

# Wealden Local Plan Consultation

## Response Guide

Consultation period:

15th March - 10th May 2024



[Read full draft plan](#)

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# Choose the TOP 2, the BIG 5 or the PERFECT 10

There are 2 ways to respond to the Local Plan consultation.

1. By using the online portal
2. By completing a fillable PDF form and emailing it to [planningpolicy@wealden.gov.uk](mailto:planningpolicy@wealden.gov.uk)

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.

We have pre-populated the PDF forms for you to personalise and we have also given you sample text to paste into the portal to submit your response that way.

In both instances, we have suggested three options which are dependent on how much time you have to complete the response. We are calling these the TOP 2, the BIG 5 and the PERFECT 10.

## TOP 2

The main questions to respond to are relating to the Ashdown Business Park Extension and the Owlsbury Farm Neighbourhood. If you only have limited time then we advise you focus on these two as a minimum.

## BIG 5

If you are happy to continue, then stay in Chapter 4 and carry on with up to a further 3 questions. These are all relevant to the above two developments.

## PERFECT 10

For those who have time and patience, if you can complete a further 5 questions this will give a fuller response to the plan, including some areas that SABRE and SABRE-OWL generally support in the plan.

# Responding to the plan using a PDF form and email

➡ [Click here to use the PDF form with the TOP 2 questions completed for you to edit.](#)

**OR**

➡ [Click here to use the PDF form with the BIG 5 questions completed for you to edit.](#)

**OR**

➡ [Click here to use the PDF form with the PERFECT 10 questions completed for you to edit.](#)

➡ Once you have completed the form, save it as your own document on your computer.

➡ Email your form as an attachment to: [planningpolicy@wealden.gov.uk](mailto:planningpolicy@wealden.gov.uk)

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

# Responding to the plan using the online portal

- ➔ Login to the Wealden DC [consultation Portal](#)
  - ➔ See Regulation 18 Draft Local Plan section at the top and click on [GO TO EVENT](#)
  - ➔ Using the guidance in the following pages of this document, navigate to the relevant Chapter on the left hand side (the main Questions around the Ashdown Business Park Extension and Owlsbury Farm are in Chapter 4 )
  - ➔ Scroll down to the relevant question which is in a yellow box - first question in our guide is Question 4. (be prepared to scroll a lot)
  - ➔ Click on the blue text on the top right hand corner of the yellow box - [ADD COMMENT](#)
  - ➔ The first question you answer requires you to register your personal information including your email address - you will only need to complete this once. You need to agree to ALL the privacy boxes.
  - ➔ Click on [NEXT](#) and complete the relevant section - for the first question in our guide this is box b - either type your response or paste our suggested response into the box and edit to make it your own.
  - ➔ **IMPORTANT:** Scroll down and Click [SAVE](#) and you can close down the portal if you wish and come back to it later or continue to the next question. If you do not click SAVE you will lose your work.
  - ➔ If you click [SAVE](#) you will now receive an email from keystone@objective.com confirming your draft has been saved. **This email gives you a link to return to the portal and continue with your next questions. it is important to keep this email as this is the link you will need to use EACH TIME YOU return to the portal - you only receive this email ONCE.**
  - ➔ To continue directly to the next question you should click [X CLOSE FORM](#) to the right top hand corner of the response box and navigate to the next Chapter or Question you wish to respond to (remember you can refer to our guide for this. [ADD COMMENT](#) and complete the relevant section as before.
  - ➔ once you are happy with your response then click [SAVE](#) again and continue to next question. To return, find the original email from keystone@objective.com - remember to use the link in the email to return to the response if you close it down and wish to come back to it.
  - ➔ When you have completed ALL the questions you wish to then you should click [SUBMIT](#) on the final question page you are on. This is situated at the top right hand corner of the response box.
- By clicking [SUBMIT](#) you are completing your entire response and you will not be able to return to the portal again to edit or add anything so make sure you are finished before you click it. It does give you a warning box before you finally [SUBMIT](#).



[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

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

**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 future of Uckfield has not been properly master planned and thought through.

Owlsbury is a large random site put forward by the landowner.

It is the wrong side of the A22 and is not integrated with Uckfield.

Owlsbury, combined with other allocated sites and finishing building the 750 homes at Ridgewood, would increase the size of the population of Uckfield by over threequarters (from c15,000 in 2021 to c 27,000).

Infrastructure, roads and public services cannot cope.

The site is in open countryside; by the ecologically delicate water courses of the River Uck; in the Strategic Uck Valley Green Corridor; in a Biodiversity Opportunity Area; providing protected irreplaceable habitats; in a sensitive Landscape and is within 7km of the internationally protected Ashdown Forest.

The development of 2,000 homes at Owlsbury Farm would undermine the Vision of the draft Local Plan for a sustainable future.

The harm caused would outweigh the housing benefits and so the proposed allocation is contrary to national policy.

# 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**

We do need the right development in the right place and on the right scale but the answer is not the Ashdown Business Park Extension.

Ashdown Business Park Extension is not needed to supply jobs for the future Wealden population. The draft Plan already allocates enough land to do this.

Even if more industrial/warehousing land were needed which it is not, Uckfield/Maresfield is the wrong place.

Uckfield is a small town in the middle of the countryside. Such development should be in the south of Wealden on the National Strategic Road Network i.e. the A27 near Eastbourne. Local roads A272/A22/lanes cannot cope with existing traffic around Uckfield and through nearby villages.

The Business Park is 3km from the internationally protected Ashdown Forest; in a Biodiversity Opportunity Area/Nature Recovery Network; surrounded by nationally DEFRA protected and irreplaceable priority habitats and ancient woodland; and in a highly sensitive important Weald landscape. Fundamentally the wrong site for high impact development.

The proposed Business Park Expansion area is threequarters the size of all the industrial and warehouse space in Tunbridge Wells situated beside a dual carriage (A21 and motorway network). A development of this regional scale in the middle of the countryside on a poor road network is clearly wrong.

Such an expansion at Maresfield would fail to deal with the climate change and biodiversity crises. It would be contrary to the Vision of the Local Plan itself.

It would be contrary to national policy. It would harm the wellbeing of communities.

Any expansion of Ashdown Business Park is completely unjustified.

**TOP 2  
COMPLETE!**

**Scroll down to carry on with three more questions to complete the BIG 5 or please [click here](#) to let us know you have completed your response**

**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 is one of the most rural districts in the South East. The draft Local Plan doesn't take into account the bigger picture, ignoring several important points:

Wealden is surrounded by big towns such as Tunbridge Wells, Haywards Heath, Crawley, Brighton, and Eastbourne. These towns have a lot of services to offer and are well-connected by national and regional transport links. The connection of these towns to the national road network makes it easier for people to get around and connect to other places. However, apart from the the A27 around Eastbourne, Wealden doesn't have good access to this crucial road network.

Uckfield, which is right in the middle of Wealden, doesn't have the amenities you'd find in a larger town or good road links, and it only offers a limited train service. This makes it the wrong and unsustainable place for big new developments.

Research shows that any new large places for businesses to set up should ideally be near Eastbourne, where there's better road access and it's closer to city facilities, which would help reduce the need for people to commute long distances.

When it comes to building new homes, a similar approach should be used. It's better to focus development near where the existing infrastructure is already in place. The north of Wealden, particularly around Uckfield and Maresfield and near Ashdown Forest, is very sensitive in terms of wildlife and ecology, making it a challenging place for development. On the other hand, the south of Wealden is less restricted, according to the Council's information, and could be a more appropriate area for major new building projects.

The planning strategy really needs to look at the wider area and its characteristics, not just focus narrowly on Wealden by itself.

Paragraph 4.14 underlines the importance of finding a balance when it comes to people commuting out of the area for work. It's important to discourage long commutes, but at the same time, policies need to be realistic and address the actual concerns people have about where new jobs and businesses are located. Simple solutions might not fully tackle the complex issue of commuting.



**Question 7****Consultation Questions**

- 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?

**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 report on jobs and economy for Eastbourne and Wealden, done by Icen Projects in April 2022, guides decisions on where to allow new business spaces. It uses three ways to figure out how much land is needed for industry and warehouses: looking at expected economic growth in Wealden (Labour Demand), the number of jobs needed because of new homes being built (Labour Supply), and how much land has been built on in the past (Past Take Up).

The report uses the Past Take Up method to decide how much land to use in future plans.

The Labour Demand method suggests a small amount of land is needed, between 0.3 to 0.6 hectares, before making any adjustments.

The Labour Supply method points to a need for 8.7 hectares.

The Past Take Up method, which looks at past trends, suggests a much bigger need for 48.3 hectares.

However, using just the Past Take Up method doesn't take into account Wealden's countryside and environmental limits. Building as much as in the past could put too much pressure on local roads and services and use up green spaces.

A more detailed approach, that includes environmental limits, local population, and transport would be better.

By focusing on the Labour Supply method, which calculates the job needs of the future population, the land needed for industrial and warehouse spaces drops significantly to 32,057 square meters. This is a lot less than the 134,040 square meters suggested by the Past Take Up method, which is more than double the size of the current plan for expanding Ashdown Business Park.

Even though the methods show very different amounts of land needed, the Local Plan fails to balance using the Past Take Up method with the serious impact of doing so on the social and environmental wellbeing of Wealden. This mismatch should lead to a re-think of policies in the Draft Local Plan.

Choosing too much land for jobs, more than what the Labour Supply method suggests, could lead to more people commuting into the District and across the rural area, which goes against the Local Plan's goals. Also, sticking to old ways of using land inefficiently stops new and better methods from being used.

Policy SS5 plans for 84,850 square meters of space for businesses, which is a lot more than the 32,057 square meters that seems to be needed based on how many jobs the future population will likely need. This highlights the importance of a Local Plan that meets real needs in a properly balanced way, and is sustainable.

**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 already sets aside enough land for businesses, meaning there's no need to allocate more land.

It suggests that we can fit more workspaces into these areas by designing smarter buildings that take up less space and cutting down on the amount of parking.

When talking about the main roads in the area, paragraph 4.68 misses out on discussing good east west routes like the A27 and poor ones like the A272.

For businesses that need to store and move goods, it's crucial to be near good roads. This makes locations near the junction of the A22 and A27 better choices than those near the A272 because they have better road links and are closer to the facilities and services in Eastbourne.

The fact that Wealden is a rural area surrounded by big towns needs to be remembered. These towns have lots of services and are well-connected to wider transport networks, unlike Wealden, which has fewer services. Uckfield, because it is more isolated, isn't a good fit for big industrial or housing projects. Instead, any new business land should be near Eastbourne in the south, where it can benefit from good road access and being close to town amenities.

When deciding where to build new homes, it's important to consider that the northern part of Wealden has more delicate landscapes and wildlife, making the southern part a better choice for development.

In summary, putting large developments in the north of Wealden would cause more harm, highlighting the importance of planning that looks at the bigger picture of the region's layout and nature, instead of just focusing on Wealden by itself.

**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 should be 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 emphasise 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 should be supported, 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 is insufficient. A minimum 25-meter buffer zone 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 should be 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

- 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?

**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**

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