

Guidance note for making a representation to challenge the suitability of an allocated site in the Reg. 18 draft Wealden Local Plan

1. Introduction

The Draft Local Plan¹ published for a consultation ending on 10 May 2024 plans for a minimum of 15,729 houses and two new employment areas. This housing total, when averaged over proposed plan period of 16.5 years to 2040, requires 953 houses to be build each year. This compares to an average of 643 houses/year built over the last 16.5 years.

The consultation provides an opportunity to provide feedback to Wealden about the proposed policies in the plan and WGOD recommends that a response is made to as many of the 85 sets of questions in the Draft Local Plan document as possible.

The additional houses will result in an increase in population in the District. Due to its age demographics and a falling birthrate, the natural rate of population change in Wealden is negative i.e. the existing population is shrinking, but additional housing will result in a population increase as more people move into the District than move out, clearly facilitated by the additional housing being built.

Planning authorities are required to assess their so-called local housing need (NB. this is not the housing need of local people) by use of the government's standard method formula. For Wealden, this formula requires 1,200 houses/year. Currently, Wealden is unable to achieve this figure in the plan as not enough suitable land has been put forward for development. However, this could well change as concurrent with this consultation, Wealden is undertaking a further Call for Sites exercise. Furthermore, whereas a considerable number of sites submitted for development have been deemed unsuitable, the site's promoter has been asked to challenge these reasons where they are able.

¹wealden.gov.uk/UploadedFiles/Full-Draft-Local-Plan-Accessible-Version-RGB-2.pdf

Of the currently proposed 15,729 new houses to 2040:

- 8,113 have already been granted permission, but as at October 2023 have yet to be built.
- 2,000 are assessed to be provided on small unallocated sites known as windfall sites, and
- 5,616 are to be provided across 101 specified sites called allocation sites.

WGOD consider that some of these allocation sites (between 6 and 750 houses) are contentious and the purpose of this guidance note is to provide suggestions on how any allocation site may be challenged.

A list of the towns or parishes with allocated sites or potential windfall sites can be found at pages 71 & 72 of the draft local plan.

Supporting this draft plan is a considerable (enormous!) amount of evidence that underpins the findings and conclusions. WGod consider that the most effective way of challenging say, a site considered suitable for a housing allocation, is to show where some of the evidence substantiating the suitability of that site is incomplete or incorrect. Local knowledge is an important part of this process.

Understanding fully the reasons why a specific site has been considered suitable as an allocated site involves a substantial amount of reading of the voluminous supporting information. Whereas a response to the consultation that states that a certain site is not suitable as an allocation, can be made without any knowledge of the supporting information, that feedback is likely to be far less effective than feedback which shows where the underlying evidence base is incorrect or incomplete. This approach will first require an understanding of that evidence base.

Chapter 13 on page 360 of the Draft Local Plan deals with the site allocations and it is suggested that this chapter is read in full before considering compiling a response to an allocation under question 85 b):

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.

In this note, a brief explanation will be given of the site selection process used in the draft plan, followed by a critique of the sustainability appraisal of an example site in Westham that has been deemed suitable to be included within the plan as an allocated site.

Appendices have been included at the end of this note for:

Appendix 1 - How to submit a response to this consultation.

Appendix 2 - Which sites have been allocated

Appendix 3 – Development options considered

Although this guidance note is intended to assist those wishing to object to an allocation (Question 85 b) on page 380 of the plan), there is far more to the local plan than just the proposed housing and employment allocations. WGod would encourage responses to as many of the 85 questions as possible.

It is also important to respond confirming agreement to any policies considered helpful, but it is important to fully read the supporting information to any policy before doing so.

2. Site Selection Methodology

Wealden has compiled a Site Selection Methodology² Topic Paper, Conclusions³ and Appendix⁴ which together, set out the means by which certain sites are deemed suitable for development and included within the local plan as an allocation.

Site selection is undertaken by a five-step process which is set out in Chapter 4 (pages 10 – 27) of the Methodology paper.

The initial step in the process is the Strategic Housing and Economic Land Availability Assessment (SHELAA)⁵ and its Appendix 4⁶. The SHELAA provides a high-level assessment of the potential of all the sites submitted for development. Many sites are eliminated as unsuitable at this stage.

Following stages 2 – 5, sites still deemed suitable are considered as 'reasonable alternatives' and progress to the sustainability appraisal stage. In this process, sites are considered against the 20 Sustainability Objectives detailed in the Scoping Report⁷ and Appendices⁸.

² [Site-Selection-Methodology-March-2024.pdf \(wealden.gov.uk\)](#)

³ [Site-Selection-Conclusions-Report-March-2024.pdf \(wealden.gov.uk\)](#)

⁴ [Site-Selection-Conclusions-Report-March-2024.pdf \(wealden.gov.uk\)](#)

⁵ [SHELAA-Main-Report-February-2024.pdf \(wealden.gov.uk\)](#)

⁶ [SHELAA-Appendix-4-Parish-Summaries-February-2024.pdf \(wealden.gov.uk\)](#)

⁷ [Sustainability Appraisal - Wealden District Council - Wealden District Council](#)

⁸ [Appendices-For-Website-January-2024-V2.pdf \(wealden.gov.uk\)](#)

3. Sustainability Appraisal⁹

It is considered that the Sustainability Appraisal part of the site selection process provides the greatest opportunity to challenge the suitability of a site to be considered an allocation.

The Sustainability Appraisal, together with its five volumes of Appendices, form a massive set of documents. However, it is recommended that the Non-Technical Summary at page one of the Appraisal is read as this provides a concise explanation of the appraisal process.

The Sustainability Appraisal process is intended to promote sustainable development in plan preparation by assessing the extent to which a Plan and its policies, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The process will also help to ensure that the proposed policies and site allocations provided in the Local Plan are adequate and proportionate.

The Sustainability Appraisal tests the Local Plan against sustainability objectives and identifies and reports on the likely significant effects of a plan's policies and proposals. The Sustainability Appraisal should ensure that the policies and proposals contained in the Local Plan contribute to the aims of sustainable development.

The Sustainability Appraisal has been carried out in the form of a matrix and includes the identification of potential mitigation measures. The Sustainability Appraisal predicts and evaluates the likely significant effects including:

- Short, medium and long-term effects
- temporary and permanent, direct and indirect effects
- cumulative or synergistic effects
- consideration of mitigation measures
- proposals to monitor the effects of the Plan.

Each plan measure e.g. policy, or allocation site, is assessed against the 20 Sustainability Objectives and scored throughout the appraisal process as either:

⁹ [Initial-Sustainability-Appraisal-March-2024.pdf \(wealden.gov.uk\)](https://www.wealden.gov.uk/initial-sustainability-appraisal-march-2024.pdf)

Major Positive	
Minor Positive	
Uncertain	
Minor Negative	
Major Negative	
No Significant Impact	

Most importantly, a commentary is provided alongside the scoring to explain the results.

It is this commentary that it is suggested be examined for accuracy, for completeness and for compatibility with the score given. For any areas that are not considered correct, reasons why should be included in a response to this consultation and an adjustment made to the score if necessary.

4. Critique of the Sustainability Appraisal for an allocated site

In this guidance note, a site in Westham allocated for 150 houses will be used as an example of the steps to take to show where it is considered that the appraisal of a site is flawed and it should not be considered suitable as an allocation.

Note: in the section in the Non-Technical Summary about Proposed Site Allocations, there is an error in the text. Paragraph N50 on page 11 states: “The detailed appraisals for the sites are set out within Appendix A11”. This is not the case, Appendix A11 (in two volumes) contains only the summary of the site selection appraisals. The detail i.e. the Full Sustainability Appraisals are contained in a separate section of Wealden’s website¹⁰ where there are 11 volumes covering the Local Plan policies and 31 volumes for the site appraisals, one for each town or parish.

The Westham site used in this guidance note as an example is SHELAA ref. 1099/3360 Land at Peelings Lane, Westham. The SHELAA high level assessment for this site can be found at pages 623/4 in Appendix 4¹¹ of the SHELAA. The Sustainability Appraisal assessment for this site is on pages 162 – 177 of the full assessment for Westham¹².

A typical page from this assessment looks like:

¹⁰ [Full Sustainability Appraisal Assessments - Wealden District Council - Wealden District Council](#)

¹¹ [SHELAA-Appendix-4-Parish-Summaries-February-2024.pdf \(wealden.gov.uk\)](#)

¹² [Westham.Reg-18.pdf \(wealden.gov.uk\)](#)

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

Draft Wealden Local Plan (Regulation 18) for Local Plan Sub Committee

Whilst the summary page showing the scores against each of the 20 sustainability objectives, looks like this:

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

Draft Wealden Local Plan (Regulation 18) for Local Plan Sub Committee

The commentary on the summary page continues and concludes with the reasons for either selection of the site as suitable to be an allocation, or a rejection.

Below is a worked example of a partial critique of Wealden's reasons that consider this Westham site 1099/3360 suitable for an allocation of 150 houses. Comments have been made against those bullet points in the Commentary from the full assessment that it has been considered that the information is inaccurate and/or incorrect. Similarly, information from any relevant appeal decisions have been added that it is considered are material in assessing the site's suitability.

SHELAA Ref 1099/3360

Site: Land at Peelings Lane, Westham

Page	Objective	Bullet	SA Commentary	WGOD Comments
162	SO1	2	The site is 32.49ha in size.....	The site deemed suitable for development is not 32ha but only 6ha. Thus it should be the attributes of this 6ha site that is assessed against the sustainability objectives, not the 32ha site.
162	SO1	4	The nearest bus stop is approx. 100m from the site on Peelings Lane and provides a frequent and regular bus service to the larger settlements of Eastbourne and Hailsham	Frequent and regular is too positive, whereas buses to Eastbourne are approximately hourly, there are only two buses a day to Hailsham. There are no services to either Eastbourne or Hailsham on a Sunday.
162	SO1	5	The site is located approximately 300m from the nearest train station in Westham	The closes point from the 32ha site to the station is 400m in a straight line but walking from this closest point to the station is 640m. However, the distance to the station from the potential 6ha site access point onto Peelings Lane is 1,120m although the site extends a further 300m northwards. Thus, the walking distance from the centre of the site to the station is 1,270m, well beyond the maximum 400m recommended by SUSTRANS and 800m by CIHT.

162	SO1	7	The site complies with the overall Spatial Strategy for the district as it is located within a sustainable settlement and within close proximity to sustainable transport.	Within a sustainable settlement is inaccurate - this allocation is outside the current settlement. It is not in close proximity to the rail service, but 1,270m away.
163	SO1	2	All development will result in an increase in greenhouse gas emissions and therefore a minor negative impact is expected overall.	The short-term impact on climate change has been assessed as minor negative. This cannot be correct if the carbon impact from the construction phase is considered. That it hasn't, is a major omission. As we need to reduce emissions to get to net zero, any measures that results in an increase to emissions cannot be considered a minor negative – this should be scored as a major negative.
164	SO3	7	The promoter has indicated as part of a vision document that development would.....	This is one of several references to the promotor's vision document. Should not this document be made available to the public if it is being relied upon in this SA? The promotor is not a developer or housebuilder and so will not be developing this site. Thus, the promotor's vision document has no standing and should not be considered in this appraisal. Unless there is a site-specific allocation policy requiring provision of whatever measures are in the promoter's vision, which there is not, then these measures should not be considered in this appraisal.
164	SO3	8	The promotor has also indicated that a wetlands area would be created.....	Unless a policy requires this site to have a wetlands area, that the promotor has indicated one will be provided cannot be considered to be deliverable.

164	SO3	10	Given that the site is at risk of flooding from multiple sources, but that suitable mitigation has been demonstrated via proposals.....	These promotor proposals should not be given any weight as they have no legal standing. This site's promotor is highly unlikely to develop this site. Any identified flood risk should be managed by policies. Flood risk should currently be assessed as uncertain, not, not significant.
165	SO4	2	A watercourse (Martins Ditch and Gut) forms the northern boundary of the site.	Whereas the watercourse running down to the Pevensey Levels forms part of the northern boundary of the 32ha site, it runs through the middle of the two fields of the 6ha site identified in this draft plan for development.
165	SO4	4	The promotor has indicated that a three stage system to ensure there are no adverse impacts to the local water system and Pevensey Levels	As for the comments above, whatever this promotor has indicated should have no bearing on the sustainability appraisal of this site given that the promotor's indications have no standing. The Pevensey Levels are afforded statutory protection and it would be illegal not to take measures to avoid an adverse impact.
165	SO4	8 and development would potentially impact upon its [the watercourse] quality, the promotor has indicated that this will be mitigated	The conclusion of no significant effect for SO4 appears to be relying on measures offered by the site promotor. As stated above, the delivery of these measures cannot be guaranteed without the imposition of site-specific policies, the absence of which mean that these measures should form no part of this SA. Thus, a more accurate conclusion for this objective would be uncertain at best.
			and therefore there is no significant effect on this SA Objective	

166	S07	1	The majority of the site (western half) is within an area classified as being darker in CPRE's light pollution mapping	As it is only the two westernmost fields being assessed as suitable for development, then the entirety of the development area is within the dark skies area. Introduction of housing into a darker skies area would be an adverse impact.
166	S07	3	Westham lies in very close proximity to Eastbourne	It is agreed that with Eastbourne's growth, it is now very close to Westham but Eastbourne town centre is five miles from this site, which cannot be considered as close proximity. However, it is questioned why this proximity comment has any relevance to S07.
166	S07	3	Westham is classed as a local service centre.....	No relevance to S07
166	S07	4	The site is approximately 500m from the nearest train station....	No relevance to S07
167	S07	2 there is likely to be a significant increase in traffic and congestion on the road network although this may be mitigated by some degree through the provision of services and facilities on the site.....	Although this site is being taken forward for 150 houses, not 400, locally, this will still result in a large increase in traffic. Whatever services and facilities have been offered by the promoter, any benefit cannot be taken unless these services and facilities are required by a site-specific allocation policy. As there is no policy, no benefit can be taken forward into this appraisal. Thus, there will not be any resulting decrease in traffic.

167 S07 3 Transport surveys and modelling will be required to ascertain the impact on the road network and identify mitigation measures.

The Core Strategy allocated 650 houses to Stone Cross and ESCC identified that mitigation measures would be necessary at the Stone Cross crossroads. However, despite these 650 houses having all been constructed and occupied, ESCC has yet to identify and implement any mitigation. Furthermore, construction of an additional 500 houses is underway with a further 362 having received permission. This draft plan is proposing a further 448 houses for the parish.

Whatever mitigation solution would have been suitable for the Core Strategy 650 houses, may potentially be inadequate for the additional 862 houses under construction or with permission. Clearly, should the proposed 349 allocation in this draft plan together with the 99 windfalls come forward, this will total an additional 1,310 houses on top of the Core Strategy 650.

The commentary talks about "identify mitigation measures" but it is suggested that the identification of measures is totally inadequate – what is needed is the implementation of the mitigation measures. Implementation requires measures to be identified, to be designed, to be funded and then delivered – it is only then that the pollution from the congestion will be mitigated.

Furthermore, the Core Strategy development resulted in long westbound queues on Dittons Road at the A22 Golden Jubilee Way roundabout in the morning peak. This issue was not identified in the Core Strategy and although a "solution" has now been identified by ESCC, when it will

be implemented is unknown as funding has not been obtained. But whether this solution will accommodate the large increase in traffic arising from the post Core Strategy development is also unknown.

Thus, the proposed minor negative score for this site should be changed to a major negative.

167	SO8	1 & 2	The mature hedgerows and trees within the site and along its boundaries..... Development would need to seek to retain and enhance the existing hedgerows and trees on the boundaries to maintain and enhance the green infrastructure network	It appears that there is no intention to seek to retain the internal hedgerows and trees, the lack of which would considerably degrade the green infrastructure network. The loss of the internal hedgerows and trees would be a permanent major negative.
168	SO8	1	Any development would need to provide a minimum 20% biodiversity net gain (BNG) on site.....	The government has stated that any increase in the statutory minimum 10% BNG would need to be fully justified. No justification for the 20% has been provided meaning that there is great doubt whether this measure will survive the examination of the plan.
168	SO8	2	The promoter for the site has indicated a significant range of measures to provide and	As stated above, stated intentions by a site promoter cannot be given any weight as there is no mechanism short of a specific allocation policy, to guarantee that the enhancements will be provided.

			enhance green and blue infrastructure....	
168	SO8	4however, over the longer term major positive effects are expected as green and blue infrastructure is enhanced	As the enhancement currently is unable to be required or enforced, any resulting benefits cannot be considered as weighing in favour of this site as an allocation. Furthermore, the green and blue infrastructure is being offered based on developing the 32ha site and it is not known whether it will be part of the smaller 6ha development. At best, the effect of this site on SO8 cannot be considered as a major positive but at best, it can only be uncertain.
169	SO9	5	Any development would need to provide a minimum 20% biodiversity net gain (BNG) on site.....	The government has stated that any increase in the statutory minimum 10% BNG would need to be fully justified. No justification for the 20% appears to have been provided meaning that there is great doubt whether this requirement will make it through the examination.
169	SO9	6	The site is located partially within the Pevensey Levels BOA. Development could adversely impact on the objectives of the BOA	Agreed. But quite how this potentially negative impact can be assessed as a major positive for biodiversity has not been explained. At best, the score should be uncertain.
169	SO9	7and ensure mitigation measures are implemented to avoid harm	Without identifying the feasibility, practicality and effectiveness of these unknown mitigation measures, the major positive assessment is clearly wrong. It should be uncertain at best.

170	SO9	1	<p>The promoter has indicated as part of the vision document that assuming the grassland in any new country park are managed a BNG of over 20% could easily be achieved across the site.</p>	<p>There are two major issues with this assessment:</p> <ol style="list-style-type: none"> 1. A country park appears to have been offered by the promoter as part of the development of the 32ha site. That it is now proposed to limit development to just 6ha casting great doubt on whether the country park will still be provided for this much reduced area of development. 2. No weight should be afforded to a promoter's vision document unless it is proposed to include the offered measures as part of the policy for this site. As there is no site-specific policy, the contents of the vision document should be ignored in this appraisal.
170	SO9	2	<p>Therefore, a minor negative effect is likely in the short to medium term as the site is developed, however, over the longer term major positive effects are expected.....</p>	<p>These major positive effects are very unlikely to occur for the reasons given above and the effect on SO9 from developing this 6ha site is most likely to remain as minor negative.</p>

169

SO10

1

The 2023 Landscape Sensitivity Assessment states that the site landscape is moderately to highly sensitive It is considered that landscape impacts in the central and eastern portions of the site are substantial and it would not be appropriate to deliver housing in this part of the site. There are two fields in the south western portion of the site that are well screened by existing landscape features and the visual impact of the development would be more limited in these locations.

It is agreed that landscape impacts of developing the central and eastern portions of the site would be severe and inappropriate. However, this also applies to the two westernmost fields also which cannot accommodate development without substantial harm to the landscape. Development would considerably erode the rural character and appearance of a large part of the surrounding area.

There are three relevant appeal decisions [**provide refs.**]- one for the southern part of the westernmost field, one for development immediately south of Peelings Lane adjacent to the SW corner of the site and one a few hundred metres away to the west. A major reason for all three appeals being dismissed was the unacceptable impact of these (much smaller) developments on the rural landscape [**include relevant findings from these three appeals**]. Any development of the 6ha site would be highly visible from Peelings Lane and development would impede views from the lane to the Pevensey Levels beyond. This 6ha site would also be highly visible from footpath Westham 30 to the west of the site and Westham 5c to the east. Development would also restrict views of Pevensey Castle from footpath Westham 30. As currently the majority of the urban area of Westham is largely hidden from views from the Levels to the north by the Peelings Lane vegetation, this would not be the case for this development, which would be highly visible and intrusive in the landscape. The urbanised site would be also visible from the A27 to the north.

69	SO10	2	<p>Given the above reasons, it is considered the effects on this SA Objective are minor negative. However, development within the SW parts of the site would be more enclosed and capable of accommodating development.</p>	<p>The minor negative assessment for the 32ha site is far too positive. As well as the issues outlined above, the 32ha site would be highly visible in the landscape, drastically urbanising the current rural character. This new urban area would be highly visible with long distant views from much of the Pevensy Levels and also from Pevensy Castle. For this 32ha site, the effects on SO10 would be a major negative.</p> <p>The 6ha site would also be intrusive in the countryside, with the built form extending extensively northwards beyond the natural boundary of the urban extent of Westham limited by Peelings Lane. Thus, the effect of developing this 6ha site on the landscape would be major negative.</p>
----	------	---	--	---

To be completed for sustainability objectives SO11 – SO20.

Summary – Land at Peelings Lane, Westham

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

Conclusion for site 1099/3360 Land at Peelings Lane, Westham

Due to the above information, [pick out a couple of the strongest examples] it is considered that the current Sustainability Appraisal for this site 1099/3360 is flawed. With the necessary corrections/additions it is clear that development of this rural site is unsustainable. Thus, this site should not be included in the local plan as an allocated site.

Appendix 1 – How to respond to the consultation

The consultation page¹³ on Wealden’s website contains a link to a Guidance Note¹⁴ which explains how to register and submit a response to the consultation.

All other information regarding the local plan is available from the consultation page. A link is provided to the consultation portal whereby submissions in response to the consultation questions may be uploaded.

The Draft Local Plan document contains a question after every policy seeking feedback on that policy.

A response about any site allocation should be made to question 85 in Chapter 13 Site Allocations on page 380 in the PDF copy of the draft local plan.

It is considered that the best way to submit a representation(s) is via the consultation portal. On the right-hand side of the local plan consultation home page¹⁵, is a blue button titled “Go to Event”. Pressing this takes the reader to an electronic version of the local plan. After every policy, (highlighted in green) is a set of questions (highlighted in yellow).

At the top right corner of every set of questions is an ADD COMMENT button which leads to a page where a submission can be made. Information can be typed directly into the box, but it is suggested that the response is compiled first in say, Word and then pasted into the box.

For the electronic version of the plan on the consultation portal, Policy SA1 and Question 85 can be found in Chapter 13 after paragraph 13.24.

The questions asked are:

Question 85

Consultation Questions

- 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.*

¹³ [Wealden \(Regulation 18\) Local Plan Consultation - Wealden District Council - Wealden District Council](#)

¹⁴ [Guidance-Notes-V5.pdf \(wealden.gov.uk\)](#)

¹⁵ [Regulation 18 Draft Local Plan - Details - Keyplan \(wealden.gov.uk\)](#)

- 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?*
- f) The Council has prepared a site selection methodology which has informed the site selection process. Do you agree with the site selection methodology that has been used?*
- g) Should the approach to the site selection methodology be changed, if so, how do you suggest the methodology should be changed and why*

Clearly, the seven questions cover far more than just the suitability of the allocated sites, which would be answered under b).

Appendix 2 – Which sites have been allocated?

All sites that are considered suitable for an allocation are listed in Policy SA1 on pages 373 – 380 of the Draft Local Plan¹⁶.

Should the location of the site not be clear from the description, it is suggested that the policy map¹⁷ for that settlement is looked at where the allocated sites are coloured in pink

Every site submitted to Wealden for consideration as a development site is detailed in Appendix 4¹⁸ of the Main Strategic Housing and Economic Land Availability Appraisal¹⁹ (SHELAA). This document contains a high-level appraisal of all the submitted sites.

The sites that make it through the SHELAA process and are then considered potentially suitable for an allocation are listed by their SHELAA reference in the Full Sustainability Assessments²⁰ for each settlement.

¹⁶ [Full-Draft-Local-Plan-Accessible-Version-RGB-2.pdf \(wealden.gov.uk\)](#)

¹⁷ [Local Plan Consultation - Available Downloads - Wealden District Council - Wealden District Council](#)

¹⁸ [SHELAA-Appendix-4-Parish-Summaries-February-2024.pdf \(wealden.gov.uk\)](#)

¹⁹ [SHELAA-Main-Report-February-2024.pdf \(wealden.gov.uk\)](#)

²⁰ [Full Sustainability Appraisal Assessments - Wealden District Council - Wealden District Council](#)

Appendix 3 – Development options considered

Seven options for additional housing and employment on allocated sites have been considered and tested in this draft plan. These allocated sites will provide around a third of the new housing to be built to 2040 with the remainder either already having received planning permission (8,113) or be built (2,000) on small windfall sites. The options considered are:

Spatial Option A: To maximise growth in all locations within the District to meet the Council’s housing and employment needs requirement.

Spatial Option B: To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the district (i.e. Eastbourne and Royal Tunbridge Wells)

Spatial Option C: To focus growth outside of the High Weald AONB, within and around sustainable settlements in the Low Weald (i.e., Uckfield, Hailsham, Polegate and Willingdon and other villages)

Spatial Option D: To focus growth on the delivery of new strategic extensions at existing sustainable settlements. Continue to support growth through windfalls at those settlements

Spatial Option E: To maximise growth in all locations within the district to meet the Council’s housing and employment needs requirement and to meet a small proportion of Eastbourne’s unmet housing need.

Spatial Option F: To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the district (i.e. Eastbourne and Royal Tunbridge Wells), with limited employment growth.

Spatial Option G: Combined Option of Spatial Options B and D

Currently, Option F is the preferred option.

Summary of considered spatial options

Spatial Option	Housing	Employment	W GOD Comments
A	10,116	140,750m ²	Includes 2,000 houses at Owlsbury Farm, 2,500 houses at West of Hailsham and 60,000m ² at Ashdown Business Park
B	5,616	140,750m ²	Includes Ashdown Business Park extension
C	4,817	140,750m ²	Includes Ashdown Business Park extension
D	5,360	140,750m ²	Includes Ashdown Business Park extension
E	11,046	140,750m ²	Includes Owlsbury Farm, West of Hailsham and Ashdown Business Park
F	5,616	60,750m ²	At March 2023, this is the option favoured by Wealden
G	7,616	140,750m ²	Includes Owlsbury Farm and Ashdown Business Park extension

Note: the totals in the housing column above represents that proposed for allocated sites and exclude the 8,113 houses with permission and 2,000 windfalls.

It is quite conceivable that as a result of either the feedback from landowners and developers to this consultation, and/or the current Call for Sites exercise, that Option F may no longer be considered as the preferred option but one of the others above or even a new option selected. The ongoing Call for Sites may provide other sites deemed suitable for development, which would increase the housing numbers above. Currently, the Council considers Options A, C & E to be not suitable and these will not be considered further. However, it intends to explore further Options B, D & G, together with F during the period leading up to Reg. 19.