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Chalvington with Ripe Parish Council (CWRPC)
Response to the Draft Local Plan for Consultation

Question 1

a) Do you agree with the updated draft Policy SS1: Spatial Strategy for Wealden, and if not, why?

b) Is there an alternative spatial strategy that we should be considering through this Local Plan? If so, please set out what the alternative spatial strategy should contain and why?

1a: The Parish Council generally supports Policy SS1, the principal concept of the 20-minute neighbourhoods, developing settlements (Type 1 & 2) which focus on growth in Wealden's main market towns. We support the protection of our rural landscapes, ancient woodlands and ecological environments. We would wish to see the Draft Local Plan avoid as far as possible the development of housing growth in rural settlements Type 4, 5 & 6. Such development will have significant impact on the already strained infrastructure, services and local road networks, which are not equipped to accommodate substantial increases in population. In many of these rural settlements, access to public transport, healthcare, education and essential services is limited.

The Parish Council is particularly concerned that incremental or speculative development in these areas would undermine the sustainability objectives set out within the Local Plan. It is essential that growth is directed towards locations where it can be supported by existing or planned infrastructure, ensuring that communities remain viable, well-served and environmentally resilient.

Furthermore, we emphasise the importance of maintaining the distinct character and setting of rural settlements (Type 4, 5 & 6), avoiding coalescence and preserving the landscape qualities that are highly valued by residents and visitors alike.

We therefore urge that the Draft Local Plan continues to prioritise development within higher-tier settlements, whilst applying robust protections and clear policy constraints to limit inappropriate growth in lower-tier rural areas.

1b: No comments

Question 2

a) Do you agree with draft Policy SS2 (Provision of Homes), and if not, why?

b) Do you agree with the list of potential sites, the amount of development, and/or the issues identified in tables 6 (alternative scenario) associated with draft Policy SS2 – Provision of Homes?

2a: The Parish Council agrees that those settlements with more services and facilities, public transport and accessibility are more sustainable for development, and that Chalvington and Ripe should be categorised as a Type 6 Settlement (Residential settlement) in the draft Settlement Hierarchy because of these factors.
The Parish Council would like to disagree with the following identified housing growth areas within the draft provision and location of homes as set out in Table 5 Pages 71 to 75.

Berwick / 72 dwellings in Focussed Plan Allocated Dwellings:

BE1: 617/1780 Land north of Recreation Ground, Station Road, Berwick Station 30 dwellings

BE2: 619/1780	Land West of Station Road, Berwick Station	27 dwellings
BE3: 822/1780	Land to north east of Station, Station Road, Berwick Station	10 dwellings
BE4: 616/1780	Land to north east of Station, Station Road, Berwick Station	10 dwellings

The Parish Council does not support the allocation of sites BE1, BE2, BE3, and BE4 in the Wealden Local Plan due to their unsustainable location, harmful impact on the rural character of Berwick, inadequate infrastructure, and environmental concerns.

1 Spatial Strategy and Settlement Hierarchy

The allocation of approximately 70+ dwellings across BE1–BE4 is fundamentally inconsistent with the role and function of Berwick Station as a small rural settlement.

The Local Plan fails to demonstrate that:

- The scale of growth is proportionate to the settlement's position in the hierarchy
- Reasonable alternatives in more sustainable locations have been adequately considered

This conflicts with:

- **NPPF paragraph 20** (strategic policies should set out an overall spatial strategy)
- **NPPF paragraph 78–79** (development in rural areas should be located where it enhances or maintains the vitality of rural communities, not overwhelms them)

The cumulative allocation represents an unjustified intensification of development in a location lacking the services and infrastructure to support it.

Future residents would be heavily reliant on private car use for access to:

- Schools
- Healthcare
- Shops and essential services

2 Unsustainable Transport and Accessibility

The sites are not located in an area that offers genuine sustainable transport choices.

Although Berwick Station provides rail access, this does not outweigh the following constraints:

- Limited service frequency and destinations
- Lack of safe, convenient pedestrian and cycling infrastructure
- Heavy reliance on private vehicle use for day-to-day needs

This is contrary to:

- **NPPF paragraph 105** (significant development should be focused on locations which are or can be made sustainable)
- **NPPF paragraph 109** (development should promote sustainable transport modes)

The Plan fails to demonstrate how modal shift away from private cars would be achieved.

3 Impact on Rural Character

These sites collectively represent a significant expansion of Berwick Station into open countryside.

Development would:

- Erode the distinct rural setting of the village
- Create coalescence along Station Road
- Urbanisation of a currently undeveloped rural edge
- Cause significant harm to landscape character and visual amenity

This conflicts with:

- **NPPF paragraph 174** (recognising the intrinsic character and beauty of the countryside)

The cumulative impact has not been adequately assessed, contrary to good plan-making practice.

4. Environmental Constraints

The sites are likely to have environmental constraints, including:

- Loss of greenfield land
- Impact on biodiversity and habitats

- Potential flood risk and drainage issues
- Water shortage

Cumulative development across the four sites identified significantly intensify these impacts. The Local Plan acknowledges that Wealden is a severely water-stressed district, yet makes no further comment and offers no mitigation. There have been acute water supply outages in the south of the district and the north of the district too. The impact of the development has not been assessed for the purposes of water supply by South East Water.

5. Cumulative Impact

The Plan incorrectly treats BE1–BE4 as discrete sites, whereas in reality their combined impact is substantial. The cumulative effect includes:

- A disproportionate increase in housing relative to settlement size
- Intensification of traffic and infrastructure pressure
- Fundamental change to settlement form and character

The Local Plan fails to adequately assess or justify this cumulative impact.

6. Conclusion

For the reasons outlined above, the allocation of sites BE1, BE2, BE3, and BE4 is unsound. The proposals are not sustainable, are poorly supported by infrastructure, and would cause significant harm to the character and environment of Berwick.

As a neighbouring Parish Council to Berwick, we respectfully request that these sites are removed from the Draft Local Plan.

2b:

Arlington / Hailsham – Proposed Allocation: 2,000 dwellings (1,600 within the plan period)
Focussed Plan Allocations: OARL1 (Sites 825/1310)

Land to the north-west of Hempstead Lane, Hailsham – approx. 2,500 dwellings (1,500 within the plan period)

Table 6: Option Sites for Further Assessment and Consultation (Pages 80–89)

The Parish Council strongly objects to the allocation of site OARL1 825/1310 within the Wealden Local Plan for the following reasons:

1. Transport and Highway Impact

The local road network—particularly Hempstead Lane, the A22, Boship Roundabout, and surrounding rural lanes—already experiences significant congestion and operates at or near capacity. The scale of the proposed development would place substantial additional pressure on this network.

- There is no clear or deliverable strategy to mitigate the anticipated increase in traffic.
- Public transport options are limited and do not provide a viable alternative to private car use.
- Hailsham has no railway station; residents would therefore rely heavily on private vehicles to access nearby stations at Polegate and Berwick.
- There is a lack of safe and adequate cycling and walking routes into Hailsham. The site is effectively severed from the town by the busy A22 and does not align with the principles of a “20-minute neighbourhood.”

2. Environmental Impact

The site lies within a sensitive rural landscape. Its development would result in the loss of greenfield land, with consequential harm to biodiversity, wildlife habitats, and the intrinsic character of the countryside. This is contrary to the principles of sustainable development and environmental protection.

3. Flood Risk and Drainage

Parts of the site fall within flood zones associated with the River Cuckmere. Given this proximity and existing flood constraints in the area, there is significant concern that development could exacerbate flood risk both on-site and in surrounding areas. Insufficient evidence has been provided to demonstrate that the site can be developed safely without adverse impacts.

4. Infrastructure Capacity

The proposed scale of development would place considerable strain on local infrastructure, including healthcare services, schools, and utilities. There is no clear evidence that the necessary infrastructure can be delivered in a timely manner alongside development.

6. Conclusion

For the reasons outlined above, the proposal is considered to conflict with the Draft Local Plan when assessed as a whole. There are no material considerations that outweigh this conflict.

As a Parish Council located within close proximity to the site, we are particularly concerned about the wider impacts of this development. These include increased and severe congestion not only on the A22, but also on the surrounding rural lanes, including those passing through Chalvington with Ripe.

We therefore respectfully request that this site be removed from Table 6: Option Sites for Further Assessment and Consultation.

OEH1 1235/1950 Land at Laughton Park Farm, East Hoathly, Halland and Laughton 4,000 dwellings (925 during the Plan Period)

Table 6: Option Sites for Further Assessment and Consultation (Pages 80–89)

The Parish Council strongly objects to the proposed allocation of land at Laughton Park Farm (Site OEH1, SHELAA reference 1235/1950) for the development of approximately 4,000 dwellings (925 within the Plan period) as listed on page 81 within the Wealden Local Plan for the following reasons:

1 Scale and Unsustainability of Development

The proposed scale of development is excessive and wholly disproportionate to the size, character, and infrastructure capacity of East Hoathly, Halland, and Laughton. Introducing a settlement of this magnitude would fundamentally alter the rural nature of the area, effectively creating a new town without any of the necessary strategic planning or infrastructure to support it.

2. Impact on Rural Character and Landscape

The site lies within open countryside that contributes significantly to the rural setting and identity of the surrounding villages. Development on this scale would result in substantial urbanisation, loss of countryside, and coalescence between settlements, eroding their individual identities.

This will lead to significant change in the rural and tranquil landscape in this part of the Low Weald. Ancient woodland, hedgerows, historic landscape and watercourses, all elements of the landscape of the Low Weald character area, would suffer substantial harm.

3. Infrastructure Deficiencies

The existing infrastructure in the area is already under strain. There is insufficient capacity in:

- Local road networks, which are rural and not designed for significant increases in traffic
- Healthcare services and GP provision
- Schools and educational facilities
- Public transport, which is limited and unlikely to support sustainable travel patterns

The proposal lacks credible and deliverable solutions to address these deficiencies.

4. Highway and Traffic Concerns

The increase in vehicle movements generated by up to 4,000 dwellings would have severe impacts on local roads, including congestion, reduced safety, and increased pollution. Rural lanes and key junctions are not suitable for such volumes of traffic, and upgrades would likely be intrusive and harmful to the character of the area.

- There is no significant transport infrastructure and no train station.
- Residents will largely be reliant on the private car, which in time could put an additional 10,000 vehicles on the roads in this area which are all single carriageway (A22 and B2192) or narrower country lanes.
- The site is criss-crossed by narrow country lanes and these are narrow and unsuitable for traffic seeking to avoid bottlenecks elsewhere. The use of rat-runs is already an issue for nearby villages such as Laughton.

5. Environmental and Ecological Impact

The site is likely to support important habitats and biodiversity. Large-scale development risks:

- Loss of wildlife habitats
- Harm to protected species
- Increased pollution and surface water runoff
- Pressure on nearby environmentally sensitive habitats, such as the significant areas of ancient woodland within or adjoining the site, and the SSSI at Park Corner Heath (which is immediately adjacent to the site) would all be irrevocably damaged by an intensification of development on this scale, leading to increased footfall from the enormous amount of people on the development site. Harm to these protected areas would be against national policy.
- The development would cause significant light pollution, which in turn would adversely impact the ecology, in an area which currently benefits from dark skies.

A development of this magnitude is inconsistent with environmental protection objectives.

6. Water Supply

The Local Plan acknowledges that Wealden is a severely water-stressed district, yet makes no further comment and offers no mitigation. There have been acute water supply outages in the north of the district and, occasionally, in the south of the district too. The impact of a development of this scale, as well as the cumulative impact of the other developments in this area, has not been assessed for the purposes of water supply by South East Water.

Rivers Trust data shows that the two nearest waste water and sewage treatment works are not able to cope with current levels of waste: in 2024 the Halland Waste Water Treatment Works spilled 183 times for a total of 3,549.39 hours (which equals 147 days), discharging into the Ridgewood Stream. In the same year, the East Hoathly Sewage Treatment works spilled 67 times for 749.54 hours (31 days) into a tributary of Glynde Reach. It is noted that Southern Water plans to upgrade the Halland plant in 2026, but an upgrade to the East Hoathly site is not planned until after 2030.

7. Flood Risk

The Environment Agency Long Term Flood Risk Service shows a number of areas across the site which have a high chance (more than 3.3% each year) of surface water flooding, as well as a significant area across the site which is at a high risk (more than 3.3%) of flooding from the watercourses which cross the site.

8. Deliverability and Viability Concerns

There are serious doubts about whether a development of this scale can be delivered within the Plan period, particularly given the infrastructure requirements. Including such a large and uncertain allocation risks undermining the soundness of the Plan.

9. Conclusion

For the reasons outlined above, The Parish Council consider the allocation of Site OEH1 (1235/1950) at Laughton Park Farm is unsound. It is unsustainable, disproportionate, and would result in significant harm to the environment, infrastructure, and character of the area. The proposal should therefore be removed from the Plan.

Question 3

a) Do you agree with draft Policy SS3 Gypsy, Travellers and Travelling Showpeople – Accommodation Needs, and if not, why?

b) Do you agree with the list of potential sites, the amount of development, and/or the issues identified in table 7 associated with draft Policy SS3 – Gypsy, Traveller and Travelling Showpeople – Accommodation Needs?

3a: The Parish Council generally supports Policy SS3. It is essential that the Local Plan makes appropriate provision for Gypsy, Traveller and Travelling Show people communities in line with national policy and identified need.

By planning positively for accommodation, the Council can reduce unauthorised encampments, improve access to services, and support inclusive communities. The use of a defined evidence base and land availability assessment provides a clear and plan-led approach.

3b: No comments

Question 4

Do you agree with the updated draft Policy SS4: Retail Provision and Town Centres, and if not, why?

4: The Parish Council generally supports SS4, This is consistent with the **National Planning Policy Framework (NPPF)** approach, which prioritises town centres as hubs for retail, leisure, and community uses.

Question 5

Do you agree with the updated draft Policy SS5: Provision of Employment Floorspace, and if not, why?

5: No comments

Question 6

a) Do you agree with the updated draft Policy SS6: Strategic Employment Allocations, and if not, why?

b) Do you agree with the list of potential sites, the amount of development, and/or the issues identified in table 11 associated with draft Policy SS6 – Strategic Employment Allocations?

6a: No comments

6b:

OEMP, SHELAA reference 1235/1950 Land at Laughton Park Farm, East Hoathly with Halland/ East Hoathly, Halland and Laughton Development yield of up to 30,000 square metres of employment floorspace

Table 11: Further Option Sites for Employment Use (Pages 106 –107)

Parish Council object to the proposed allocation identified as OEMP2 (SHELAA reference 1235/1950), specifically in relation to the suggested development yield of up to 30,000 square metres of employment floorspace, as listed on page 106 within the Wealden Draft Local Plan for the following reasons:

1. Overestimation of Site Capacity

The proposed floorspace figure appears excessive when considered against the physical constraints of the site. Factors such as site access, topography, environmental constraints, and surrounding land uses are likely to significantly limit the realistic developable area. The yield figure does not appear to reflect these constraints and risks promoting overdevelopment.

2. Impact on Local Infrastructure

A development of this scale would place substantial pressure on existing infrastructure, including local roads, utilities, and services. There is insufficient evidence that the current infrastructure network could accommodate the additional demand generated by a scheme of this magnitude.

3. Landscape and Environmental Concerns

The scale of development implied by 30,000 sqm floorspace would likely result in adverse impacts on the character of the surrounding landscape. This is particularly concerning if the site lies near sensitive countryside, designated landscapes, or ecological assets. The proposal does not demonstrate how such impacts would be mitigated.

4. Lack of Justification for Employment Need at This Scale

There appears to be limited justification for allocating such a significant quantum of employment floorspace in this location. The plan should provide clear evidence of need, market demand, and deliverability, which currently appears lacking or insufficiently robust.

5. Suitability of Location

The site's location may not be appropriate for a development of this intensity, particularly if it is not well-related to existing employment hubs or sustainable transport links. This raises concerns regarding accessibility and long-term sustainability.

6. Conclusion

In light of the above concerns, The Parish Council objects to the inclusion of allocation OEMP2 as currently proposed. At a minimum, the projected floorspace yield should be significantly reduced to better reflect site constraints and local context, or the allocation should be reconsidered entirely.

The Parish Council requests that Wealden revisits the assumptions underpinning this allocation and provides more robust evidence to justify the scale of development proposed.

Question 7

Do you agree with the draft Policy CC8 Sustainable Drainage and Protection of the Pevensey Levels SAC and Ramsar Site, and if not Why?

7: The Parish Council supports draft Policy CC8, *Sustainable Drainage and Protection of the Pevensey Levels SAC and Ramsar Site*. The Parish Council welcomes the emphasis on sustainable drainage measures and the protection of internationally designated sites, recognising the importance of safeguarding the ecological integrity of the Pevensey Levels.

Question 8

a) Do you support the designation of the CCMA at Pevensey Bay and do you have any comments on its boundary?

b) Do you have any other comments on the wording of the draft policy?

c) Should the Council consider this policy now and include it within the Wealden Local Plan, or consider it as part of a future review of the Local Plan when funding for future delivery phases for the Shoreline Management Plan may provide more certainty on the protection of the coast?
d) Should an Article 4 Direction be applied to remove permitted development rights for residential and commercial properties within the CCMA? This would include extensions, outbuildings, hard surfacing, and other forms of development that could increase vulnerability or hinder managed retreat.
e) Do you support the removal of the development boundary for Pevensey Bay to ensure that new windfall development is steered away from this location, which is at risk from coastal change?

8a: No comments

8b: No comments

8c: No comments

8d: No comments

8e: No comments

Question 9
Do you agree with the updated draft Policy HO8: Affordable Housing, and if not, why?

9: The Parish Council broadly supports Policy HO8. Increasing the provision of affordable housing is essential to address Wealden's housing need, particularly for younger people and key workers. The policy promotes the creation of mixed and balanced communities and strikes a reasonable balance between ambition and development viability.

However, our concern is that "viability exemptions" may undermine the delivery of affordable housing in practice, potentially reducing the number of homes secured. Greater clarity on the expected tenure mix, alongside stronger safeguards to limit the use of "viability exemptions", would enhance the effectiveness of the policy and provide greater certainty that its objectives will be achieved.

Question 10
Do you agree with the updated draft Policy HO9: Gypsy, Traveller and Travelling Showpeople - Site Criteria, and if not why

10: No comments

Question 11
a) Do you agree with the updated draft Policy SA1: Housing and Mixed-Use Site Allocations, and if not, why?
b) Do you agree with the site allocations listed within this policy and if not, what are the reasons for this?

11a:
The Parish Council does not agree with:
Berwick / 72 dwellings in Focussed Plan Allocated Dwellings:

BE1: 617/1780	Land north of Recreation Ground, Station Road, Berwick Station	30 dwellings
BE2: 619/1780	Land West of Station Road, Berwick Station	27 dwellings
BE3: 822/1780	Land to north east of Station, Station Road, Berwick Station	10 dwellings
BE4: 616/1780	Land to north east of Station, Station Road, Berwick Station	10 dwellings

The Parish Council does not support the allocation of sites BE1, BE2, BE3, and BE4 in the Wealden Local Plan due to their unsustainable location, harmful impact on the rural character of Berwick, inadequate infrastructure, and environmental concerns.

11b: No comments