

TACKLING CLIMATE CHANGE

Direction of travel policy options:

As part of our local plan we will consider the following:

1. Delivering improvements in energy efficiency for new and existing developments;
2. Facilitating the provision of water efficiency and renewable energy installations in developments;
3. Facilitating the provision of decentralised energy networks and renewable energy developments;
4. Encouraging active and sustainable transport to improve air quality and reduce carbon emissions including the provision of walking and cycling infrastructure within major new developments;
5. Encouraging ULEV network and infrastructure;
6. Enabling carbon sequestration / storage in appropriate locations and as part of developments;
7. In liaison with partners, encourage and seek measures to help manage flood risk and deliver suitable sustainable drainage systems as part of developments;
8. Safeguard land to deliver sufficient water storage capacity (i.e. increasing reservoir capacity at Arlington);
9. Implementing parking standards for development; and
10. Ensuring that new development is designed to consider climate change from project inception, taking account of the whole life of the development.

Are there any issues or challenges that we have missed?

Population growth versus Climate change as a formulaic model, and the considerations arising.

Reduction and minimisation of travel, especially commuting. A public transport infrastructure potentially involving extended rail networks and climate friendly buses.

Low carbon and low energy housing standards, i.e. that sustainable and carbon zero construction is the norm.

Do you agree with the proposed policy options?

As long as they are actively pursued.

Sentiments are good but do not necessarily go far enough

Encouraging active and sustainable transport within major new developments is not good enough; it is the transport *between* developments and *within* towns that should be the policy objective.

Do you disagree with any of the options?

Option 6 (Enabling carbon sequestration / storage in appropriate locations and as part of developments) is a nonsense and should be removed.

4.22 Describes 'modelling the impacts of transport growth' and 'understanding the transport improvements that will be required' – but 2.14 admits that the district is an overall exporter of labour.

The average house in Wealden is over 5 miles from a railway station, there are scant bus services serving villages and smaller towns; only ESCC can provide better public transport links so it is futile for Wealden to 'study' any alternative to the motor car.

Are there any other policy options we should be considering?

With regards to SUDS systems should there be a standard scheme and agreement for adoption by Southern Water? Many people are concerned about the possible failure of management of these systems in the future which could have a significant impact on environment

Community Energy Projects

Do you have any other comments in relation to how we can plan to combat climate change?

Building only the number of properties required and no more - pushing back on unrealistic government housing targets.

Insisting on zero carbon construction as far as national building regs permit. Lobbying government for improvement in national building standards.

WDC needs to be the custodian of our natural environment.

Development of brown field sites should be the absolute priority. We should certainly not be building on AONB land, sites of scientific interest, or other sites of import for our natural heritage, which are also vital in the struggle against climate change.

Developing more dwellings than are necessary or sustainable in a predominantly rural area that is dependant on outward migration to reach employment, can only be predicted to increase the level of car use.

INFRASTRUCTURE TO SUPPORT GROWTH

We are considering the following policy directions:

- To help create sustainable communities and reduce the need to travel by private motor vehicle, planning policies will support development by ensuring that the right infrastructure is provided in sustainable locations at the appropriate time;
- Planning policies will seek to promote the use of sustainable transport modes (i.e. walking, cycling and public transport) and will favour development in locations where existing sustainable transport routes are in place (or where this can be provided);
- Planning policies will seek to direct new development allocations to sustainable locations and to be designed to support sustainable modes of transport, as well as provide suitable vehicular accesses and parking;
- Planning policies will support the provision of new social infrastructure where it is needed;
- Planning policies will support the provision of new education infrastructure in locations where it is most needed to meet the requirements for school places;
- Planning policies will support the provision of new telecommunications infrastructure where it is required;
- Planning policies will support the provision of new health infrastructure (particularly GP surgeries) where it is most needed;
- Continue to have firm planning policies that seek to resist the loss of existing facilities (i.e. public houses, village shops, community halls) where possible;
- Allocate sites for social and community uses to meet the needs identified by Wealden District Council and/or other infrastructure providers and to aim to locate these where they are most needed and within walking distance;
- Continue to consider the impacts of large new developments within Wealden and the impact they have on existing social and community infrastructure within towns/villages;
- If required, subject to Government planning reforms, the Council will seek to review its CIL Charging Schedule by the end of 2023 to ensure that new development is making an appropriate contribution to infrastructure provision; and
- The Council will progress an overall assessment of the financial viability of new development contained within the Local Plan to support the

Are there any issues or challenges that we have missed?

There needs to be emphasis on development not taking place before infrastructure is in place. The mantra of infrastructure following development due to funding flow is not in reality materialising. Grampian conditions are needed in more locations

5.4 refers to 'modal shift' and goes on to describe cycling/walking' and 'public transport'. Does anyone seriously believe that these are practical solutions for the majority of what is a predominantly rural District made up of small towns or villages (even Wealden demonstrated its disbelief in such an approach by trying to limit development to protect the pollution levels on the Ashdown Forest)

5.6 refers to the 'necessity to deliver' (schools, GP surgeries, etc.) facilities – but these are completely beyond the Council's control. To plough ahead with the volume of house building proposed without the assurance that these are definitely available would be folly (5.11 goes on to confirm the Council's lack of control over other key infrastructure issues such as waste water, water etc.

Do you agree with the proposed policy options?

Directing development to 'sustainable locations' will concentrate development in fewer places and favour large developments.

These policy aims would be laudable, except for the fact that so many infrastructure improvements have failed to materialise despite the promises made during planning processes. WDC must take up a joined up approach to district-wide planning. Infrastructure needs should be considered BEFORE planning permission is granted. It is not acceptable to grant more and more planning permissions on the basis of infrastructure promises that never materialise.

Do you disagree with any of the options?

Assuming that 'key local stakeholders, strategic transport providers and developers' will provide the scale of infrastructure required is, frankly, a dream (junction improvements stated to be essential for Hailsham in the 1998 Wealden Local Plan have still to be commissioned, yet hundreds of additional houses have nevertheless been consented).

Are there any other policy options we should be considering?

Increase in required parking provision, which in new developments can be clearly seen to be inadequate and new developments are very congested with parked cars.

Do you have any other comments in relation to how we can support the delivery of infrastructure within Wealden?

Where possible, setting aggressive build-out rates to increase funds for infrastructure. Provision of services like public transport are unsustainable where new developments build out slowly and do not provide sufficient traffic and revenue to providers

Infrastructure planning should be preceded by careful planning of the needs of the community in Wealden. What is needed to make sure our residents have the highest possible quality of life, whilst ensuring environmental sustainability.

The only way of providing the infrastructure needed – whether access to employment, schools, etc., would seem to be to plan future development in large scale (i.e. new towns or garden villages) rather than piecemeal. If the current excessive strain on already congested towns such as Hailsham or Uckfield is to be eased, this suggests that the new town model may be a viable way forward.

Creation of local “work hubs” (for example conversion of underused public houses etc) to create “hubs” for local people to be able to work “local but not at home”

HOUSING PART 1

Direction of travel policy options

As part of our Local Plan we will consider the following:

- The provision of a clear strategy to bring sufficient land forward at a sufficient rate to meet our housing target and delivering these in the most sustainable locations for growth, taking into account land constraints and limitations;
- To provide planning policies that seek to both allocate and support the delivery of a mix of housing sites in the district, including those from small-to-medium sized house builders, to ensure housing delivery over the entire plan period;
- If required, we will seek to provide housing requirements for designated neighbourhood areas which reflects the Council’s overall planning strategy for the pattern and scale of development;
- Encouraging the delivery of a range of housing to meet the needs of different groups of the community including increasing specialist accommodation, retirement / sheltered housing, residential and nursing care homes, accessible and/or adaptable homes;
- Improve opportunities for self-build or custom build housing, community-led housing and build to rent;
- To maximise opportunities to deliver on brownfield sites where possible, particularly within existing towns and villages, that benefit from existing infrastructure provision and can achieve higher densities;
- Encouraging the right types, sizes and tenures of housing within the district to meet our community’s changing needs;
- The new Local Plan will ensure that new housing development will be developed at appropriate densities, that accessibility standards (i.e. lifetime homes) and space standards are also appropriate to ensure good quality development;
- To provide planning policies that consider the appropriateness of converting rural buildings for housing, the development of single dwellings in the countryside and the redevelopment of existing housing stock; and
- To safeguard existing gypsy, traveller and travelling showpeople sites from redevelopment to other uses and to meet the future accommodation needs of gypsies, traveller and travelling showpeople as part of the new Local Plan.

Are there any issues or challenges that we have missed?

The Council should be robustly challenging the housing targets imposed by Central Government, which should reflect the need within the area, not some algorithm apportioned by dictat:

How do we plan for a 36% increase in housing stock versus a predicted 10-11% increase in population over the next 20 years?

Do you agree with the proposed policy options?

Yes in principle. The initiative to improve opportunities for self-build or custom build housing, community-led housing and build to rent are welcomed. This should be written into planning policy in a way that means this will actually happen.

Do you disagree with any of the options?

The statement 'The most sustainable locations for growth' is an oxymoron.

'Housing delivery' (6.2) is prioritised over all other considerations; we can see this through the wave of consents that the Council has granted since the local plan was rejected, HOUSING PART 1 many in the AONB.

Notwithstanding the constraint implied by the High Weald AONB (6.25) on the growth of Crowborough and Heathfield, the statement 'A key issue.... Is the delivery of new homes in these sustainable locations' implies a direct conflict, with the suggestion that AONB policy needs to be overridden if 'such towns are to prosper'. There is every reason to believe that Crowborough and Heathfield are quite capable of 'prospering' without having to have 'new residents'.

Are there any other policy options we should be considering?

A more robust protection against any development being allowed in Areas of Outstanding Natural Beauty There could be a condition requiring build-out within five years of a consent being granted (i.e. not simply an 'effective commencement')

Do you have any other comments in relation to how we can plan to deliver housing, including the range, type, size and tenure?

The current developer led approach to does not produce the mix of housing that is actually required – developers will fight to develop what is profitable which generally means 3 and 4 bedroom houses on flat green field sites. More robust policies need to be in place to produce the dwellings that are actually needed as has been identified already – i.e one and two bedroom homes that are affordable to young people and in areas where they are actually needed.

HOUSING PART 2

Direction of travel policy options

As part of our local plan we will consider the following:

- Providing a policy that requires a minimum threshold for affordable housing provision for all major housing development sites;
- Establishing clear priorities for genuinely affordable family homes for rent or homeownership, including percentages for the types of affordable housing tenures provided on development sites at different scales (i.e. shared ownership, affordable rent, starter homes, self and custom build etc.)
- To set out a clear planning policy for off-site affordable housing contributions and where this may be appropriate, in line with national planning policy guidance.
- To set out a clear planning policy to support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, including allowing some market homes to help facilitate this.

Are there any issues or challenges that we have missed?

How to protect the provision of affordable housing if the government is successful in reducing house prices, since developers will use reduced profit margin to reduce or withdraw the provision.

There should be more encouragement for Housing Associations and similar bodies to take an active role in promoting development of shared ownership and affordable housing schemes

Do you agree with the proposed policy options?

In principle yes.

Historically the percentage required of affordable housing has not been achieved. Developers under provide with the viability argument utilised. New / lateral thinking is required backed by policy. 'Affordable' housing is not affordable to much of the population.

Do you disagree with any of the options?

There seems to be a “standard” percentage used for new developments. In some locations it would be appropriate to have higher levels of affordable housing, while in some circumstances it may be appropriate to have little or no affordable housing. One size does not fit all areas.

Are there any other policy options we should be considering?

Driving policy in coordination with central government to boost houses BUILT and reduce property prices, therefore making all housing essentially “affordable” and reducing the need for “affordable / social” housing to only the poorest levels of the local population

Do you have any other comments in relation to how we can plan to deliver affordable housing, including the range, type and tenure?

There should be more emphasis on provision for Community Land Trusts. A number have been formed who are unable to gain access to any land, since it is all being put forward and “banked” by developers. Social housing provision should particularly ensure the additional of extra one bed and two bed properties, to meet the needs of families on the housing waiting list and to allow those trapped in larger properties and having to pay Bedroom Tax to downsize.

The Rowntree Foundation predicted in the 1980’s that affordable housing should be sited close to employment and public transport; the Council should be zoning brownfield sites as being only suited to smaller and more affordable units.

OUR LOCAL ECONOMY

Direction of travel policy options

We are considering the following policy directions:

- To establish how much economic development floorspace will be required in Wealden over the plan period, including any unmet needs from neighbouring authorities and provide a strategy for bringing forward sufficient employment land to meet those agreed needs;
- Provide a spatial strategy for the distribution of new economic development that takes into account the known constraints of the district to ensure that sustainable development comes forward;
- Provide planning policies that ensure new employment development, whether large or small, are of a good design, have a suitable access and are supported by the right infrastructure;
- Provide planning policies that seek to protect existing employment land from redevelopment in both urban and rural settings where this is needed;
- Provide planning policies that set clear criteria is established for the expansion and/or intensification of existing employment sites where planning permission is required;
- Provide further guidance on the protection of residential amenity where employment uses are intensified/expanded in residential areas;
- The new Local Plan will direct our largest scale employment generating activities in Wealden to the most sustainable locations;
- Provide planning policies that support and are flexible with regards to small-to-medium sized enterprises and help facilitate the growth of such businesses in the future. This could consider actively considering options to make land available for such business uses;
- Provide further guidance on the types of offices that could be encouraged in the economic climate, specifically the types of shared, flexible and managed workspaces suitable for start-ups and very small businesses;
- Provide further guidance for rural businesses that includes issues surrounding the diversification of existing farming enterprises, the conversion of rural buildings for employment use and the expansion/intensification of outdoor recreational businesses; and
- To ensure that planning policies create an environment which enables the cultural and creative economy to expand

Are there any issues or challenges that we have missed?

There is nothing here that suggests how need is assessed. How do we avoid overdevelopment and having industrial areas standing empty. Station Road in Hailsham has units standing empty for over four years. 7.18 highlights the shortage of quality business premises, particularly on the A22 corridor. Why, then, has the Council purchased land zoned for commercial development (Knights Farm) and immediately put it forward in the SHELAA for residential development??

Do you agree with the proposed policy options?

Agreed that the local plan should include provision for SMEs and start ups. This should include retail space for smaller business, which could be created within empty shops.

Do you disagree with any of the options?

YES Providing 'economic floorspace' for 'unmet needs from neighbouring authorities' is the opposite of 'sustainable development' and conflicts with option 2 - 'taking into account the known constraints of the district'

Are there any other policy options we should be considering?

Creation of local work hubs to enable “working from the locality” – not necessarily working from home, but close by

WDC should be working closely with local business owners and chambers of commerce to identify local development needs and also carefully considering the recommendations of the Land and Premises Supply Study. We should also be trying to retain the life blood of our high streets by providing retail space for very small businesses.

Do you have any other comments in relation to how we can plan for employment within both the urban and rural areas of our district?

Development at the moment seems driven by housing numbers and is not adequately attached to employment opportunity. Business will not come because you build houses – houses develop historically where there is work

There is an assumption that economic growth is essential. This is completely at odds with tackling climate change and fresh thinking is required. Any growth should focus on the local economy and provide for employment where people actually live.

OUR LOCAL AND TOWN CENTRES

Directions of travel policy options

As part of our Local Plan we will:

- Setting visions and objectives for each of our larger town centres and identifying specific improvements that could be brought forward through future development proposals;
- Establish a hierarchy of town and local centres in the District taking into account each centre's size and function;
- Define the extent of our town centres and primary shopping areas;
- Direct new major retail and leisure development into our larger town centres;
- Require out of centre retail development proposals to prove no adverse impact on our existing centres by setting a locally specific threshold for retail impact assessments;
- Provide planning policies that support and encourage the regeneration and development of appropriate town centre sites, encouraging a suitable mix of uses;
- Provide planning policies that support the delivery of a range of shop unit sizes to meet the needs of retailers and businesses that wish to locate or increase their offer in our town centres;
- Provide planning policies that support and encourage a more vibrant daytime and evening economy within our town centres including diversity of uses such as pop-up shops, shared spaces etc.;
- Provide policies to protect community uses, local shops and services in our local centres / villages;
- Provide planning policies that seek to retain, enhance and re-introduce or create new markets; and
- Provide planning policies that will preserve or enhance the character and appearance of our town and local centres.

Are there any issues or challenges that we have missed?

There does not seem to be sufficient emphasis on change of retail pattern, increase in online shopping and how retail space can be re-utilised in the future.

Do you agree with the proposed policy options?

It's agreed that we should be providing a variety of size retail spaces. However, the priority should be attracting and retaining locally based businesses.

Do you disagree with any of the options?

No

Are there any other policy options we should be considering?

Public transport and sustainable travel needs to feature in the policy options when considering town and other centres.

This policy needs to be carefully linked with transport policy, particularly public transport. WDC needs to carefully consider how we can drive shoppers to our town centres, rather than shoppers heading out of town and out of District.

Do you have any other comments in relation to how we can plan for retail in our town and local centres?

The pattern of retail is changing. Town centres need to have flexible space, not only in terms of flexible size, but also additional usage. There is a tremendous amount of unused space above shops and other properties which could be put back into multiple uses, including residential, with the right planning and incentives. Perhaps there could be some freedom for WDC to reduce business rates for some categories of business, to encourage diversity on our High Streets.

TOURISM

Direction of travel policy options

We are considering the following policy options:

- Provide planning policies that support and encourage the sustainable growth of the tourism and cultural offer of the District through the delivery of new tourism businesses as well as supporting the expansion of existing business. This should include tourism accommodation;
- Provide planning policies which facilitate, subject to criteria, proposals that deliver high quality and sustainable tourism experiences including enhancing visitor experiences; increasing the length of stays and encouraging year round tourism;
- Provide planning policies specific to the types of tourism accommodation we want to encourage and offer, taking account of any relevant evidence base data;
- Provide policy support for farm diversification in regards to tourism offers be that accommodation or experiences;
- Look at providing policies which support and facilitate the sustainable delivery of experiential tourism such as viticulture;
- Consider policies that provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities of the district;
- Consider the location and design on any tourism related development to minimise the need for travel by car and which encourages travel by other sustainable means such as public transport, walking and cycling;
- Ensure that any planning policies for tourism development will not lead to adverse effects on the character, historical significance, appearance or amenity of the district. This includes avoiding adverse impacts on the vitality and viability of village and town centres;
- Provide policies that prevent the loss of visitor accommodation, visitor attractions and recreation facilities unless under very specific circumstances; and

Are there any issues or challenges that we have missed?

Equestrian activities (and use/maintenance of bridleways) as a tourist opportunity has been completely overlooked

Although links with nature are mentioned, much more could be made of tourist opportunities that are specifically linked with nature e.g. conservation-type holidays; opportunities to learn traditional Sussex crafts and skills (unless these were included within the experiential tourism bracket); opportunities to explore different natural sites.

Do you agree with the proposed policy options?

There is too much emphasis on accommodation especially as the evidence base is thin.

We would disagree with the implied suggestion that self-catering and camping type holidays are over-represented in Wealden. The type of camping offered by sites such as WoWo in Sheffield Park is hugely popular and further sites such as this could be encouraged. This is not to say that other forms of holiday accommodation should not be promoted. Wealden is a beautiful area and tourism could be a real economic powerhouse for us if sufficiently promoted and managed sustainably.

Do you disagree with any of the options?

No

Are there any other policy options we should be considering?

There could be more emphasis on local history, for example there could be tourism in Hailsham based on rope-making history, and other attractions based on historical Sussex crafts e.g. Trug making and brewing

Do you have any other comments in relation to how we can plan for tourism and culture within the district?

This section of the plan is under-developed; more details of the types and locations of tourist activities are required before planning options can be proposed

Linking to places like Eastbourne is important – how can we attract people who have come to Eastbourne for a week to venture north into Wealden?

Given the cuts in funding to Ashdown Forest from ESCC, WDC should consider increasing its financial contribution to safeguard this valuable tourist asset.

OUR NATURAL ENVIRONMENT PART ONE

Direction of travel policy options.

We are considering the following policy options:

- Provide a policy to seek biodiversity net gains onsite and only consider other avenues when this is not possible and it is supported by firm evidence;
- Provide a criteria based policy for allowing offsite biodiversity net gains to be delivered;
- Continue to resist development proposals that would be likely to adversely affect the biodiversity of the district including designated and non-designated sites as well as individual biodiversity features;
- Provide policies which support and encourage development that maintains, restores, enhances and where possible creates biodiversity and ecological networks;
- Look at the potential to establish a strategic network of areas/sites that could be identified and allocated for off-site biodiversity net gains and set this within policy;
- Consider the potential to require more than the national 10% biodiversity net gain requirement for development;
- Look to provide planning policies which retain and protect specific biodiversity features such as trees and hedgerows on a district wide basis; and
- Consider the introduction of buffer zones for sites with importance for nature conservation.
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Are there any issues or challenges that we have missed?

These policy statements appear very passive and do not go far enough to create new natural spaces through activities such as rewilding and tree planting. There also needs to be specific protection for named areas, such as Pevensey Levels and Ashdown Forest.

Do you agree with the proposed policy options?

Yes, but they need to be much more firmly promoted and followed by WDC in planning.

Do you disagree with any of the options?

Off-site' biodiversity should be eliminated or minimised.

Presumably 'off-site biodiversity' is like carbon offsetting, but for nature. This seems no substitute for maintaining the existing biodiversity within Wealden and a "cop out" option.

Are there any other policy options we should be considering?

Perform a district-wide Biodiversity assessment and set a baseline from which to work upwards.
Recognise the contribution that agriculture makes to bio-diversity and give this a higher weighting when assessing suitability for greenfield development.
Working with farmers to encourage re-wilding and tree planting. Set much stricter criteria when considering development of greenfield development sites.

Do you have any other comments in relation to how we can plan for biodiversity within the district?

Set clear boundaries in areas like AONB and put a moratorium on any development in those areas to ensure that biodiversity is maintained or net increased

At 17%, Wealden has half the UK average for 'Natural Landscape'

<https://www.bbc.co.uk/news/uk-41901294>

Whilst much is made of the AONB, avoiding further loss of natural landscape should be a priority

OUR NATURAL ENVIRONMENT PART TWO

Direction of travel policy options.

We are considering the following policy options:

- Continue to resist the inappropriate loss of green infrastructure, green infrastructure assets (trees, hedgerows, open spaces etc.) and green/blue spaces and support proposals to enhance access to, as well as the quality and quantity of, green infrastructure;
- Provide a policy setting out the strategic green infrastructure network in the district and identify what development will need to achieve in relation to it;
- Provide policies setting out green infrastructure principles and standards that developments will need to achieve, using the green infrastructure evidence base;
- Provide policies to create green infrastructure links between new developments and the wider green infrastructure network including existing and new green/blue spaces;
- Include green infrastructure within any generic infrastructure policy, alongside more traditional 'grey' infrastructure i.e. roads;
- Provide support for the designation of Local Green Spaces where appropriate in Neighbourhood Plans but also through the Local Plan;
- Provide policies to support the creation of new green spaces and the protection of existing. Include requirements for linkages to be made between green spaces themselves and developments;
- Ensure that future green and open space needs are planned for in areas with the potential for substantial change and support the creation of new publicly accessible green and open space in areas of deficiency; and
- Enhance green and open spaces to provide a wider range of benefits for residents. Examples could include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement or flood storage

Are there any issues or challenges that we have missed?

10.26 and 10.27 stress the value of incorporating green spaces into housing and 'putting the environment right at the centre of the planning process'. Worthy sentiments - but just how does the Council intend to achieve them?

It's not clear how green space will be provided as part of new developments over and above the level which is currently happening, as this is inadequate. There is no reference to rebalancing the shortage of recreational green space in the south of the district

Do you agree with the proposed policy options?

Agree with the creation of new green spaces where possible, but SANGS should not be the default position. The default position should be not building on green land and prioritising brownfield sites.

Do you disagree with any of the options?

No

Are there any other policy options we should be considering?

Towns like Uckfield and Hailsham do not have sufficient land for football and other sports. Thought should be given as to how these can be created to cater for the needs of growing communities.

Do you have any other comments in relation to how we can plan for green infrastructure and green/blue spaces within the district?

Can smaller developments be brought together in some way to increase the size of green spaces within development areas that can be achieved?

OUR LANDSCAPE, HERITAGE AND CULTURAL ASSETS Part One

Direction of travel policy options.

We are considering the following policy options:

- To continue to resist inappropriate loss of valued landscapes and approving proposals that will conserve or enhance landscape character and its wider benefits;
- Providing a criteria based policy for allowing development in the countryside;
- Consider a policy that protects green and blue corridors;
- Consider a policy which is specific to design within the landscape – designated and non-designated – and set out certain criteria;
- Develop a High Weald AONB specific policy requiring proposals to clearly demonstrate how they have regard to the objectives of the High Weald AONB Management Plan and High Weald Design Guide;
- Consider a policy which protects and enhances rural landscape features in their own right i.e. hedgerows, field patterns, settlement patterns, trees, water features; and
- Consider the inclusion of a dark night skies policy which will control lighting schemes in those parts of the district with the darkest skies.

Are there any issues or challenges that we have missed?

WDC needs to define stringent criteria to take control of development of our rural landscape. It is not sufficient to say that a policy will be 'considered'; policies must be defined and implemented. We need creation of "no-go" areas where development will not be allowed under any circumstances

Do you agree with the proposed policy options?

Yes but not convinced they are strong enough

Do you disagree with any of the options?

Not in principle

Are there any other policy options we should be considering?

Stringent protection of specific environments and rural features.

Do you have any other comments in relation to how we can plan for landscape within the district?

Designate areas in advance

OUR LANDSCAPE, HERITAGE AND CULTURAL ASSETS Part Two

Direction of travel policy options.

We are considering the following policy options:

- Provide district wide planning policies to conserve and enhance the significance of the historic environment through the positive management of development affecting heritage assets (designated and non-designated), including through the safeguarding of heritage assets and their setting.
- Provide planning policies that support and encourage the appropriate use of historic buildings, including historic farmsteads, to ensure their continued viability whilst protecting their character and setting;
- Provide planning policies that will secure the conservation of a heritage asset for the foreseeable future through 'enabling development' that might otherwise conflict with other planning policies;
- Provide a criteria based planning policy for the consideration of development that relates to demolition involving heritage assets and;
- Provide a policy for the sustainability of historic buildings and heritage assets (i.e. in relation to renewable energy generation, energy efficiency measures taking a 'whole building' approach.

Are there any issues or challenges that we have missed?

No additional comments

Do you agree with the proposed policy options?

In principle

Do you disagree with any of the options?

No

Are there any other policy options we should be considering?

No

Do you have any other comments in relation to how we can plan for heritage and cultural assets within the district?

Heritage and cultural assets could be assessed as part of a programme, and safeguards put in place to prevent unsuitable planning applications coming forward

DESIGN

Direction of travel policy options.

We are considering the following policy options:

- Provide a clear vision and expectations for the design of development in the district;
- Providing policies that support high quality and inclusive design in new development and improvements to the public realm;
- Provide a criteria based planning policy to ensure scale, massing, height, details and materials in developments reflect the character, local distinctiveness, and context of the district;
- Maintain the provision of a detailed Design Guide to accompany any design policies within the Local Plan;
- Provide housing policies that will ensure new residential developments are tenure blind so that affordable housing is well integrated and has the same external appearance as private housing. This will assist in preventing segregation within developments and promote social cohesion;
- Provide policies which relate to the layout and design of sites in terms of public spaces including green spaces and open space provision. Ensure that open space standards are included in any such policies;
- Ensure that any policies on design take full account of the need to protect and enhance the natural environment and wildlife;
- Provide policies on standards for accessible and adaptable developments including allowing for homes to be capable of adaptation to meet changing needs of occupants i.e. as they get older. This should include the adoption of minimum space standards for new residential developments in line with national standards but amended if necessary to meet local needs;
- Promote sustainable construction methods through policies;
- Provide sustainable design policies to include energy and water efficiency measures as well as the orientation of developments and greening measures including green roofs, green walls and tree planting;
- Provide policies that ensure developments are designed and delivered to enable and promote good living conditions for new and existing residents. This will support health and well-being goals as well;
- Provide planning policies for the design of the public realm including shopfronts and street furniture in town and village centres; and
- Consider the provision of area specific design policies for different areas of the district in order to better reflect the varied character of the district.

Are there any issues or challenges that we have missed?

No mention of low carbon building materials and techniques

No mention of "Low-energy houses", which often have active and passive solar building design and components, which reduce the house's energy consumption and minimally impact the resident's lifestyle.

In principle

Do you disagree with any of the options?

No

Are there any other policy options we should be considering?

Driving more Neighbourhood plans – perhaps “mini plans” generated by Parish councils at a lower cost than current NP process could feed in to allow parishes to “Set a local identity”

Do you have any other comments in relation to how we can plan for high quality development through good design within the district?

Lobby government for better building standards both in materials and carbon footprint.

One of the headings in the document is entitled ' Ensuring that new development is designed to consider climate change from project inception, taking account of the whole life of the development'.

This statement is laudable if carried out but there has been zero evidence to date of any planning or design directives to achieve the above. Housing layouts being produced are still the same as in the 1980's – detached or semi detached low rise housing designed with multiple car ownership in mind and excessive use of tarmac roads. These estates seem to be remote from employment and become dormitory suburbs reliant on car use. Wealden's own statistics have identified that nearly 50% of all emissions come from transport and so this area should be of critical importance in tackling climate change.

Design should include a requirement for a minimum garden size (communal garden for flats).

HEALTH AND WELL-BEING

Direction of travel policy options.

We are considering the following policy options:

- Provide policies setting out the location, quantity and quality standards new development is expected to deliver in terms of open space, sport and recreation facilities;
- Continue to protect and resist the inappropriate loss of open space, sport and recreation facilities;
- Ensure the location of new housing development (including site allocations) is situated on land and in areas accessible to employment, services & facilities (including healthcare and community), public transport, open space, walking and cycling routes in order to create walkable neighbourhoods;
- Provide policies that support and encourage active travel choices including walking, cycling and public transport. Ensure that distances needed to travel to access recreational facilities and open space are minimal and that access to these is possible via walking and/or cycling;
- Provide policies to support public realm improvements including but not limited to appropriate street lighting, signage and street legibility;
- Ensure that new development is designed to reduce the risk of crime.
- Provide policies that support and encourage local and sustainable food production (i.e. allotments, community gardens);
- Provide policies that provide the appropriate housing mix for the district, informed by the evidence base, and ensure that policies support the provision of housing that accounts for the changing age profile of the district, ensuring suitable housing adaptability where possible.;
- Consider opportunities to design in safe and accessible walking and cycling networks to developments. This could then help support and encourage the proportion of residents who walk and cycle in the District. This could have beneficial impacts on health, obesity, reducing emissions and sustainable transport;
- Provide policies to support and encourage mixed use developments. The blending of homes with shops, employment and civic building brings well-known health benefits to residents by encouraging walking, and corresponding benefits to the environment by removing the need to drive;
- Ensure that development, particularly housing development, is made healthy through the provision of good quality green / open spaces and greening measures within their design and layout; and
- Noise management policies should be considered for the district particularly given its rural nature as this can affect health and well-being.
- To protect existing social and community facilities so people have a places to meet and socialise.
- To promote new social and community facilities as part of residential or other mixed use development schemes where appropriate.

Are there any issues or challenges that we have missed?

Provision for good mental health has been omitted. This should include not only access to specialist services, for all support levels, but also opportunities for socialising for all age groups and opportunities for learning to encourage resilience.

Provision of facilities with green areas – for example developers are providing football pitches, but not with changing facilities / toilets/parking which make these sports areas less valuable and indeed unable to be used for organised youth / childrens sports due to FA rules.

Do you agree with the proposed policy options?

As far as they go, but as stated, they need to include mental health.

Do you disagree with any of the options?

No

Are there any other policy options we should be considering?

Assessment of demand for local sporting clubs – many are limited by lack of facilities, so an aspirational “wish-list” should be driving policies

Provision for a range of sports should be included, not just mainstream sports. For example, there is no ice rink in East Sussex (the closest ice rink is Guildford). Should WDC invest in one, it would be a guaranteed money maker (if large enough), as well as encouraging a healthy pursuit.

Do you have any other comments in relation to how we can plan for health and wellbeing within the district?

Coordinate the policies with social assessments – for example, socially deprived areas, areas of poor health (as in South Wealden around Hailsham) should drive special consideration.

Expand 'Healthy Wealden' and policy options to include rights of way, bridleways and other open spaces (eg National Trust) that are not listed.

The focus seems limited to 'country parks' yet there are many other open spaces and methods to get to them throughout Wealden.

Consider the concepts of resilience and social capital, as ways of fostering good health within communities.

These necessitate provision of opportunities for communities to get together and support one another.

Investigate whether more play zones can be created, where pedestrians (especially children) are prioritised over traffic. Identify ways to better utilise all green spaces within Wealden, not just the formal ones.

GROWTH OPTIONS

Strategic Growth Options

14.1 The new Local Plan will set out a long term vision for the district and sets out objectives and a spatial strategy, to provide a framework for delivering development in the district for the next 20 years or so. A key consideration for the Local Plan will be the spatial distribution of new development within the district, particularly housing and economic development to meet needs and there are four broad options presented below to meet those requirements. Although there are four possible options presented within this consultation document, it could be that a combination of several of these options presented will form the final preferred strategy to meet identified growth within the new Local Plan.

14.2 Through the existing Wealden District Core Strategy Local Plan, as well as extant planning permissions, an existing supply of both business development and housing sites have been confirmed, which will contribute to achieving some of Wealden's development needs in the future. However, as recognised elsewhere in this document, we will require further significant growth to accommodate all our requirements.

14.3 At this stage, these growth options are not about specific sites or locations of where new growth should take place, but at the highest level the options for how the district may develop – should we seek to deliver all the growth in one or more strategic locations, should we spread the growth to all corners of the District, or somewhere in between.

14.4 It should be noted that the following options are presented in no particular order.

Option 1 – Focused Growth including Large Extensions to Existing Sustainable Settlements

14.5 This option would be to focus on growth for existing sustainable settlements, similar to the approach taken in the Core Strategy Local Plan (2013).

14.6 For this option, our most sustainable settlements (possibly including those very close to the border) would deliver the vast majority of the growth in the district. A smaller proportion of growth would then go to other sustainable rural settlements within the district, including larger villages with sustainability credentials. There would only be very limited growth in smaller villages and rural areas.

Key Implications for this Approach

- Accepting further development in some locations would involve substantial developments within the High Weald AONB that would need to be justified through national planning policy;*
- Accepting further development within South Wealden will likely necessitate a need to deliver substantial highway infrastructure improvements to the A27 and A22 that requires substantial government investment that is not yet committed;*
- Limited development within the villages and rural areas of Wealden may be a missed opportunity to make best use of development potential in these locations, where we may otherwise allow villages to grow in a sustainable way;*
- This option would focus development on the most sustainable locations in the district with access to local shopping services, education, leisure and recreational facilities;*
- This option would ensure more access for public transport and an opportunity to enhance those public transport opportunities as a result of further growth;*
- Possible opportunities for higher densities in urban areas and town centre locations, especially where there is good access to public transport, services and jobs;*
- This option provides limited opportunities to provide affordable housing within rural areas and/or the High Weald AONB, where affordability issues are most acute;*
- Wealden has a limited selection of brownfield sites and where they have been available, many have previously been granted planning permission for new housing development. Therefore, the district has a limited supply of additional brownfield sites, particularly in settlements that have been the focus of growth for a number of years; and*
- This option would reduce the potential impact of development pressure on other more rural parts of the district.*

Option 2 – Semi-Dispersed Growth to Existing Sustainable Settlements and Larger Villages

14.7 This option would distribute growth across the district to sustainable settlements, with the majority of development still being located within the most sustainable settlements as listed in option one (subject to further settlement hierarchy work), but with a

larger proportion of growth being earmarked for other sustainable settlements within the district, such as larger villages within the district that have sustainability credentials (this will be updated as part of the Council's settlement hierarchy work). There would continue to be only limited growth within smaller villages and rural areas.

Key Implications for this Approach

- Accepting further development in some locations would involve substantial development in the High Weald AONB that would need to be justified through national planning policy;
- Accepting further development within South Wealden will likely necessitate a need to deliver substantial highway infrastructure improvements to the A27 and A22 that requires substantial government investment that is not yet committed;
- This option would still lead to more limited development within smaller villages and rural areas, and may not support their sustainable growth;
- This option would focus development on the most sustainable locations in the district with access to local services;
- There would be more access for public transport opportunities and opportunity to enhance those public transport opportunities as a result of further growth;
- Some larger villages are not well served by public transport, which may result increased reliance on car use;
- This option still provides limited opportunities to provide affordable housing within rural areas and/or the High Weald AONB, where affordability issues are most acute, albeit it would be an improvement over option 1 in this respect;
- This option may provide potential to enhance the sustainability of larger rural settlements through new housing development (and additional population) supporting local services/facilities and enhanced public transport;
- Possible opportunities for higher densities in urban areas and town centre locations, especially where there is good access to public transport, services and jobs; and
- This option would present the opportunity for larger villages to support local services and contribute to the viability of the rural economy.

Option 3 – Dispersed Growth

14.8 This option would be to provide for development in all settlements across the district in line with an updated settlement hierarchy that assesses the sustainability credentials of all settlements in the district. The amount of new development would be proportionate to the size of each settlement (and its position within the settlement hierarchy) as well as its existing services/facilities and the ability to enhance those facilities. This would be the only option where some growth within smaller villages and rural areas would be supported subject site specific constraints and the settlement's position within the settlement hierarchy.

Key Implications for this Approach

- Accepting further development in some locations would involve substantial development in the High Weald AONB that would need to be justified through national planning policy;
- Accepting further development within South Wealden will likely necessitate a need to deliver substantial highway infrastructure improvements to the A27 and A22 that requires substantial government investment that is not yet committed;
- This option may provide new homes in locations that are relatively remote from a comprehensive range of services and facilities;
- This option would present opportunities for all villages to support local services and contribute to the viability of the rural economy;
- This option may provide potential to enhance the sustainability of larger rural settlements through new housing development (and additional population) supporting local services/facilities and enhanced public transport;
- In contrast, the scale of development in some smaller villages/rural areas may not be sufficient to ensure services are viable, or improved public transports facilities;
- This option would improve the delivery of new affordable homes within rural parts of the district, including the High Weald AONB, where affordability issues are most acute;
- This option would improve the delivery of housing generally within rural areas; and
- This option would provide housing delivery in locations that are not well served by public transport with a resulting increased reliance on car usage.

Option 4 – New Settlement(s) Growth

14.9 This option would in effect include a 'new' freestanding settlement(s), potentially in the form of one or more 'Garden Village'. Depending on the final location, this option could also include the very significant expansion of an existing settlement(s).

14.10 This option would be based on a potential settlement or settlements of around 2,000 to 5,000 homes plus other business, employment, community and leisure uses. The proposed settlement would include an agreed set of design principles and would be led through a unique master plan that would form part of the Local Plan.

Key Implications for this Approach

- *It is reliant on identifying a satisfactory sustainable location for a new settlement and a willing developer to bring forward the site on a holistic basis;*
- *There would be potential Strategic Growth Options*
- *14.1 The new Local Plan will set out a long term vision for the district and sets out objectives and a spatial strategy, to provide a framework for delivering development in the district for the next 20 years or so. A key consideration for the Local Plan will be the spatial distribution of new development within the district, particularly housing and economic development to meet needs and there are four broad options presented below to meet those requirements. Although there are four possible options presented within this consultation document, it could be that a combination of several of these options presented will form the final preferred strategy to meet identified growth within the new Local Plan.*
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- *This option would focus development on the most sustainable locations in the district with access to local shopping services, education, leisure and recreational facilities;*
- *This option would ensure more access for public transport and an opportunity to enhance those public transport opportunities as a result of further growth;*
- *Possible opportunities for higher densities in urban areas and town centre locations, especially where there is good access to public transport, services and jobs;*
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- *This option would reduce the potential impact of development pressure on other more rural parts of the district.*
- *Option 2 – Semi-Dispersed Growth to Existing Sustainable Settlements and Larger Villages*
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• *Option 4 – New Settlement(s) Growth*

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• *Key Implications for this Approach*

• *It is reliant on identifying a satisfactory sustainable location for a new settlement and a willing developer to bring forward the site on a holistic basis;*

• *There would be potential to plan the site through the Local Plan process, including design codes and comprehensive master planning, including the provision of transport infrastructure, community facilities, commercial uses etc;*

• *Consideration of other developments within the district would still be required given the scale of development requirements in the district, particularly in the short to medium term, as the new settlement will take some time to deliver;*

• *The delivery timescales of such a strategic development would mean that its contribution would likely not be achieved until the second half of the Local Plan period and would not help the Council with its housing shortfall in early part of the Local Plan;*

• *There may be potential impacts on national and/or international environmental constraints depending on the specific location pursued through this option;*

• *The infrastructure requirements will be considerable and may have implications for timely delivery (i.e. unexpected delays), which may require other housing developments in other locations of the district to be brought forward sooner to meet housing needs at that time;*

• *This approach may enable the local authority to capture more affordable housing from a development such as this;*

• *There would be greater scope for a mix of uses within this development though this will be dependent on the location of the settlement;*

• *The site would largely be greenfield and would therefore require a significant land take in open countryside. This would reduce the amount of brownfield land brought forward for housing development within the Local Plan;*

• *It is very unlikely that rail services would be connected to a 'new settlement' given the existing location of rail services in the district and the cost for the relocation/establishment of a new rail station within/nearby to the new settlement;*

• *In general, transport infrastructure in some areas of district may not be adequate or deliverable to support development of this scale;*

• *There is a significant opportunity to provide a high quality development, of a good design with more community engagement;*

• *This option provides limited opportunities to provide affordable housing within rural areas and/or the High Weald AONB, where affordability issues are most acute; and*

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Are there any spatial distribution options that we have missed?

Building for natural population growth, that is developing in areas of demand, and where employment opportunities can be developed.

Underpinning sustainability by prioritising the redevelopment of uneconomic brownfield sites over greenfield sites – possibly by imposing an ‘environmental levy’ on development of the latter

What is your preferred option or combination of options in order of preference?

A blend of 2 and 4 – there are circumstances where existing settlements would be suitable for expansion and have more infrastructure, but there are also small settlements where their position and access to infrastructure such as railway links and roads make them ideal for development into larger settlements.

Do you disagree with any of the options presented?

How necessary are any of these, when there is currently a huge backlog of properties that have been granted planning permission and not built. If the properties that have already been granted planning permission haven’t been built, why is WDC planning for further development required, especially when it goes against national planning policy by potentially building on the AONB?

Option 3 would only result in scattered and incohesive settlements.

What views do you have about the possibility of a new settlement somewhere in the district to provide a large proportion of development needs?

An good potential solution – if a ‘Wealden’ version of Poundsbury could be achieved; design, green space, infrastructure and an excitement in being in at the start of a new community

If such a development had to be created, it would need to be self-sustaining in terms of access to employment, leisure facilities etc.

Where do you think a possible new settlement could be located and why?

The essentials are accessibility to public transport and employment, and avoiding landscape impact.

It is a matrix of looking at transport routes (road and rail), current settlements, employment centres and excluding AONB and other environmentally important areas. One settlement often mentioned is Berwick, which has a railway station, close road link to A27 and A22. Though it must be taken into account that at rush-hour, this railway line is at capacity.

There is also interest in the area of ISFIELD although this would need the reopening of the local railway station which is not currently proposed.