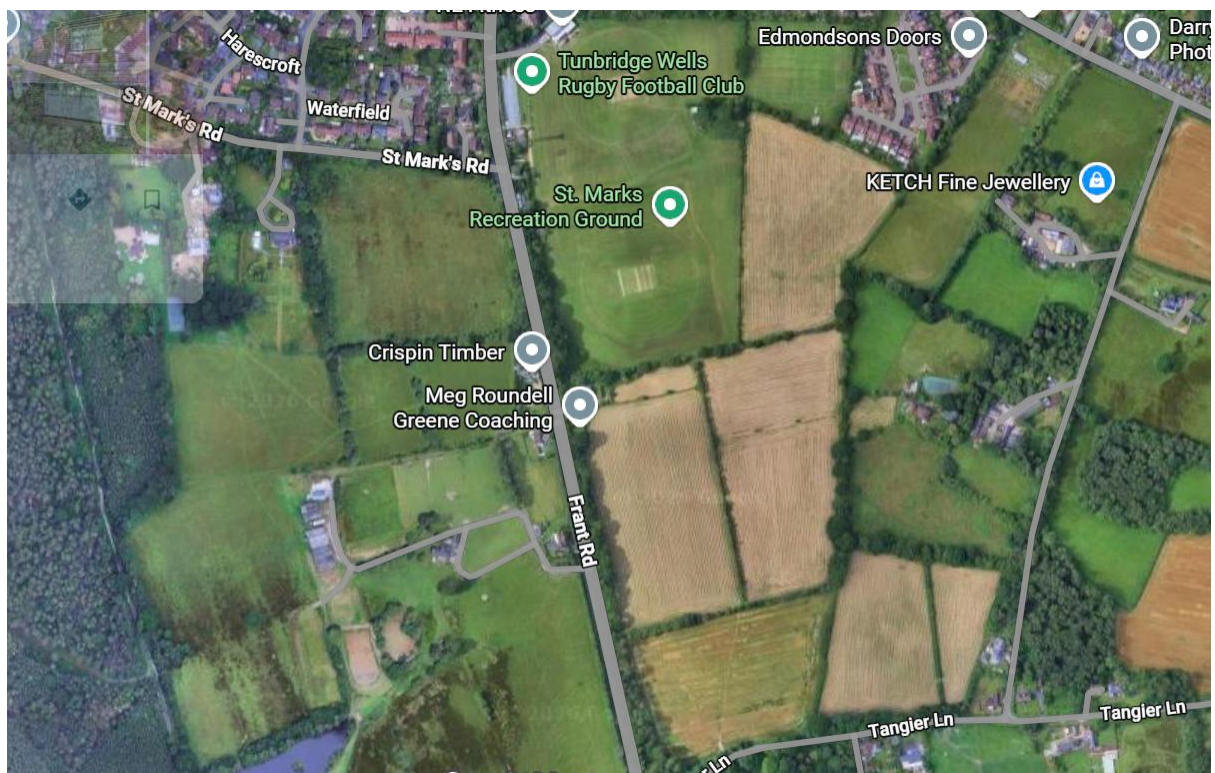
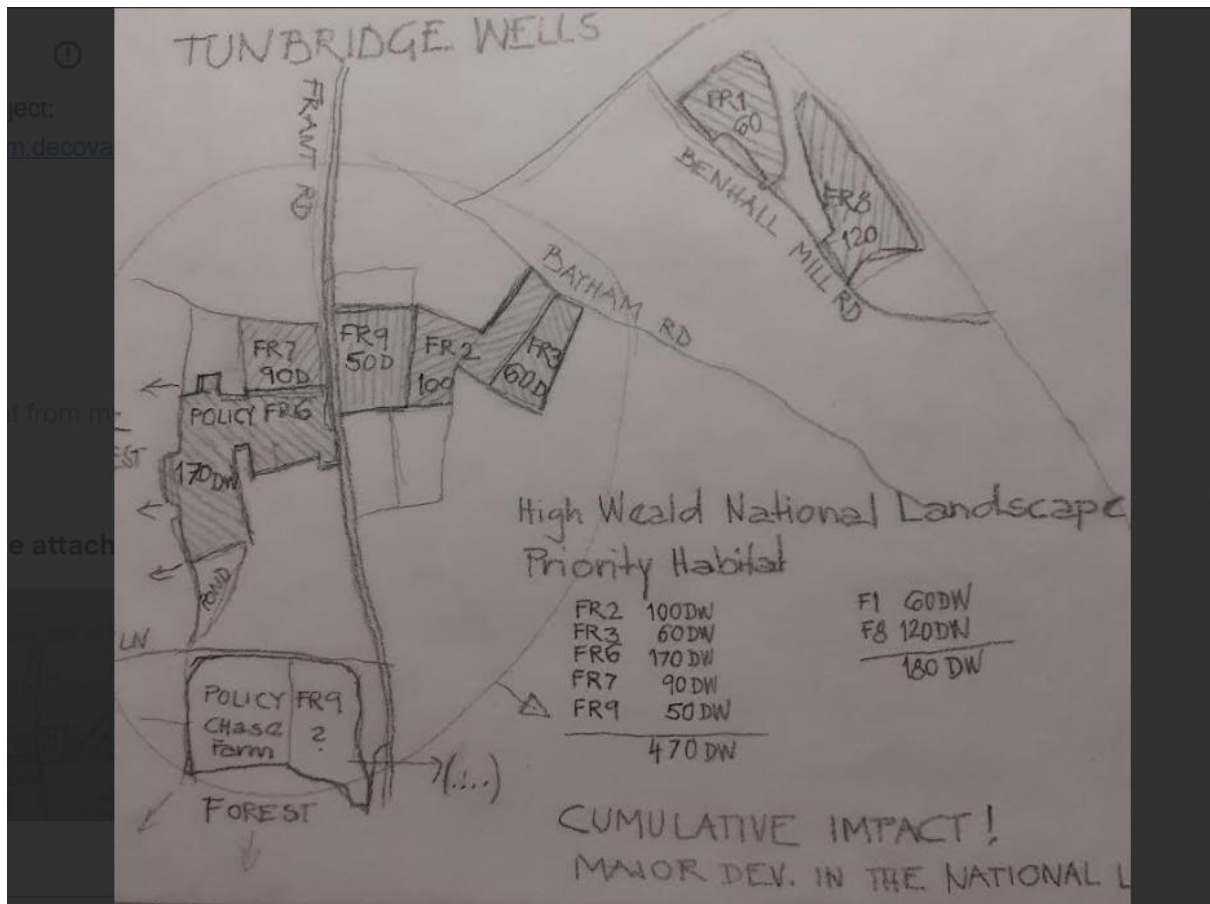
POLICY FR2 - Land off Bayham Road, Tunbridge Wells, Indicative Capacity: 100 dwellings, High Weald National Landscape

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

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

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

All this sites (as sketch shows) are generally in a juxtaposition: **POLICY FR2, FR3, FR6 FR7 and POLICY FR9 with indicative capacity of 470 dwellings within the National Landscape** represent a major development on the very edge of the settlement is not appropriate for the site within National Landscape long views and maintain the rural foreground **of the High Weald National Landscape.**



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

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

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

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

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

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

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

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



Countryside location, the Ancient Woodland within the northeast and southeast of the site and along the eastern boundary (Park Wood), the Local Wildlife Site (Jarvis's Wood, Nobody's Wood Park Wood Complex) in the south of the site, "appropriate financial contributions or on-site measures" to offset any potential biodiversity loss arising from development should be demonstrate. Is it acceptable? Entirely unsustainable location,

this development would be harmful to integrity of Ancient Woodland, contradicting the majority of the Draft Local Plan policies.

POLICY HOR6 - Coxlow Farm, Horam Road, Horam, Indicative Capacity: **750 dwellings**, 4,000sqm Employment (E(g), B2 and B8), 1,500sqm community floorspace, 2.4ha Two-Form Entry Primary School; Ancient Woodland, Priority Habitats, Flood Risk... A massive encroachment to the countryside! Village situated at the very edge of the National Landscape open towards the NP South Downs...Village with up to 1200 dwellings; 750 dwellings (almost 2/3 of exiting). Located in Low Weald with a high potential for nature restoration.

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

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

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

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

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

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

POLICY UCK11 - Land at White House Farm, London Road, Uckfield, Indicative Capacity: 240 dwellings. Ancient Woodland, Biodiversity Opportunity Area, Priority Habitat. One can't be sure which settlement is this site related to. Field on the edge of Ancient Woodland. Aiming to conurbation with Manfield and Coopers Green.... Disrespectful to the prevailing pattern of the area and natural environment. Entirely

unacceptable location against all principles of urban development. Somebody found the field for sell...

POLICY WES4 - Land to the west of the B2104, Hankham, Indicative Capacity: 15 dwellings. Adjacent to A27 instead of settlement. If this site developed it would provide a buffer for noise control to existing buildings (the only positive aspect of this site.)

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

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

WES5* Sharnfold Farm, Hailsham Road, Stone Cross 745/2070 786/2070 1132/2070 Westham Stone Cross 350 (89)*

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

Countryside location, an extension of settlement beyond bypass to the open countryside with all consequences. $350+60=410$ dwellings in countryside. demonstrate that acceptable living and amenity standards can be achieved for future occupiers of the site (rather unrealistic achievement due to Bypass to the south and wind turbines to the northwest of the site). The open countryside and open character of the Pevensey Levels, with views to the South Downs National Park prevail..

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

The development on the other side of the Lane is not considered adjacent to the settlement. The definition of "adjacent site" only parcels physically touching the site boundary are considered. This means that if the development is not adjacent to the settlement. Major development in the open countryside with unacceptable impact on integrity of Pevensey Levels Special Area of Conservation (SAC), connected to the proposal site via Martin's Ditch. The Pevensey Levels (adjacent to the site), forms a significant part of the surrounding landscape, covered by various statutory designations, including Sites of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), and Ramsar site. The majority of the site (western half) is within an area classified as being 'darker' in the light pollution mapping, significant light pollution would be introduced.

The 2023 Landscape Sensitivity Assessment states that the site landscape is moderately to highly sensitive, because of its prominent location and topography, the

site provides far reaching views northwards towards the Pevensey Levels SSSI, SAC and Ramsar site and other rural locations north of the site. A vehicular access at the south-western corner of the site would require the widening of Peelings Lane to allow for two lane traffic and pedestrian footpaths.

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

Yours faithfully

Maria Tomalova

Planning Campaigner, CPRE Sussex