

## **Consultation Questions**

### **Chapter 3 – Vision**

#### **Question 1 - Vision**

- a) Do you agree with our overall vision for the district?
- b) Do you agree with our 'mini' visions for the district?
- c) Do you agree with the objectives for the district?
- d) Should we change anything? If so, what should we change and why?
- e) Have we missed anything? If so, what have we missed and how should it be included?

#### **Response**

a) Yes, the overall emphasis on quality of life and sustainable living is appropriate, and very welcome at this time.

b) Yes. We are pleased to see the words “enhance” and “expand” used frequently in these “mini” visions. Due to the very serious losses sustained over recent years, it is critical that we now reverse climate damage and biodiversity loss, not merely contain it.

More active modes of transport are often mentioned, but we must not forget the climate-friendly role of the train, efficiently transporting thousands of passengers, using increasingly cheap electricity with small climate impact.

Economic considerations are well addressed. Within the time-frame of this plan, working from home rather than commuting to a distant office, will become increasingly the norm, and it is important that planning and infrastructure are prepared for this, as well as the local businesses set up by those who no longer suffer the daily commute, and develop their ideas within the district.

c) Yes, although it is important that we plan within Central Government guidelines, we must also live up to them, ensuring that within this framework, we do all we can for the District.

d) Please see our comments to later questions.

e) Please see our responses to later questions.

## **Chapter 4 - Spatial Strategy:**

### **Question 2**

- a Do you agree with draft policy SS1 Spatial Strategy?
- b Is there an alternative strategy that we should be considering through this Local Plan? If so, please set out what the alternative strategy should contain and why
- c Policy SS1 sets out the approach for development boundaries. Do you agree or disagree with the settlements that are identified to have development boundaries? Please set out your reasoning.
- d The policies maps set out the extent of development boundaries for each settlement identified. Do you agree with the boundaries shown? Should any changes be made, if so which settlement and why
- e Is there anything else within Policy SS1 that we should change? If so, what should we change and why?
- f Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes
- b) Yes, Policy SS1 is well considered.
- c) Yes, the settlement boundaries allocated are appropriate based on the perceived housing requirement in the Wealden District.
- d) With regard to our settlement (Heathfield and Waldron Parish) yes, we agree with the boundaries shown.
- e) No
- f) No.
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### **Question 3**

- a Do you agree with draft Policy SS2 Provision of Homes?
- b Should we change anything? if so, what should we change and why? and how should it be included?
- c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes, but can the reduction from the 2018 Submission Standard Method be justified? (See (b) below:
- b) The target of 15,729 houses in the period to 2040 at an average rate of 953 per year will need to be fully justified to the inspector, being a reduction to that

suggested by the Standard Method but the reduction is welcomed. The figure of 2000 windfall properties include 155 in Heathfield and Waldron which appears to be excessive and disproportionate, given the size of the community, inadequate infrastructure & communication, and significant landscape and other protections, and should be justified. It is also not clear whether, if and when in the Plan Process the 4,000+ additional houses required under the Standard Method will be accommodated.

c) No

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#### **Question 4**

a Do you have any comments at this stage in relation to the site at Land at West of Uckfield – Owlsbury?

#### **Response**

a) Yes - The Council should give such an extensive and large, effectively new settlement beyond the development boundaries for Uckfield the most careful and rigorous scrutiny, not least if it is not necessary to meet Wealden's Housing targets.

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#### **Question 5**

a Do you agree with draft Policy SS3 Gypsy, Travellers and Travelling Show people – Accommodation Needs?

b Should we change anything? if so, what should we change and why?

c Have we missed anything? If so, what have we missed and how should it be included?

#### **Response**

a) Yes

b) No,

. The distribution of these provisions should be satisfactorily clarified in policies. Such a distribution should be well located, but should also aim to relate to existing such sites and/or small aggregations, to avoid small individual 'pepper-potted' sites throughout the District. Such a distribution should be, where possible, planned, rather than as a result of windfall proposals on a haphazard basis.

c) No

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#### **Question 6**

a Do you agree with draft Policy SS4 Retail Provision and Town Centres?

b Should we change anything? if so, what should we change and why?

c Have we missed anything? If so, what have we missed and how should it be included?

## Response

- a) Yes
  - b) No, it is an unfortunate fact that the High Street shopping in our towns and villages is predominantly for convenience goods whereas people tend not to shop for comparison goods locally and prefer out-of-town complexes or on-line shopping.
  - c) No
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## Question 7

- a Do you agree with draft Policy SS5 Provision of Employment Space?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

## Response

- a) No
  - b) Yes. The assessment of need for additional office space since COVID 19 cannot be justified. All towns in Wealden have vacant office space and the trend for home-working has been established and in many situations is unlikely to change.
  - c) No
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## Question 8

- a Do you agree with draft Policy SS6 Strategic Employment Allocations?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

## Response

a) Yes. The provision of employment opportunities in terms of industry and warehouses is very important for Wealden especially as employment within agriculture appears to be diminishing as farms diversify. The Council will need to be sure that they have sufficiently robust policies to successfully resist retail and other town centre uses in such locations.

- b) No
  - c) No
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## Question 9

- a Do you have any comments at this stage in relation to the site at Ashdown Business park, Maresfield?

## Response

- a) Subject to the further investigations and tests being satisfactory, and flood

precautions are possible to allow development, this site could be a welcome addition for local employment opportunities.

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### **Question 10**

- a Do you agree with draft Policy SS7 Ensuring Comprehensive Development and Housing Delivery?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes
  - b) Yes, at 1(c), after 'proving' add; by appropriate viability, or other tests. At 1(d), clarify that the applicant should demonstrate through viability and marketing assessments that a shorter period for commencement would not have a negative impact upon realistic deliverability.
  - c) No
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### **Question 11**

- a Do you agree with draft Policy SS8 responding to Climate Change?
- b Do you feel the strategic policy covers the key issues we need to address in our approach to climate change adaptation and mitigation?
- c Should we change anything? if so, what should we change and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes. Broadly we do.
- b) Yes
- c) Yes By quoting that Wealden will seek to become a Net Zero District as soon as possible is better than laying down an unrealistic target. Wealden should also clarify the criteria for achieving such a target. It may also be helpful to explicitly mention avoiding the use of fossil fuels.

Furthermore, explicit reference could be made of the need to reduce waste generation, both in construction materials and construction practice and the intended occupation of the completed development.

- d) Yes. 2(k) should include investigation of the potential for new walking and cycling routes.
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### Question 12

- a Do you agree with draft Policy SS9 Health, Wellbeing and Quality of Life?
- b Do you agree with the threshold levels set out within the policy for undertaking a Health Impact Assessment (HIA) in the Wealden context?
- c If you disagree with the threshold levels set out in the policy, at what level do you think an alternative threshold should be set and why? N/A
- d Have we missed anything which may impact on the health and wellbeing of our residents? If so, what have we missed?
- e Should we make changes to this policy, and if so, what changes should we make?

### Response

- a) Yes
- b) No. In our view the thresholds set should be lower.
- c) We feel that development proposals where an HIA is expected should be on 20 residential units, and the scale of development where an HIA is automatically required should be 75 residential units. Many developments in the past have not taken the health impact of their proposals sufficiently into account, and a firm change of direction is we feel required to redress the balance toward community health, rather than density of units on sites.
- d) Yes, although the emphasis upon public spaces at SS9, e) could be stronger. Further, beautiful, as used here, can be regarded as being within the eye of the beholder, it may be that emphasis upon a development being “in keeping” with the surrounding vernacular and the greater Wealden context, would be helpful. You could also perhaps include more options for cycle use, cycle paths and the promotion of cycling. See also response to Question 10, above.
- e) Yes, See Above

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### Question 13

- a Do you agree with the Council's draft Policy SS10 for Green Infrastructure?
- b Do you feel the strategic policy covers the key issues we need to address in our approach to the retention, protection, enhancement and creation of green infrastructure?
- c Should we change anything? if so, what should we change and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes
- b) Yes
- c) No
- d) Yes. There are situations where GI and farming/agriculture are interrelated and you could consider adding this as there is continued diversification in farming and agriculture (petting farms etc.), and farmland being offered up to provide offsetting

for Biodiversity Net Gain requirements, for example. Firmer support could also be given to the development infrastructure itself, rather than simply developments which are designed to embed it.

## **Chapter 5 - Climate Change**

### **Question 14**

- a Do you agree with draft Policy CC1 Net Zero Development Standards – New Build?
- b Given the recent Ministerial Statement, how should we address net zero development standards through planning policy?
- c Should we change anything? if so, what should we change and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

**a** Yes, we broadly agree. We note and agree with the statement at 5.6 that good rail and road links should exist where growth is proposed, in the interest of sustainability.

**b** The Written Ministerial Statement makes clear that the Government will not support energy efficiency targets set by local authorities which exceed “current or planned” regulations, although what is planned is uncertain. Therefore, all that can be done is to aggressively pursue energy efficiency within these limits, and set aggressive standards where these limits do not apply. Since these standards are minimum standards, the statement demonstrates that the government does not support ambitions for housing to be more energy efficient than the minimum standards.

**c** Policy CC1,4 (a) might also make broad reference to community solar arrays, and local anaerobic digestion systems. In relation to CC1,4(b) and CC1,8(b), while financial viability arguments are recognised and understood, there is an absence of any clarifying definition of the expression in the plan. We suggest that some definition would be desirable.

**d** At 5.7 we suggest that location not just orientation should be mentioned as a factor. 9 does not propose a very challenging test. An action to achieve a carbon reduction of only 1% meets it. We would like to suggest that a Carbon reduction target be specified.

Although this may be rare, opportunities for small scale wind and hydro where possible, should not be neglected. At 5.26 we suggest that applicants should be required to demonstrate why that requirement cannot be achieved and that the lower standard proposed by the applicant is the highest standard reasonably achievable.

At 5.32 we suggest the words “retain **and** repurpose” would not extend to the refurbishment and retention of the existing use of a building. Could “retain and/or repurpose” be used instead?

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### **Question 15**

- a Do you agree with draft Policy CC2 Reducing Energy Consumption in Existing Buildings?

- b Do you consider there to be any other reasonable and viable measures for improving the energy efficiency of existing buildings?
- c Should we change anything? if so, what should we change and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes, and applaud the objectives.
  - b) So far as we are aware, no.
  - c) At CC2, 2 we invite a change to read “to consider **and to adopt** opportunities...” In relation to CC2, while economic viability arguments are recognised and understood, there is an absence of any clarifying definition of the expression in the plan. We suggest that some definition would be desirable..
  - d) Not as far as we can tell
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### Question 16

- a Do you agree with draft Policy CC3: Sustainable Design and Construction?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes
  - b) Policy CC3: 1(b) “high environmental performance” is a relative expression and as such may give rise to debate with applicants and risk appeals against refusals. We would suggest a base definition to provide measurability. CC3, 1(g) we would prefer to see a stronger statement to inhibit use of artificial grass. Perhaps “**Development design and specification should not provide for the use of artificial grass save in very exceptional circumstances**”. CC3, 2 We feel that “where possible” allows too great an opportunity to evade providing low carbon heating solutions and suggest deletion of those words. We suggest the second sentence starts “**If applicants can demonstrate to the reasonable satisfaction of the Council that this is not feasible, heating systems should**” CC3(b) contains a list of heat reduction actions. We suggest addition of the words “double roof systems”, to allow buildings to be more comfortable in heat without the need for air conditioning systems.
  - c) At 5.44 we invite a revision to read “overall environmental performance and longevity”. While it might be said that longevity could help achieve environmental performance we suggest that specific reference to it would help focus designers’ minds on the need for long term quality of construction in the interest of sustainability.
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### Question 17

- a Do you agree with draft Policy CC4 Carbon Sequestration?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be

included?

### Response

- a) Yes.
  - b) We feel that the use of the word “significant” in Policy CC4, 2 (b) is too open to interpretation. A stated target or threshold level might be better.
  - c) No.
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### Question 18

- a Do you agree with draft Policy CC5: Renewable and Low carbon Energy?
- b Subject to the Council’s renewable energy study, would you support the identification of areas within the district for locating solar farms? Please explain your answer.
- c Should we change anything? if so, what should we change and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes.
  - b) Yes. Solar farms are a vital part of our renewable energy mix. We would also support the identification of suitable areas for wind generation, and anaerobic digestion.
  - c) See above. At CC5, 1(a) we also invite the introduction of protection for existing residents, by addition of the words “**and existing residents in the locality**” after “environment” in the first line.
  - d) So far as we are aware, no.
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### Question 19

- a Do you agree with draft Policy CC6: Water Efficiency?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes.
  - b) CC6, 3: We support the requirement for new development to be designed with enhanced water efficiency, and suggest that if the proposal for a reduction from the Building Regulation Standard of 125l is not approved, given that the District is acknowledged to be an area of water stress it follows that there is a need for constraint on development. If you agree this should perhaps appear by way of amendment to 5.82.
  - c) No.
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### Question 20

- a Do you agree with draft Policy CC7: Managing Flood Risk?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes.
  - b) We are concerned that CC7(2) is limited to development within Flood Zone 3(b). We think the protections should apply to the District as a whole. We think CC7(5) should be revised by deletion of “Where required”. Those words don’t add anything but do increase the risk of arguments with applicants.
  - c) At 5.89 we think risk of impact should be managed, by revising the wording to read “should not make **or risk making** existing flood risk **within the District** worse and should reduce existing overall flood risk **within the District** where possible.” Similarly at 5.94 we think it should be made clear that consequential flood risk to other parts of the district is to be avoided. We suggest revised wording such as “ to ensure that development does not place itself, **or other parts of the District**, at increased risk of flooding and actively seeks to improve flood risk where possible.”
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### Question 21

- a Do you agree with the draft Policy CC8: Sustainable Drainage?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes.
- b) CC8, 3 (c) We are concerned that the increased use of artificial waste and surface water management systems has not been always been matched with sustainable maintenance provisions. This is likely to result in problems for some homeowners in the future. Foul water pumps and attenuation ponds are examples of the infrastructure which has become more common as development has increased of sites whose locations do not allow gravity based foul water systems and/or which require surface water attenuation. While there is little that can be done retrospectively, we could try to avoid the issue becoming worse by imposing a more demanding requirement at the time of construction. We suggest “**Demonstrate to the reasonable satisfaction of the Council that permanent arrangements are in place for the ongoing maintenance and repair or replacement of SuDS schemes. These arrangements must show the technical specifications (including frequency) for maintenance and how such maintenance will be financed, so as to ensure they are enforceable in perpetuity.**” We would also urge that these matters must be part of the decision making rather than be left to be dealt with by condition. A site should not be capable of development at all if adequate longterm drainage is not properly provided for, and applications which do not provide for public consultation on the proposed details of the arrangements should be refused.

CC8(5) might make clear what treatment is to be required. The expression “treatment” should require a technical specification to ensure that pollutants which require special treatments are dealt with.

c) No.

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## **Chapter 6 - Natural Environment**

### **Question 22**

a Do you agree with draft Policy NE1 Biodiversity, Geodiversity and Nature Recovery?

b Should we change anything? if so, what should we change and why?

c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

a) No.

b) Yes. The whole tone of this policy, and particularly Policy NE1 (1) is focused upon defending biodiversity. Really this should be the minimum and a drive to improve biodiversity, to remedy the losses inflicted in the past, should be adopted. This would be complementary to NE1 5 (g). We feel that this policy could usefully make mention of the many special zones in the Local Plan area, (as illustrated on the map) such as SSSIs.

At NE 1, 5(f) we suggest the wording could be improved. Its intent might not be clear. Perhaps use “Minimise any indirect adverse effects on habitats and species including those **caused by** recreation, lighting, disturbance, water quality, pollution or invasive species”. We would in fact prefer “Avoid” rather than “Minimise”, which is a relative expression. At least use “Take all reasonable steps to minimise...”

c) At 6.5 is it possible to compare the information in the final sentence with other LPAs? This might help show why the Council is restricted in its ability to meet housebuilding numbers.

6.23 does not explain why dark skies matter. The negative impact on insect and animal life is significant and is a direct cause of a loss of biodiversity. We would suggest some explanation here to justify Artificial Light restrictions as part of NE1 5(f).

At 6.27 final sentence, we suggest that the Council should “protect and seek to enhance these priority habitats”.

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### **Question 23**

a Do you agree with draft Policy NE2 Biodiversity Net Gain?

b Is the policy correct to require a blanket minimum 20% BNG requirement across the district or should distinctions be made i.e. higher % requirement when sites are within BOAs or other designated sites? Or should the Council have a lower or higher than 20% BNG target? Please explain your answer.

c Should we change anything? if so, what should we change and why?

d Have we missed anything? If so, what have we missed and how should it be

included?

## Response

a) No.

b) We support an ambitious biodiversity target for the plan. Although 20% may seem aggressive to some, with biodiversity and species security in such a parlous state, a higher figure than is provided for in the Environment Act 2021 schedule 14 would be better. A significant gain figure should, we feel, be applied throughout the Plan area, not simply in areas where (referring to the map provided) it has already been identified that diversity improvements are possible. (NB In NE2 Para 1, the footnote 67 reference appears to be incorrect. Schedule 14 introduces an amendment (7A) to the TCPA 1990. There is no Para 17 to Schedule 14, but 7(A) comprises 2 parts. While there is a Para 17 in 7(A) Part 2, it deals with exceptions. Para 1 of 7(A) says that in relation to grants of planning permission in England the biodiversity net gain objective is to be a condition. The exceptions to that requirement are those in Para 17 of 7(A).)

The Council should also be robust in ensuring where offsetting is proposed, that this be properly justified, and rigorously monitored and maintained.

c) See above.

d) See above

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## Question 24

a Do you agree with draft Policy NE3 Woodland, Trees and Hedgerows?

b Are the thresholds for tree provision, to increase tree cover, set out in point 7 appropriate? Please explain your answer.

c Should the policy look to set a minimum buffer for protecting woodland and trees? Please note that there is a separate policy for Ancient Woodland and Veteran Trees below. Please explain your answer.

d Should we change anything? if so, what should we change and why?

## Response

a) Yes.

b) So far as we can see, yes.

c) Yes, for the protection of existing trees, we feel a buffer of 20 metres would be appropriate.

d) No.

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## Question 25

a Do you agree with draft Policy NE4 Ancient Woodland and veteran Trees?

b Should the policy set a minimum buffer zone to protect ancient woodland? Please explain your answer.

c Do you agree our approach should expect deeper buffers on sloping sites, land with ghyll streams or where woodland is a remaining fragment from a long removed historic block of Ancient Woodland? Please explain your answer.

d Should the policy leave the determination of a buffer zone, to protect ancient

woodland form development, to a case-by-case basis? Please explain your answer.  
e Should we change anything? if so, what should we change and why?  
f Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes.
  - b) Yes, absolutely.
  - c) Yes. Your approach seems good.
  - d) No, even if an applicant wants to debate this, a sound starting point is essential.
  - e) No.
  - f) No.
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### **Question 26**

a Do you agree with draft Policy NE5 Protecting Ashdown Forest SPA?  
b Should we change anything? if so, what should we change and why?  
c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes.
  - b) No, your proposed policy ideas are good.
  - c) No.
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### **Question 27**

a Do you agree with draft Policy NE6 Landscape Character?  
b Have all of the landscape elements which development could have an impact on, either alone, or cumulatively with other development, been identified at point 3 of the policy? If you consider any are missing, please state these.  
c Should we change anything? if so, what should we change and why?  
d Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes.
  - b) Should this question refer to NE6, 4 rather than 3? Because 4 contains a list of landscape elements on which development has an impact. On that assumption, the list should include ridge top and elevated sites, probably after 4(l).
  - c) Subject to the above, no, the Policy as drafted covers the key points.
  - d) Subject to the above, no.
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### **Question 28**

a Do you agree with draft Policy NE7 High Weald National Landscape?  
b Should we change anything? if so, what should we change and why?

c Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes.
  - b) Policy NE7, 3 c) could be stronger. Not “Have regard to”, but “Will comply with”. Nor do we agree with the inclusion of the words “where relevant” because the Design Guide should be relevant throughout the High Weald National Landscape.
  - c) No.
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### Question 29

- a Do you agree with draft Policy NE8 Setting of the South Downs National Park?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes.
  - b) No.
  - c) No.
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### Question 30

- a Do you agree with draft Policy NE9 Agricultural Land?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes.
  - b) We would prefer that the development of “best and most versatile agricultural land” was prevented altogether. NE9,1 second sentence would be better worded “When determining quality, applicants should take account of the agricultural lands value in terms of its **actual and potential** contribution to food production and wider ecosystem services and natural capital.”
  - c) No.
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### Question 31

- a Do you agree with draft Policy NE10 Light Pollution and Dark Skies policy?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) No.
- b) We would prefer that Policy NE10, 1 was worded “All proposals must comply with relevant guidance on lighting within developments and must provide evidence that any negative impacts on the natural and built environment are entirely eliminated”. In fact the wording of Policy NE11, 1 “Within the district, areas of tranquillity; . . . will be protected from unacceptable levels of noise as a result of development.” might usefully also have been employed with respect to light, in NE10. We would also invite addition to this item “Covenants which prevent uncontrolled external lighting by subsequent owners of developed units should be imposed by housebuilders on first sale”. If light pollution is to be thwarted it requires ongoing restrictions not merely at outset.
- c) At 6.142 second sentence should finish “intrinsically dark landscapes and nature conservation **and biodiversity**”.
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### **Question 32**

- a Do you agree with draft Policy NE11 Noise Pollution?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes.
- b) Yes, we would prefer to see a greater emphasis placed upon the adverse effect that noise, constant or intermittent may have in the natural environment. In particular, the possible effects of noise and disturbance upon the National Landscape (AONB), the effects upon nationally and internationally protected species, and native species of wildlife, avian & ground dwelling. We also feel that NE11,2(d) as worded gives rise to the risk of argument because it does not define “unacceptable”. Unacceptable to who?
- c) See above.
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### **Question 33**

- a Do you agree with draft Policy NE12 Air Pollution?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes.
- b) The measured values which are regarded as “significant” need to be very carefully set, with full regard to the sensitivity of the Wealden context, National Landscape (AONB) and our historic environment. If this is set at too high a level, a small number

of proposals judged not to be “significant” in themselves, may easily accumulate to a very significant effect indeed. In consideration of many of these potentially deleterious effects, light, noise and air pollution, focus must be maintained on the cumulative effects of successive proposals.

c) See above.

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#### **Question 34**

a Do you agree with draft Policy NE13 Water Environment and Water Infrastructure?

b Should we change anything? if so, what should we change and why?

c Have we missed anything? If so, what have we missed and how should it be included?

#### **Response**

a) Yes.

b) NE13, 3 should not be limited to rivers. All watercourses have the potential to create damage downstream. We also feel that this policy item should not be restricted to development near a watercourse, acknowledging that other development will have less impact on water pollution. We would prefer “New development should seek to restore watercourses to their natural state, including through de-culverting piped watercourses, where relevant.” Thus, it would be for the applicant to show that a development was not capable of doing anything to affect a watercourse, whether positively or otherwise.

c) No.

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#### **Question 35**

a Do you agree with draft Policy NE14 Contaminated Land and Land Stability?

b Should we change anything? if so, what should we change and why?

c Have we missed anything? If so, what have we missed and how should it be included?

#### **Response**

a) Yes.

b) Policy NE14, 3 should not allow “unacceptable adverse impact on sensitive receptors” to be mitigated. If damage cannot be avoided or prevented, permission should be refused. Again “unacceptable” introduces uncertainty into the test in any case.

c) See above.

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### **Chapter 7 - Historic Environment:**

#### **Question 36**

a Do you agree with draft Policy HE1: The Conservation, Protection and Enhancement of the Historic Environment?

- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes.
- b) Strong wording, stating clearly that unless proposals can evidence that they comply with Policy HE1, permission will be refused in all cases, would be helpful and aid clarity here.
- c) The Policy would benefit by explicitly mentioning the value and importance of ridge roads to the historic environment, and therefore the importance of their protection.

**Question 37**

- a Do you agree with draft Policy HE2: Heritage Assets?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes.
  - b) At Policy HE2, 3 we think it best that the Heritage Statement should be prepared in consultation with the East Sussex Historic Environment Record. It is difficult to understand, given that many heritage assets are entirely irreplaceable, under what circumstances Policy HE2, 5 “Development that would demonstrably harm the significance of the heritage asset” would not be resisted. In Policy HE2, 8 a) the addition of the word “and” to the end of this wording, would have the effect of ensuring that in the extremely undesirable case of the loss of a heritage asset, at least a replacement of suitable character would replace it.
  - c) No.
- 

**Question 38**

- a Do you agree with draft Policy HE3 Conservation Areas?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes.
  - b) At Policy HE3, 1 a), b), and c) the addition of the word “and” as used in HE3, 1c) at the foot of sections HE3, 1 a) and b) would ensure that all these considerations have to be regarded within any proposal.
  - c) See above.
-

**Question 39**

- a Do you agree with draft Policy HE4 Enabling Development?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes.
  - b) No.
  - c) No.
- 

**Question 40**

- a Do you agree with draft Policy HE5: Historic Parks and Gardens?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes.
  - b) May we suggest at Policy HE5, 1 a) the addition of the word “integrity” to read, “the special historic interest, significance, character, integrity, appearance, design and layout” with the object of protecting parks and gardens from division or fragmentation. In Policy HE5, 2, we would prefer the wording “demonstrably exceeding” to the words “commensurate to” so that the harm from any proposal is outweighed by the public benefit accruing.
  - c) See above.
- 

**Question 41**

- a Do you agree or disagree with draft Policy HE6 Archaeology?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes.
  - b) No.
  - c) No.
- 

**Chapter 8 – Housing**

**Note: \*\* No mention in this draft about Exception(a) Policy for individual project decided on their merit for design, sustainability etc. This needs to be done to follow the provisions of NPPF Para 84 (e)**

### Question 42

- a Do you agree with draft Policy HO1 Housing Mix and Type?
- b Is the housing mix required for both market and affordable homes in Wealden correct in our context? If not, is there evidence to support an alternative housing mix within the district? Please explain your answer,
- c Should we change anything? If so, what should we change and why?
- d If so, what have we missed and how should it be included?

### Response

- a) Yes
  - b) Yes, the proposed emphasis on smaller and affordable homes is welcomed.
  - c)
    - (1) It would have been even better to have introduced the requirement for new housing schemes of 5 or more rather than 10 for housing mix and the requirements for affordable housing to apply on developments of 25 or more.
    - (2) The classifications of affordable and rented need better clarification/description.
    - (3) 8.16: Concerns raised about the feasibility of enforcement of sub division within a private house, or even a council/HA property. Stud wall could be erected for two children but removed when the property is vacated. This suggestion gives no thought to family tensions that could be alleviated by sub dividing (temporarily) a room. Particularly when the children are of different sexes, but below the 'legal requirement' age for separate rooms. This policy must take individual circumstances into account.
  - d) No
- 

### Question 43

- a Do you agree with draft Policy HO2 Density?
- b Is the Council's preferred approach of considering housing density on a case-by-case basis subject to the criteria listed the correct approach? Please explain your answer.
- c Should this policy instead set out minimum density standards across the district? If so what should this be? Please explain your answer.
- d Should we change anything? If so, what should we change and why?
- e Have we missed anything? If so, what have we missed and how should it be included?

### Response

- a) Yes
- b) Yes, sites have various constraints and limitations and so a site-by-site consideration is the best approach.
- c) No
- d) Yes - 8.24: Concern regarding the potential for High Rise particularly in the basically rural 'settlements' where large number of dwellings are suggested – village

service centre/primary and secondary villages as they are now called,

Question 45: Self Build. When does the '12 months' start?

e) No

---

#### **Question 44**

a Do you agree with draft Policy HO3 Brownfield Land?

b Should this policy consider supporting the redevelopment of "brownfield sites" for housing in less sustainable locations (i.e. beyond development boundaries)? Please explain your answer.

c Have we missed anything that we should include in this policy, if so, what have we missed?

d Should we make changes to this policy? If so, what changes should we make?

#### **Response**

a) Yes

b) Yes, providing there is no joining up of towns/villages which would result. Towns and villages should be allowed to maintain their own identity without the erosion of boundaries.

c) No

d) Yes: Clarification needed where it says that the development of Brownfield land for housing will be supported in suitable settlements, but then refers to being readily accessible by public footpath and a reasonable distance to that settlement, which implies that Brownfield developments are acceptable **outside** settlements!

---

#### **Question 45**

a Do you agree with draft Policy HO4 Small and Medium Sized Housing Sites?

b Should we change anything? If so, what should we change and why?

c Have we missed anything? If so, what have we missed and how should it be included?

#### **Response**

a) Yes

b) No, this policy is very much welcomed addition to the LP.

c) No

---

#### **Question 46**

a Do you agree with draft Policy HO5 Self-Build and Custom Housebuilding?

b Should the policy set the threshold to require self-build and custom build plots above or below 20 dwellings (gross)? What should the threshold be? Please explain

your answer.

c Should the marketing period for the sale of self-build and custom build housing plots be at least 12 months or should this be a longer period (i.e. 18 months)?

Please explain your answer.

d Should we change anything? If so, what should we change and why

e Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

a) Yes

b) Yes- There is a perceived demand for self-build housing and the threshold of 20 feels about right.

c) 12 months could be adequate but clarification is necessary as to when the 12 months starts.

d) Yes. At Para 3, should be 'applications', not 'applicants'?

e) No

---

### **Question 47**

a Do you agree with draft Policy HO6 House in Multiple Occupancy (HMO) and Subdivision of Existing Dwellings?

b Should we change anything? If so, what should we change and why?

c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

a) Yes

b) No, the sub-division of properties into HMO's can often mean that young people can establish a home away from parents in situations where they cannot afford other options. Care would be necessary to ensure that the location is sustainable and not a large building alone in the countryside with no amenities.

c) Yes - No mention made about where this would be suitable

---

### **Question 48**

a Do you agree with draft Policy HO7 Rural Exceptions Sites to meet Local Housing Need?

b Should we change anything? If so, what should we change and why?

c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

a) Yes

b) No

c) Yes: 1(c) Cycle Access/Foot Paths? Also, Explanation of 'First Homes' needed.

---

### Question 49

- a Do you agree with draft Policy HO8 Affordable Housing?
- b Is the proportion of affordable housing to be provided (at 35%) appropriate in the district? If not, should a higher proportion (i.e. 40% or 45%) be sought? Please explain your answer.
- c Is the Council's preferred tenure mix for affordable housing, including First Homes, correct, and if not, is there evidence to suggest an alternative tenure mix for affordable housing? Please explain your answer.
- d Where First Homes are provided, is the minimum 30% discount appropriate and if not, should this be 40% or 50%? Please explain your answer.
- e Where First Homes are provided, is a maximum price of £200,000 after discount an appropriate maximum sales value (noting that the maximum sales value nationally that can be applied is £250,000)? Please explain your answer.
- f Where First Homes are provided, is an income cap (for individual households) of around £50,000 appropriate and if not, where should this be set (noting that the maximum national income cap is £80,000)? Please explain your answer.
- g In terms of the design of affordable housing and support for "smaller clusters" of affordable housing within a housing scheme, should the scale of these clusters be defined by a number and in line with the scale of the wider scheme (i.e. small, medium and large schemes)? Please explain your answer.
- h Should we change anything? If so, what should we change and why?
- i Have we missed anything? If so, what have we missed and how should it be included.

### Response

- a) Yes
- b) Yes. The 35% is currently an accepted standard which is fair and reasonable. It is felt that a greater percentage would be resisted by developers.
- c) Yes
- d) Yes 30% discount is a very good discount for a first time buyer meeting the eligibility criteria.
- e) This would appear to be an error as Gov. Guidance on First Homes suggests that this figure is £250,000 and not £200,000 unless you are proposing the lower figure?
- f) This would appear to be an error as Gov. Guidance on the criteria for income suggests an income cap of £80,000 for individuals, couples or groups should be £80,000 unless you are proposing the lower figure?
- g) No, it is better to assess the number on a site-by-site basis.
- h) Need to confirm costs and criteria proposed for First Homes.
- i) No

---

### Question 50

- a Do you agree with draft Policy HO9 Gypsy, Traveller and Travelling Showpeople – Site Criteria?

- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
  - b) No
  - c) No
- 

**Question 51**

- a Do you agree with draft Policy HO10 Gypsy, Traveller and Travelling Showpeople – Safeguarding Sites?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
  - b) No) Yes –
  - c):49 Consideration should be given to maximum density/pitches alongside sustainable location.
- 

**Question 52**

- a Do you agree with draft Policy HO11 Specialist Housing for Older and Vulnerable People?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes, and in particular the on-site parking for staff, residents and visitors is commended.
  - b) No
  - c) No
- 

**Question 53**

- a Do you agree with draft Policy HO12 Residential Accessibility Standards?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be

included?

### **Response**

- a) Yes, and it is particularly commended on the use/integration of the Building Regulations.
  - b) No
  - c) No
- 

### **Question 54**

- a Do you agree with draft Policy HO13 Internal Residential Space Standards for New Dwellings ?
- b Is there alternative evidence to suggest that the Council should not be adopting the minimum national gross internal floorspace standards? Please explain your answer.
- c Should we change anything? If so, what should we change and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes, but the front title of the policy has a typing error and should read “for New Dwellings”.
  - b) No
  - c) As a) above.
  - d) No
- 

### **Question 55**

- a Do you agree with draft Policy HO14 Rural Workers Accommodation?
- b Do you agree that where a rural occupancy condition is removed, that a new planning condition/planning obligation should be in place to require the dwelling to remain as affordable housing in perpetuity? Please explain your answer.
- c Should we change anything? If so, what should we change and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes
- b) No. It is unlikely that a building in such a rural location would be suitable/sustainable to be put to affordable accommodation. Affordable homes are best kept in clusters in a sustainable area. 8.128: - Laudable sentiment but completely impractical and unworkable. Unlikely any RP would take on a single unit on a farm where they wouldn't be able to 'own' the property
- c) As b) above. Also, at 1(c) need clarity on what is 'vicinity'. At 6(c) marketing should be 'rigorous'.
- d) No

---

**Question 56**

- a Do you agree with draft Policy HO15 Conversion of Rural Buildings to a Residential Use?
- b Do you agree that the conversion of agricultural buildings should first consider business and tourism uses first before residential development? Please explain your answer.
- c Should we change anything? If so, what should we change and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
- b) Yes. Business accommodation is very important in the promotion of work opportunities.
- c) Yes –Para (h) is considered too restrictive. Rural workers accommodation should be permitted adequate gardens, especially family accommodation.
- d) No

---

**Question 57**

- a Do you agree with draft Policy HO16 Park Homes and Residential Caravan Sites?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
- b) No
- c) Yes. Relationship between Park Homes and Affordable Housing. Need to have the requirement of AF provision re-iterated and cross referenced to the main AF Policy.

---

**Question 58**

- a Do you agree with draft Policy HO17 Replacement Dwellings in the Countryside?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
  - b) No
  - c) Yes. The scale of any replacement dwelling in the countryside should be sustainable in terms of amenities and access. Consideration should be given to the amount of glazing permitted to prevent unwanted light pollution in the countryside. Typo at Para (f) – ‘suitably’, not ‘suitable’.
- 

#### **Question 59**

- a Do you agree with draft Policy HO18 Extensions and Alteration to Existing Dwellings, Outbuildings and Annexes?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

#### **Response**

- a) Yes
  - b) Yes. The reference to “the original dwelling” is too vague (at what point is original). Where, detached annexe is proposed, the applicant should be required to justify why this is proposed. Clarification also needed as to what qualifies as an annexe,
  - c) Yes. It is felt that advice should be given with regard to the Party Wall Act 1996 as prior knowledge would avoid many neighbour disputes
- 

#### **Question 60**

- a Do you agree with draft Policy HO19 Extensions to Residential Gardens?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

#### **Response**

- a) Yes
- b) No
- c) No

### **Chapter 9 – Infrastructure**

#### **Question 61**

- a Do you agree with draft Policy INF1: Infrastructure provision, delivery and funding?
- b Should we change anything? if so, what should we change and why?

c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Generally, agree but feel there is a lot expected from CIL and S106 funding. Concerned that in note 1.6 It is important to note that the interim IDP does not address existing infrastructure deficiencies as this is the responsibility of infrastructure and service providers. But last summer there were problems with water supply as there was insufficient processing capacity to meet existing needs in a period of hot, dry weather although there was sufficient ground water supply. Also SW pollution problems when high rainfall due, again, to insufficient processing/drainage infrastructure causing unprocessed sewage having to be released to stop sewage backing up into people's homes and businesses.
- b) Ref above
- c) No
- 

### **Question 62**

- a Do you agree with draft Policy INF2: Active and Sustainable Travel?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

- a) Yes
- b) Yes, Not much for the Heathfield area/northern end of the County. A new bus service to Brighton has been introduced, otherwise limited scope, talk of exploring developing a 'transport hub' for Heathfield in 0-5 years. New developments are likely to simply generate more car journeys due to location and ease/speed of getting around the County and further afield. Heathfield is a hilly area, with an above average aged population, which makes Active Travel less practical here. We have many narrow lanes which cyclists and pedestrians feel unsafe using due to the volume & speed of traffic. We feel that given it's inherently sustainability, and it's very low carbon footprint per passenger mile, we could set out to exploit the advantages of rail travel much more. Much of the infrastructure, local stations and trackbed exists, and the rising tide in reinstatement of once abandoned lines, rail travel could contribute significantly to our green, and sustainable travel objectives.
- c) No
- 

### **Question 63**

- a Do you agree with draft Policy INF3 Parking Provision?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
  - b) No
  - c) Yes. No recognition of issues around additional work vans to household cars that are parked at home either by employees of businesses or the self-employed.
- 

**Question 64**

- a Do you agree with draft Policy INF4 Utilities?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
  - b) Yes. Clarification should be provided as to what is acceptable to “demonstrate adequate infrastructure capacity for surface water disposal and wastewater treatment”. Consideration should be given to the adoption of the requirements of The Building Regulations 2010 Approved Document H. Also, confirmation as to when/if a closed cesspool could be considered appropriate.
  - c) Yes. The continued increase in housing numbers is going to have a limiting effect on the supply of water to homes and we already frequently experience hosepipe bans, poor mains water pressure or worse still a complete loss of water supply. The investment plans of SEW and SW are vague on timeframes and look very limited for short term improvements to water supply and quality/reduction in pollution from waste water. SEW proposal for a new reservoir not expected to be in place until 2041.
- 

**Question 65**

- a Do you agree with draft Policy INF5 – Safeguarding of Infrastructure?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
  - b) No
  - c) No
- 

**Question 66**

- a Do you agree with draft Policy INF6 – Digital and Communication Infrastructure?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

## Response

- a) Yes
- b) No
- c) No

---

### Question 67

- a Do you agree with draft Policy INF7: Local services and Community Facilities?
- b Should policy EC8 apply to all local services and community facilities including publicly owned services and facilities (such as public schools, public libraries, public medical facilities or should Policy EC8 just apply to commercial local services and facilities, such as public house and shops?
- c Should we change anything? If so, what should we change and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

## Response

- a) Yes
- b) Yes, EC8 should apply to all local services and community facilities including publicly owned services and facilities.
- c) See above
- d) Yes, There is limited access for residents in Heathfield to medical and dental services beyond the GP and dental surgeries which are themselves stretched to meet demand for their services. The minor injuries units in Uckfield and Crowborough are not readily accessible by public transport. The hospitals are based along the coast and difficult, if not impossible, to access by public transport, there are no direct bus routes to Hastings or Bexhill for example. Patients either have to go by car or rely on friends and relatives for lifts. Otherwise they have to use expensive taxis or the elderly can access the Age Concern medical transport service but this still has a cost. To go to Bexhill for an eye appointment for example is charged at £25 for the round trip and the service relies on the availability of volunteer drivers. Although the plan does look at the capacity and number of school places at primary and secondary level, there is not very much about Early Years provision. In particular the availability of child care for the under 2s. If young families are to be catered for they may well require child care to allow parents/carers to work and contribute to economic activity.

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### Question 68

- a Do you agree with draft Policy INF8 – Open Space, sports and recreation provision?
- b Should we change anything? if so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

## Response

- a) No
- b) Yes, under “Retention of Local Services and Community Facilities” you should include the need to re-open/re-establish existing public toilet facilities which have been closed/lost and consider the need for additional such facilities as Wealden is

not well served in that regard

Consideration should also be given to the potential for providing a new indoor swimming pool for Heathfield, for which planning permission has already been granted and a material commencement made.

c) Yes, there appears to be no mention of medical services? Surely, it is well known that both doctors and dentists are very “thin on the ground” and future development should take this into consideration. Also, hospital attendance involving transport over some distance, there should be further consideration of the ever-increasing need of our elderly residents who do not always have the use of a car.

Sports fields, Heathfield lumped in with Heathfield and rural south which extends down to Pevensey on one side and the South Downs on the other side of Hailsham and Polegate areas. Does not give any meaning to the figures for supply of different sports pitches. Bit on Hardy Roberts field improvements but very little else.

Heathfield already undersupplied with pitches. Amenity space: Heathfield cited as below the recommended level of open space/park/play parks. Reliance on developer contributions/CIL/S106 to provide funding.

## **Chapter 10 - Design:**

### **Question 69**

a Do you agree with the Council’s draft Policy DE1 Achieving well designed and high-quality places?

b Have we missed anything that we should include in this policy, if so, what have we missed?

c Should we make changes to this policy? If so, what changes should we make?

### **Response**

a) Yes

b) Need to emphasise in Context & Identity the vital importance of ensuring streets with high quality hard and soft landscaping.

c) Emphasis needs to be made on the importance of Pre-Application Planning engagement with Wealden District Council

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### **Question 70**

a Do you agree with the Council’s draft Policy DE2 Achieving well designed and high-quality places?

b Do you agree with the size of development on which we are requiring the use of Design Codes and Masterplans?

c Have we missed anything that we should include in this policy, if so, what have we missed?

d Should we make changes to this policy? If so, what changes should we make?

### **Response**

a) Yes

- b) Such Codes and Masterplans should also be considered for significant residential developments as well as non-residential development, whatever their size, at the discretion of the LPA, in the context of local circumstances and vernacular.
  - c) No
  - d) As per (b) above.
- 

**Question 71**

- a) Do you agree with draft Policy DE3: Spaces for people, nature and the public realm?
- b) Is there anything we have missed that we should include in this policy? If so, what have we missed?
- c) Should we make changes to this policy? If so, what changes should we make?

**Response**

- a) Yes
  - b) At 2(d), it is considered that the co-ordinated approach to design should not over-distinguish between private and public places, such that there should be a distinction, but with an element of design throughflow to ensure a more integrated approach.
  - c) See (b) above
- 

**Question 72**

- a) Do you agree with draft Policy DE4 Shop Fronts and Advertisements?
- b) Have we missed anything that we should include in this policy? If so, what have we missed?
- c) Should we make changes to this policy? If so, what changes should we make?

**Response**

- a) Yes
- b) In addition to the references to Listed Buildings & Conservation Areas in this Policy, it is considered that such criteria as set out at 1 (b), (c) and (d) and regarding Advertisements, reference should also be made to designated Buildings of Local Importance/Significance
- c) See (b) above

**Chapter 11 - Economy:**

**Question 73**

- a) Do you agree with draft Policy EC1 Sustainable Economic Prosperity and Investment?
- b) Should we change anything? If so, what should we changes and why?

c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

a) Yes

b) Whilst we agree broadly with commentary, we would stress that particularly on matters related to start up and small businesses the requirements to keep conditions and regulations appropriate/simple such that commercial viability is recognised as low cost solutions are fundamental to such businesses.

c) In addition, we believe there could be mention of supporting opportunities where small start-ups might share a commercial site for cost control and shared interest.

---

### **Question 74**

a Do you agree with draft Policy EC2 Existing Strategic Employment Sites?

b Do you agree with the list of existing strategic employment sites defined in this policy? Are there any missing, or are there others that should be included?

c Should we change anything? If so, what should we changes and why?

d Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

a) No, the commentary seems unduly restrictive on potential Trade Counters which can reasonably provide both good employment opportunities and allow small businesses to keep commercially viable

b) Yes, in addition to sites identified as existing trade areas suggest following are included

1. Crown Yard – Burwash Rd
2. Monkhurst House offices, Sandy Cross Lane
3. Burnt Oak Business Park Waldron

c) See (a) & (b) above

d) See (b) above.

---

### **Question 75**

a Do you agree with draft Policy EC3 Retention and/or Loss of Non-Strategic Employment Sites, Premises or Floorspace?

b Should we change anything? If so, what should we changes and why?

c Have we missed anything? If so, what have we missed and how should it be included?

### **Response**

a) Yes

b) No

c) No

---

**Question 76**

- a Do you agree with draft Policy EC4 Rural Economy?
- b Should we change anything? If so, what should we changes and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
- b) We would suggest that restrictions applied to developments carefully balance the likely benefit of any commercial development against the potential environmental and biodiversity impacts the development may create.
- c) No

---

**Question 77**

- a Do you agree with draft Policy EC5 Equestrian Development?
- b Should we change anything? If so, what should we changes and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
- b) Re Equestrian sites – where suggestion is made that ratios of horses requiring 1-1.5 acres this should be mitigated for instances where the welfare of the animal a more restricted space is required (sickness, lameness etc., etc.,) which may mean this ratio could be reduced. In addition, the requirements on such sites can mean increased shelter, storage should be considered in reviewing applications. In addition, we would suggest that the removal of permitted development rights would be wrong in circumstances where the size of paddocks need to be removed for good reason.
- c) No

---

**Question 78**

- a Do you agree with draft Policy EC6 Tourism Facilities and Attractions?
- b Should we change anything? If so, what should we changes and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
- b) No

c) No

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**Question 79**

- a Do you agree with draft Policy EC7 Visitor Accommodation?
- b Should we change anything? If so, what should we changes and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
  - b) No
  - c) It appears “wild camping” sites are omitted it should also be stressed that on any sites considered for such sites with minimal facilities/ buildings etc those buildings that are permitted should be appropriate to the area and blend in as far as possible. In addition, facilities on such sites should be located appropriately and be of sympathetic appearance. Further for wild camping sites strict restrictions on the dumping of waste (human and rubbish) should be applied.
- 

**Question 80**

- a Do you agree with draft Policy EC8 The Retention of Sites in Economic or Tourism Use and Commercial Community Facilities?
- b Should we change anything? If so, what should we changes and why?
- C Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
- b) No
- c) No

**Chapter 12 - Town Centres:**

**Question 81**

- a Do you agree with draft Policy TC1 District, Service and Local Centre Hierarchy and “Town Centre” First Principles
- b Do you agree with the “centres” included with the District, Service and Local Centre Hierarchy and their position within the hierarchy? Please explain your answer.
- c Should we change anything? If so, what should we changes and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes

- b) Yes. The level of retail provision is a useful indicator of what each centre offers, respectively providing the services/facilities to their community and surrounding ones. Within the hierarchy, there is a desire to improve the viability and vitality of the centres.
  - c) No
  - d)No
- 

**Question 82**

- a Do you agree with draft Policy TC2 Sequential and Local Impact Test?
- b Is the Local Impact Test threshold for retail of 350 sq m correct in the Wealden context? Please explain your answer.
- c Should we change anything? If so, what should we changes and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
  - b) No – any development on the edge of or out of town should have a consultation not just 350 sq m as this could have an impact on other local business
  - c)Yes –refer to answer b) above
  - d)No
- 

**Question 83**

- a Do you agree with draft Policy TC3 Primary Shopping Areas?
- b Should we change anything? If so, what should we changes and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

**Response**

- a) Yes
  - b) No
  - c) No
- 

**Question 84**

- a Do you agree with draft Policy TC4 Garden Centres?
- b Should we change anything? If so, what should we changes and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

## Response

- a) Yes
- b) No
- c) No

## **Chapter 13 - Site Allocations:**

### **Question 85**

- a Do you agree with draft Policy SA1 Housing and Mixed-use Site Allocations?
- b Do you agree with the site allocations listed within the policy and if not, what are the reasons for this? Please explain your answer.
- c Do you believe that there are potential site allocations missing from the policy, and if so, what site allocations are missing and what are the reasons for this? Please explain your answer.
- d Should we change anything? if so, what should we change and why?
- e Have we missed anything? If so, what have we missed and how should it be included?

## Response

a)Yes, however, it must be first understood that the assessed Housing Need within the Draft Local Plan of 15,729 between Oct 2023 and March 2040 is over 4,000 less houses than the 19,800 suggested by The Standard Method. This reduced figure, whilst welcomed, is yet to be justified and robust justification will be necessary to convince the inspector.

b) Yes- Looking solely at our Parish of Heathfield and Waldron, the sites allocated are not extreme in number but there is a concern with regard to the number concentrated in Cross in Hand and the further loss of green space (**HEA1, HEA6 & HEA9**) all of which are located in the High Weald National Landscape AONB).

**Cross in Hand:** Whilst it is arguable that these developments could be deemed sustainable, considerable attention will be required in terms of design and consideration due to the high quality landscape locations, and impact on the landscape itself, not least in terms of **HEA1 & HEA6**, with prominent views over the local landscape, with potential impacts on the landscape through lighting, residential activity, predation, etc. Including substantial landscaping buffering for **HEA1 & HEA6**

**HEA9** potentially represents somewhat of an infill, but satisfactory access will be paramount.

**Heathfield:** Within Heathfield the sites allocated are generally less onerous and indeed, **HEA3** was previously granted planning permission for the same number of houses proposed.

However, any development of **HEA4** needs to be carefully assessed against this location in the National Landscape (AONB). As well as Heathfield Park it abuts, and

residential properties in Tower Street, either side of the access indicated to be gained.

**HEA2** is, however, located within the High Weald National Landscape (AONB), and although it is acknowledged that it is a significant reduction in numbers proposed from the previously withdrawn Submission Local Plan, it is still in a prominent location in terms of landscape and streetscape, and makes a valuable contribution of undeveloped open space close to the Town Centre.

It is also located at the busy junction of Tilsmore Road and Ghyll Road on a steep hill, with access certain to be on to Ghyll Road, (which has already been subject to not altogether successful traffic calming in view of the high volume & speed of traffic), and the potential of such impacts, not least in view of the proximity to the Cross in Hand CEP School, should be considered.

Further the following points should be considered for area **HEA2**:

1. Retention of public footpath no.77 along its existing alignment, together with existing bordering landscaping and provision made for drainage to avoid run-off from development site onto the footpath. (it would be unacceptable & inappropriate to remove, degrade or divert this longstanding public footpath linking Ghyll/Tilsmore Roads with Pook Reed Lane and the wider public footpath system)
2. Retain and protect TPO trees and make appropriate provision for native tree & hedge planting within the development layout to comply with High Weald management requirements, and help ease the development into the verdant character of this part of Ghyll Road.
3. Distance buildings from the common boundary with Jubilee Park to minimise impact.
4. Provide for planting to strengthen and close up the tree/hedge line along the south west boundary.
5. The site layout is to exclude any provision for the estate road or vehicular access to continue into adjoining land and the existing field access off Pook Reed Lane is to be permanently closed off. (Traffic hazards & loss of rural character in Pook Reed Lane should be avoided.)

**HEA5** is well located in terms of existing residential development, not least Millennium Way, but will need to be carefully designed and laid out so as to avoid adverse impacts on National Landscape (AONB) and Priority Habitats. Access could be an issue, and ideally combined with the existing Millennium Way development, subject to practicality.

**HE8** will need to be very carefully assessed, given the location in National Landscape, (AONB), and potential impacts upon Ancient Woodland and Priority Habitats. Access will also be a key issue as also drainage/flooding, all of which have militated against any development being supported at this site previously. There are also clear potential issues of significant ground contamination as confirmed by Wealden/Rother HES. Were this allocation to be supported, it should not potentially facilitate any development beyond.

- c) No
- d) Consideration to (b) above
- e) There is concern over the number of Windfall Properties allocated to Heathfield (155) and where those might be located, in addition to any satisfactory justification as to the derivation for this number.

**Heathfield & Waldron Parish Council**  
**23<sup>nd</sup> April 2024**

Draft