

Wealden Local Plan Consultation

Response Guide

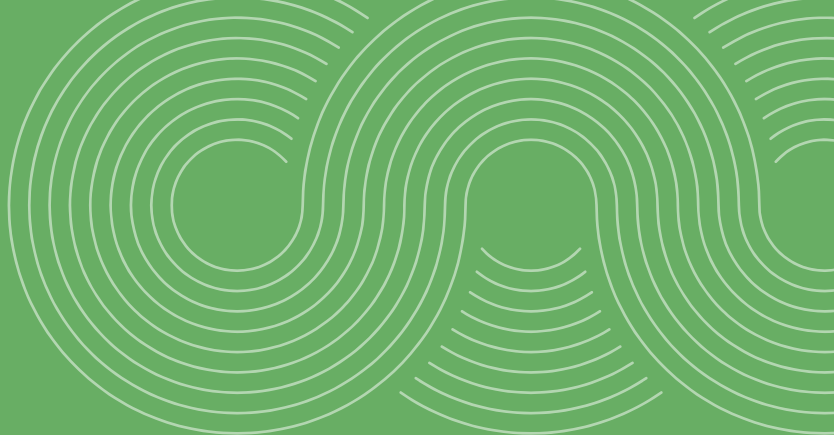
Consultation period:

15th March - 10th May 2024



[Read full draft plan](#)

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BIG 5

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Responding to the plan

To respond you first need to Register - you can register by using [this link](#)

Consultation Home 



Welcome to Wealden District Council's Planning Policy Consultation Portal

Regulation 18 Draft Local Plan

Regulation 18 Draft Local Plan Consultation

ABOUT THIS CONSULTATION PROPOSAL WP

Draft Local Plan

- Foreword
- List of Strategic Policies
- Chapter 1 Introduction
- Chapter 2 Wealden District Key Characteristics
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2. You can then work your way through the Chapters and respond to the Questions that apply to you within them. You do not have to respond to ALL questions. SABRE's advice concentrates mainly on Chapter 4

1. Click on the arrow in the right hand corner to go to Register and create a username and password.

3. Scroll to the Question you wish to respond to and click ADD COMMENT

Question 5
Consultation Questions

a. Do you agree with draft Policy SS3 Gypsy, Travellers and Travelling Showpeople – 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?

ADD COMMENT

Save

4. You can save a draft and go back to it later. Once you click save you will receive an email from keystone@objective.com confirming you have saved and giving you a link to get back into the form again

5. Once you are ready you can click Submit on that question to confirm.

Your comment has been saved as a draft, but not yet submitted.
To view or amend your draft comments, click the "View Comment" labels.
Once you have added all comments, click the "Submit" button.

SUBMIT

6. Tell us you have completed your response [CLICK HERE](#)



Draft Wealden Local Plan (Regulation 18) Consultation
Guidance Notes for Consultees

Wealden Draft Local Plan

Wealden District Council is preparing a new Local Plan. The new Local Plan will be the key planning document for the District, excluding the area covered by the South Downs National Park Authority. The South Downs National Park has planning powers for its own area. Once adopted, the Local Plan will form part of the Development Plan for the District, replacing all existing local plan policies and will be used to assess and make decisions on planning applications.



[view Wealden's Guidance Notes on completing the plan](#)

Click above to view a useful video on how to register and respond to the plan

Choose the BIG 5 or the PERFECT 10

The following pages contain SABRE's response on both positive and negative aspects of the plan. Feel free to copy and edit into your own words if you can.



**BIG
5**

If you are short of time, then we suggest you at least complete these 5 questions. These are the main issues that SABRE and SABRE-OWL is concerned with and strongly disagree with on the plan. There is a lot of scrolling down to do to find the Questions.

The GOOD NEWS is that all these 5 Questions are in Chapter 4.

**PERFECT
10**

Ideally, if you can complete a further 5 questions this will give a fuller response to the plan, highlighting 5 key areas that SABRE and SABRE-OWL generally supports in the plan.

Question 2**Consultation Questions**

- 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 as drawn? Should any changes be made, if so, what changes would you make to which settlement boundary 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?

SABRE suggests answering Question 2b (*scroll down and find it after paragraph 4.6 and Policy SS1*)

Feel free to refer to the below in your response - you can copy and paste the text below and put into your own words

Wealden, one of the most rural South East Districts, contains protected landscapes and lacks adequate infrastructure. The Spatial Strategy overlooks the larger regional context, failing to acknowledge:

1. Wealden's rural nature surrounded by major urban centres like Tunbridge Wells, Haywards Heath, Crawley, Brighton and Eastbourne, which offer comprehensive services and integrate with national and regional transport networks.
2. The integration of these towns with the vital Strategic Road Network (SRN) facilitates accessibility and connectivity.
3. Except for the A27 around Eastbourne, Wealden lacks significant SRN access.
4. Uckfield, centrally located, lacks major urban amenities and SRN access, and only provides a limited rail service, making it unsuitable for large-scale developments.
5. Evidence suggests any additional Employment Land allocation should be near Eastbourne, benefiting from SRN access and proximity to urban services, reducing long-distance commuting.
6. Similar considerations should guide larger housing allocations, concentrating development near existing infrastructure.
7. Biodiversity and ecological sensitivity and vulnerability are more pronounced in the north, around Uckfield and Maresfield, and near the Ashdown Forest.
8. The south of Wealden faces fewer constraints, as evidenced by the Council's data, making it a more suitable location for major development land allocations.
9. The Spatial Strategy must consider the broader regional structure and character, not solely focusing on Wealden in isolation.

Paragraph 4.14 emphasizes the need for a balanced approach to out-commuting. While discouraging long-distance travel, realistic policies must address concerns raised regarding Employment Land Allocation Policies SS5 and SS6. Overly simplistic approaches risk overlooking nuanced challenges and may not effectively address the issue of commuting.

Chapter 4 - Land West of Owlsbury Farm Question 4

[ADD COMMENT](#)**Question 4****Consultation Questions**

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

SABRE suggests answering Question 4a (*scroll down and find it after paragraph 4.5 and Figure 10*)

Feel free to refer to the below in your response - you can copy and paste the text below and put into your own words

The proliferation of developments without adequate master planning and integration with existing infrastructure has been a recurring issue, driven by developer and landowner decisions focused on maximizing returns.

The emphasis should shift towards collaborative master planning (the District Council with Parish/Town Councils, residents, businesses, landowners and public agencies) with communities to ensure sustainable growth, incorporating factors like walkability, public transport access, and essential amenities. Uckfield stands as a prime example of deficient master planning, with random site promotions lacking an overarching plan for the town.

The Owlsbury Farm proposal epitomizes this trend, where a substantial development is put forward without transparent scrutiny of Uckfield's growth needs. The census data reveals a modest population (15,033 Census 2021), yet the Draft Local Plan suggests a significant increase in homes, raising questions about the feasibility of absorbing such rapid growth, an increase in population of 9,340 (61%). Moreover, Owlsbury Farm's remote location exacerbates connectivity challenges, hindering Uckfield's evolution as a compact, walkable neighbourhood.

Concerns extend beyond infrastructure to environmental impacts, including threats to ancient woodlands, watercourses, biodiversity, and the broader landscape. Notably, the proposal jeopardizes the integrity of the Ashdown Forest, exacerbating flood risks, and compromising carbon storage.

In conclusion, the allocation of land west of Uckfield/Owlsbury Farm for residential development is not justified, as the adverse impacts far outweigh any perceived benefits. This allocation contradicts the National Planning Policy Framework (NPPF) and undermines the draft Local Plan's core vision and objectives.

It is imperative to prioritize sustainable development practices, rooted in transparent master planning and community engagement, to safeguard the integrity of both urban and rural areas.

Question 7**Consultation Questions**

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

SABRE suggests answering Question 7b (*scroll down and find it after paragraph 4.66 and Policy SS5*)

Feel free to refer to the below in your response - you can copy and paste the text below and put into your own words

The Employment and Economic Study for Eastbourne and Wealden, conducted by IcenI Projects in April 2022, serves as the basis for employment land allocation decisions. Three analytical methods—Labour Demand (based on potential economic growth and so employment growth), Labour Supply (based on housing growth of 1,200 new homes per year and thus jobs needed), and Past Take Up (based on historic trends of actual development by the commercial property market) —are employed to determine industrial and warehouse employment land requirements. The IcenI Study chose to recommend only the results of the Past Take Up model assessing how much employment land should be allocated in the plan.

The Labour Demand model suggests a net need range of 0.3 to 0.6 ha before adjustments, while the Labour Supply model indicates a need of 8.7 ha. In contrast, the Past Take Up model recommends the much larger amount of 48.3 ha based on historical trends.

However, relying solely on the Past Take Up model neglects the rural character of Wealden and its environmental constraints. Continuous perpetual industrial development at past rates exacerbates infrastructure strain and greenfield loss. Thus, a comprehensive analysis considering factors like environmental capacity, demographics, and transport infrastructure is crucial.

Applying the Labour Supply model (ie how many jobs would the future population potentially need) substantially reduces the land requirement to 32,057 sq m for industrial and warehouse floorspace. This contrasts starkly with the unqualified development market driven Past Take Up model's output of 134,040 sq m (an area more than twice the size of current planning application for the Ashdown Business Park Expansion), which has been used for Policies SS5 and SS6.

Despite the significant disparity in model outcomes, there's no clear rationale for prioritizing the Past Take Up model over others, especially considering the district's spatial and environmental context. This discrepancy should inform further policy development as outlined in the Draft Local Plan.

Excessive employment development land provision beyond the Labour Supply model exacerbates rural in-commuting, contradicting the Local Plan's objectives. Additionally, adopting historic low-density development ratios perpetuates inefficient land use and stifles innovation.

Policy SS5, already providing 84,850 sq m of employment floorspace, appears to exceed requirements based on Labour Supply Analysis (32,057 sq m). This underscores the need for a balanced approach that aligns with actual population needs and considers sustainability principles.

Question 8**Consultation Questions**

- 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?

SABRE suggests answering Question 8b (*scroll down and find it after paragraph 4.69 and Policy SS6*)

Feel free to refer to the below in your response - you can copy and paste the text below and put into your own words

Policy SS6, building upon the analyses of Question 7 and Policy SS5, concludes that existing employment land allocations are sufficient, removing the need for additional land allocations. However, it's noted that increased floorspace could be achieved on current allocated sites through innovative design approaches such as more compact buildings and reduced parking provision.

Paragraph 4.68, while addressing the A26/A22/A27 corridor, overlooks critical east/west routes, especially the limitations of the A272, and optimal development nodes, potentially misapplying NPPF para 87. Storage and distribution require robust road networks, favouring locations like the A22/A27 junction over the A272 due to superior connectivity and proximity to Eastbourne's facilities and services.

Reiterating the key points from Question 2, Wealden's rural nature surrounded by major urban centres demands recognition. These urban centres offer comprehensive services and integrate with national transport networks, contrasting with Wealden's limited infrastructure. Uckfield's spatial isolation makes it unsuitable for large-scale industry or housing, while the south near Eastbourne is recommended for any additional employment land allocations, aligning with consultants' suggestions and benefiting from SRN access and proximity to urban amenities. Similar considerations apply to housing allocations, with the north of Wealden presenting more sensitive landscapes and biodiversity concerns compared to the south.

Therefore, major land allocations would pose greater harm in the north, emphasizing the need for a spatial strategy that acknowledges the region's structure and character comprehensively, rather than narrowly focusing on Wealden in isolation.

Chapter 4 - Ashdown Business Park, Maresfield Question 9

[ADD COMMENT](#)**Question 9****Consultation Questions**

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

SABRE suggests answering Question 9 (*scroll down and find it after paragraph 4.74 and Figure 12*)

Feel free to refer to the below in your response - you can copy and paste the text below and put into your own words

The proposed allocation for the expansion of the Ashdown Business Park, including the current extension proposal, lacks justification based on an extensive analysis:

1. Despite the potential size of the proposed expansion, analysis suggests there is no need for additional employment land allocation.
2. Detailed assessment of the Council's evidence base and spatial character of the District highlights the unsustainability of the allocation, demonstrating adverse impacts on economic, social, and environmental objectives.
3. Environmental concerns include significant adverse impacts on ancient woodlands, watercourses, biodiversity, and the Nature Recovery Network.
4. Adverse impacts extend to the Ashdown Forest, landscape sensitivity, dark skies, tranquillity, flood risk, and carbon storage.
5. Transport-related impacts, particularly on road networks, would be severe due to the remote location's reliance on high Green House Gas emitting travel.
6. Economic impacts would be adverse, including overprovision of floorspace, promoting out-of-town development, and conflicting with tourism and leisure opportunities. The direct impacts of the town centre of Uckfield and its commercial, retail and hospitality activities would be severe.
7. Social impacts encompass harm to communities, living conditions, and cultural well-being.
8. The available evidence rebuts the necessity and suitability of the allocation, emphasizing its unsustainability, adverse impacts, and inconsistency with climate and biodiversity goals.
9. Contrary to NPPF provisions and the draft Local Plan's objectives, the proposed allocation fails to address employment needs while exacerbating environmental and social concerns.

In summary, the proposed allocation for the Ashdown Business Park expansion contradicts sustainable development principles, jeopardizing climate, biodiversity, and employment objectives. Other sites should be considered/investigated should additional land eventually be required.

**BIG 5
COMPLETE!**

Scroll down to carry on and complete the PERFECT 10! or please [click here](#) to let us know you have completed your response

Question 22**Consultation Questions**

- 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?

SABRE suggests answering Question 22b (*scroll down and find it after paragraph 6.48 and Figure 19*)

Feel free to refer to the below in your response - you can copy and paste the text below and put into your own words

The need to enhance the long-term resilience of the District's natural environment is strongly supported. The District Local Plan (DLP) highlights that 61% of woodlands in the district are Ancient Woodland, a significant proportion nationally.

The District Local Plan should emphasize this in the context of national significance, as demonstrated by the example of the High Weald National Landscape. Additionally, the District's Ancient Woodland represents an irreplaceable habitat of exceptional national importance.

There are other aspects of Wealden's natural environment of national and/or international significance, including various designated sites for biodiversity (Ashdown Forest, Pevensey Levels, Sites of Special Scientific Interest, Ancient Woodland, Local Wildlife Sites). Policy NE1 is endorsed, with a suggestion for improvement by incorporating a requirement for sequential preference (to make sure the least sensitive sites are looked at) and independent comparative assessments of alternative sites to mitigate adverse impacts on the natural environment.

Question 25**Consultation Questions**

- 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 from 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?

SABRE suggests answering Question 25e (*scroll down and find it after paragraph 6.100*)

Feel free to refer to the below in your response - you can copy and paste the text below and put into your own words

Policy NE4 lacks emphasis on the full range of ecosystems linked to Ancient Woodland habitats. The policy should require a broader analysis of existing ecosystems and potential adverse impacts.

Without this analysis, decision-making regarding development and mitigation is inadequate. A minimum buffer zone, given the UK's poor track record in biodiversity protection. A minimum 25-meter buffer is supported, with potential extensions based on justification. Deeper buffer zones are needed for more sensitive areas, especially considering climate change impacts like heavy rainfall.

Smaller woodland blocks under 10 hectares require deeper buffer zones of at least 50m for protection and potential habitat recovery. The ideal approach combines minimum buffer zones with case-specific adjustments, recognizing that a one-size-fits-all approach will not suffice.

Question 42

Consultation Questions

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

SABRE suggests answering Question 42c (*scroll down and find it after paragraph 8.20*)

Feel free to refer to the below in your response - you can copy and paste the text below and put into your own words

Housing design and performance must improve significantly and claims about added cost are not justified. Particularly in Wealden, where most housing will be developed on greenfield land, clear and consistent policy influences land market bids, allowing for the costs of meeting policy requirements to be factored into land purchase bids.

There are dangers in appearing to encourage converting agricultural buildings into dwellings, as it may incentivize declaring agricultural buildings redundant unnecessarily, impacting agricultural land use and sustainability.

Additionally, recent appeal decisions indicate that new dwellings should only be permitted in sustainable locations, which many agricultural buildings are not. Policy HO1 is generally supported, but it fails to address issues such as excessively high roof and large voids designed for later loft conversions. Coordination between design and housing policies is crucial to control roof dimensions and prevent later conversions to add bedrooms etc and thus not meeting housing needs properly.

Question 43

Consultation Questions

- a. Do you agree with draft Policy H02 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?

SABRE suggests answering Question 43d (*scroll down and find it after paragraph 8.26*)

Feel free to refer to the below in your response - you can copy and paste the text below and put into your own words

The application of density assessment based on the specific site and context rather than using generic minimum density ratios is supported. This is especially crucial for windfall development in small villages and hamlets. Recent instances of incongruous and inappropriate developments highlight the need for the policy to explicitly address these situations. For instance, adjustments should be made to prevent excessively small gardens in settlements to accommodate an excessive number of dwellings on a plot, preserving the settlement's character.

Question 69

Consultation Questions

- Do you agree with the Council's draft Policy DE1 Achieving well designed and high quality places?
- Have we missed anything that we should include in this policy, if so, what have we missed?
- Should we make changes to this policy? If so, what changes should we make?

SABRE suggests answering Question 69b (*scroll down and find it after paragraph 10.21*)

Feel free to refer to the below in your response - you can copy and paste the text below and put into your own words

While Policy DE1 represents progress, it falls short of addressing key design principles outlined in draft Policy HE1. These principles include contextual design elements such as setting, historical context, and urban layout. Policy DE1 lacks clarity in requiring Sussex contextual and distinctive design, opting instead for a generic "high quality and standard." The policy should make explicitly reference Supplementary Planning Document Design Guidance being prepared with public consultation, with immediate consideration for extending the existing High Weald Design Guide to all areas outside development boundaries.

There is too much formulaic and characterless housing design. Improving design would not inflate housing prices as is sometimes alleged, especially on greenfield sites. Clear design policies result in lower land prices due to market recognition of the demands of design quality standards.



You have completed the PERFECT 10! please [click here](#) to let us know you have completed your response

COMPLETE OUR RESPONSE SURVEY

