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Draft Local Plan

Regulation 18 - February 2026

1. We, the Steering Group of the Village Concerns Action Group, represent the views of over 250 supporters from our community and wish to express our initial reaction to the draft Wealden District Council (WDC) Local Plan (LP) Regulation 18 - February 2026

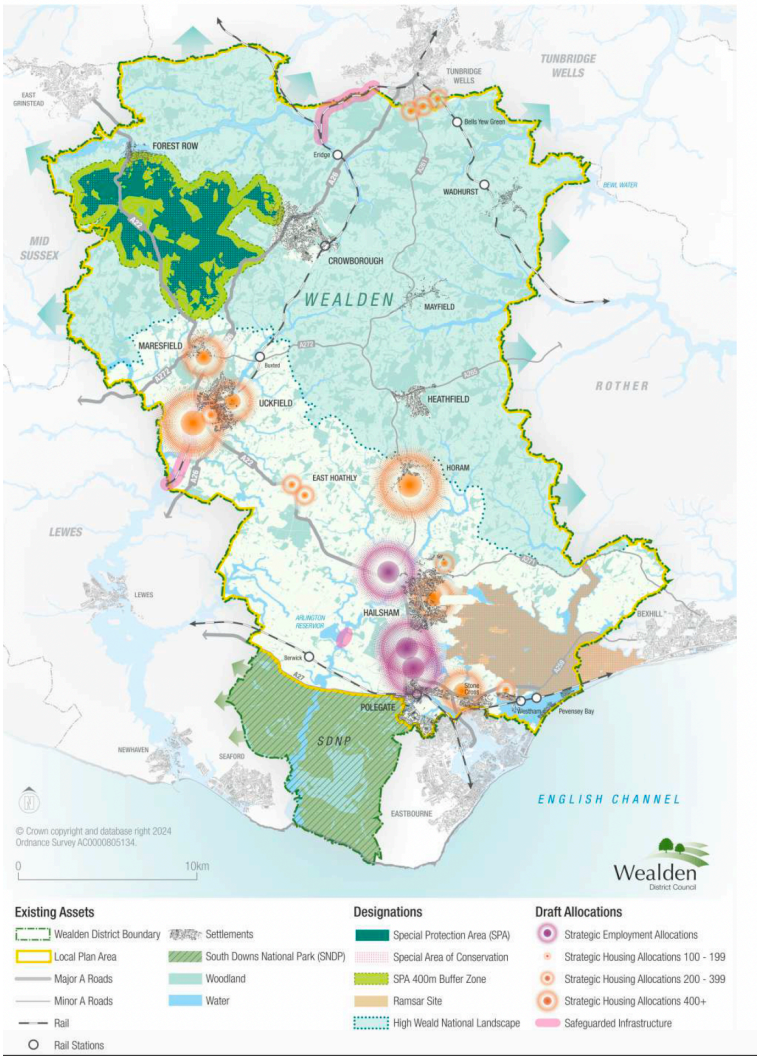
2. We welcome the publication of the draft LP 2026 and commend the considerable amount of work that has been required.

Proposed New Development

3. When you commenced the previous Regulation 18 Consultation in March 2024 we noted that several documents referred to in the draft LP 2024 were missing. The Housing Supply Topic Paper still does not seem to have been published. Please could you direct us to where it is or when it will be available ?

4. When we commented in 2024 we noted that in Map 1, you showed the housing allocation for East Hoathly as 2 entities of less than 400. This gave the impression that East Hoathly had a small allocation. This was wrong and misleading. The proposal then was an allocation of 686 homes. It was one allocation and should have been shown as such. You have repeated this misleading information on Figure 3 in the latest draft LP 2026:

Figure 3 Wealden District Key Diagram

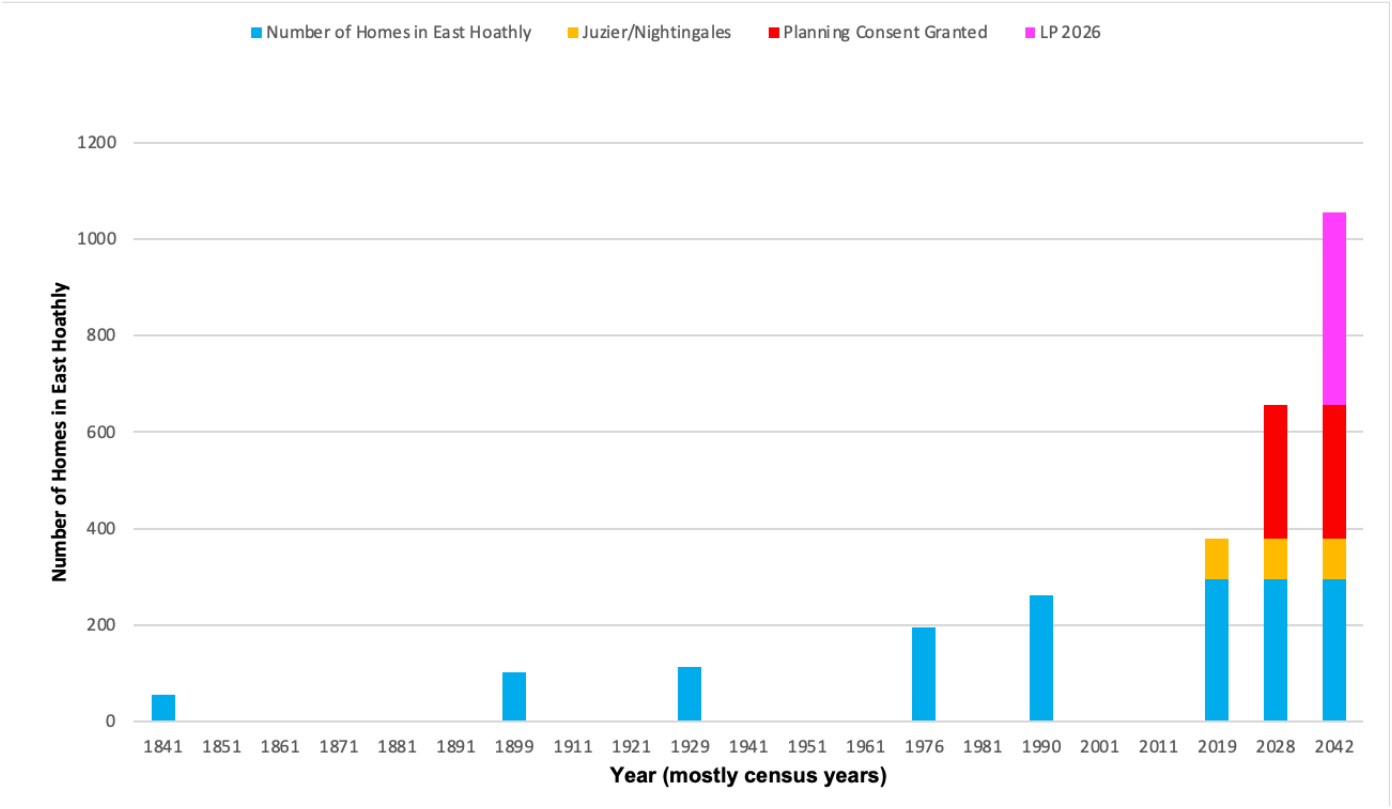


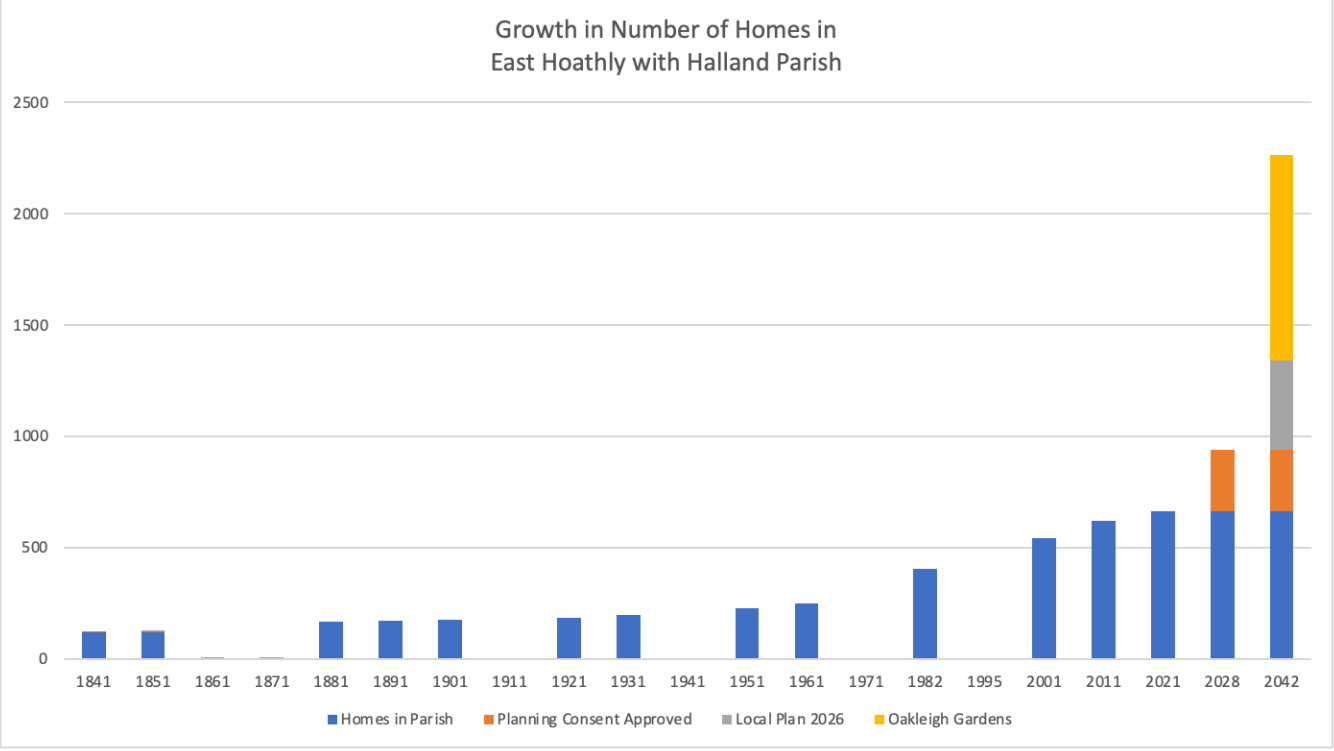
5. We have consistently presented WDC with the facts about how they have granted permission to expand this village without any Masterplan for East Hoathly nor any strategic infrastructure plan to mend its broken sustainability. WDC are now proposing to build a further 650 homes, leading to a growth from 2009 to 2042 of 305%. This is not sustainable planning but destructive planning.

6. This time you have gone even further. You have assessed the farmland put forward to the West of Halland as a “possible” site for 4,441 homes of which 925 would be built in the plan period. By doing this you have blighted the lives or thousands of residents and damaged the property values of homes and businesses. This site has significant landscape , ecological and agricultural value. It is neither adjacent to a railway nor the strategic road network. The A22 is already over capacity at the Halland junction and generally very congested. The A22 in this Parish was not identified for any funded improvements in your Interim Infrastructure Development Plan. To consider placing a car dependent new town in this area is madness and a

level of unsustainable development that would become an example to all (of the worst kind). This would see a truly mind boggling expansion of this Parish:

Growth in Number of Homes in East Hoathly





7. Halland is categorised as a Type 5 Neighbourhood - Unsustainable Settlement. Understandably this has led to no allocation of housing but also no provision of improvements to infrastructure or facilities. However, the draft LP 2026 includes the "possible" inclusion of 4,441 homes in a new town adjoining the western edge of Halland. No reference is made to the impact this will have on Halland. Will Halland be regarded as a separate settlement and remain unsustainable ? As far as we are aware there has been no dialogue with the Parish Council nor the people of Halland. Yet again WDC have dropped a planning blight bomb onto a community with no prior communication.

Environmental Considerations

8. Village Concerns raises detailed comments on planning applications in this Parish and has done so for the hybrid application (Planning Application WD/2025/0376/MAJ) covered by Policies EH2 and EH5. We repeat here 2 elements of these objections that should be considered at the strategic level of a draft LP:

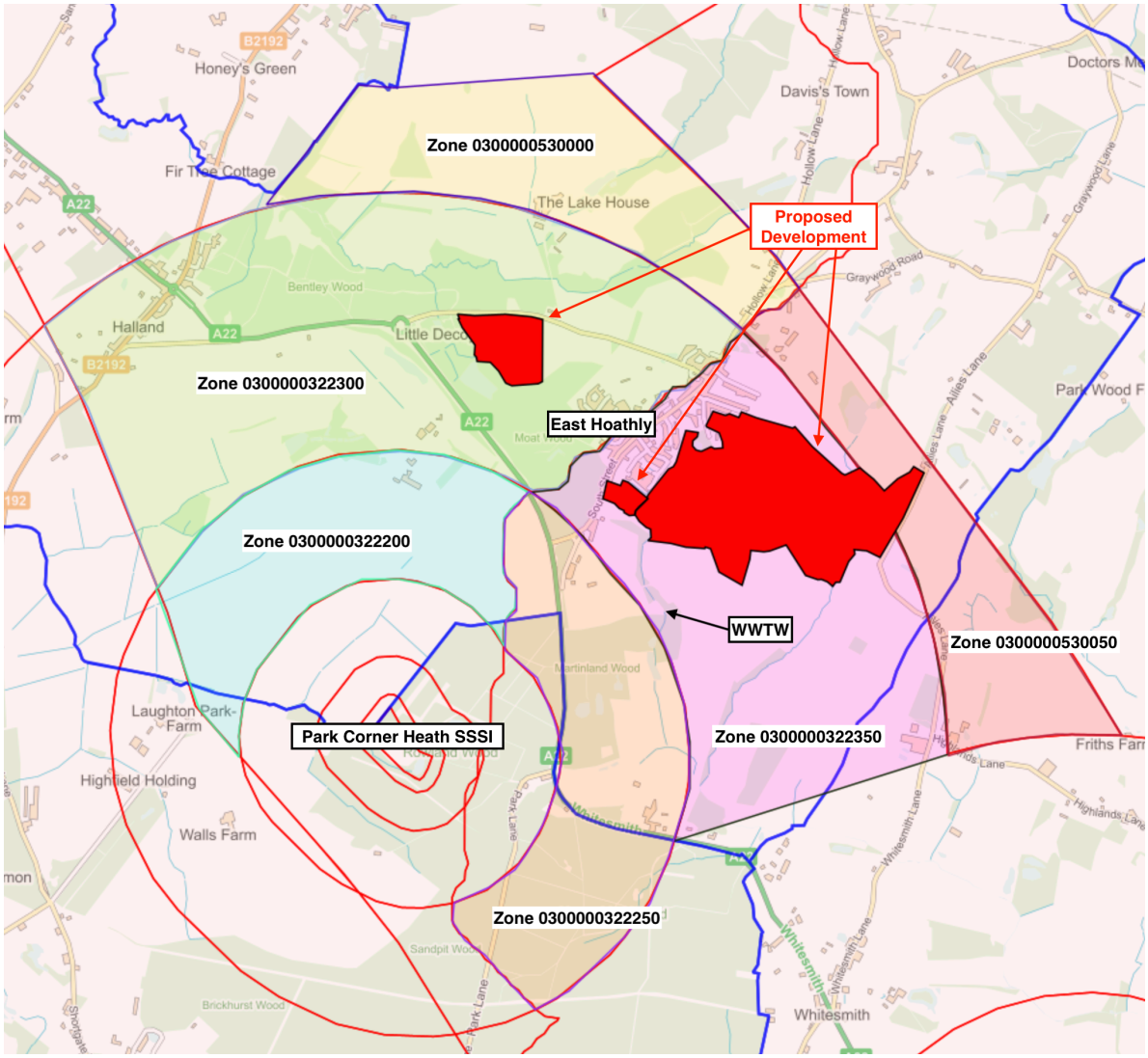
Park Corner Heath Site of Special Scientific Interest (SSSI)

a. WDC submitted a letter to Natural England dated 2 May 2025 which stated that the Planning Department had undertaken an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) in relation to this application. The Planning Department also completed an Environmental Impact Assessment Screening Matrix dated 2 May 2025.

b. The Government Guidance indicates that an Appropriate Assessment should be used to "determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it". The Appropriate Assessment does not mention the Park Corner Heath SSSI and therefore cannot have determined if the planning application will affect the protected features of the Park Corner Heath SSSI.

c. The EIA Screening Matrix does mention the Park Corner Heath SSSI but does not adequately assess the harm that would be caused if this planning application is approved. The area surrounding each SSSI is delineated into impact zones radiating out from the SSSI which indicate the potential harms that could impact the SSSI. These are shown on the following map. This shows the 6 zones that we believe would be impacted by the proposed development. The principal impact that would harm the SSSI is specified as: "Any discharge of

water or liquid waste of more than 20m³/day that is discharged to ground (ie to seep away) or to surface water, such as a beck or stream".



d. The applicant's Flood Risk Assessment indicates that the predicted runoff from the proposed sites would exceed 20m³/day and therefore have a harmful impact on the SSSI.

e. It is also probable that the existing East Hoathly WWTW (which sits in Zone 0300000322350) will require expansion as a result of the significant housing development being proposed. This could have an impact that would harm the SSSI, specified as: "General combustion processes >20MW energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/ gasification, anaerobic digestion, sewage treatment works, other incineration/combustion".

f. The SSSI IRZ User Guidance indicates that: "LPAs can use the SSSI IRZs to determine if a proposed development is likely to affect a SSSI and when to consult Natural England to seek advice". We do not believe that WDC has adequately used the SSSI IRZs to determine if harmful impacts will be caused by the proposed development.

g. The "possible" inclusion of the 4,441 houses to the West of Halland would also sit within the Park Corner Heath SSSI IRZs and the in-combination effects will add to the harm that would be caused by any proposed development.

East Hoathly Waste Water Treatment Works

a. East Hoathly Waste Water Treatment Works (WWTW) overflows on average 51 times a year. It is incapable of coping with the 279 homes already under construction. The proposal for 275 homes and a school for 400 children and staff should not be approved.

b. No upgrades are planned to reduce storm overflows for East Hoathly WWTW - it is certain that new housing will cause additional sewage discharges - thereby breaching the Environment Act 2021 for which Southern Water (SW) and Wealden District Council (WDC) will be liable.

c. SW consider applications for new housing on the capacity in dry weather. Ignoring the existence of rainfall allows all planning applications to be approved whilst SW and WDC both know that the existence of rain will cause significant additional sewage overflows and pollution.

d. The Headroom Treatment Capacity figures provided by SW do not add up. The 2013 Core Strategy figures state a capacity of 183 homes and SW are currently stating 247 homes, both of which are inadequate for the 279 homes already approved by WDC.

e. WWTW Permits specify when discharges can occur. Discharges are reported by SW yet these significantly exceed the number of occasions when the flow rates specified in the East Hoathly Permit are exceeded. These breaches should be scrutinised by WDC.

f. The Office for Environmental Protection (OEP) recently concluded that there have been failures to comply with environmental law in relation to sewer overflows. "We interpret the law to mean that they should generally be permitted only in exceptional circumstances, such

as during unusually heavy rainfall". WDC are currently granting consents based on dry weather capacity assessments made by SW. The East Hoathly Permit allows SW, once the storm tanks are full, to discharge untreated sewage regardless of the intensity of the rain. WDC should know this and accept liability for sewage discharges whenever they add housing to a WWTW that already overflows.

g. SW do not record the amount of untreated sewage discharged and Village Concerns believe that WDC should require this information. Water quality monitoring is not random (as it should be) and does not assess the quality of the watercourse following sewage discharges.

h. Sewage pumping for new housing is being approved by WDC without scrutiny or coordination with the existing network and will result in additional sewage discharges.

i. Odour assessments for nearby properties including those in the current application need to be based on the future scale of the East Hoathly WWTW.

j. These objections are more fully examined in our letter to WDC dated 10 July 2025. The overload on the East Hoathly WWTW will be further exacerbated by your allocation of 650 additional homes onto this network.

Interim Infrastructure Development Plan

9. This draft LP 2026 has not revised the supporting documentation from the 2024 consultation. This is a huge mistake as much has changed since 2024:

This draft LP 2026 has allocated the Owlsbury site for development of 1500 homes.

This draft LP 2026 has assessed the site to the West of Halland as a "possible" site for inclusion at the Regulation 19 stage of 4,441 homes.

10. To potentially allocate 5,941 additional homes on the A22 corridor requires a complete reassessment of the Interim Infrastructure Development Plan. In our comments on the draft LP 2024 we raised our concerns. Now, with this additional burden on the A22, our comments are even more important and we repeat them here:

Car Dependency

11. The draft LP 2026 does acknowledge that: "there is a heavy reliance within the district on the use of private vehicles for journeys" (Paragraph 3.11). The draft LP 2024 also notes that: "The NPPF states that if a local planning authority is to set local parking standards for new development, then the policy should take into account the accessibility of the development; the type, mix and use of the development; the availability of and opportunities for public transport provision, local car ownership" (Paragraph 9.46). However, it does not go on to say how WDC will assess local car ownership levels despite the evidence provided by this Parish as to the actual levels of car ownership in car dependent communities. It also should expand this to include other vehicle ownership at a local level. This should include work vehicles which are often large vans, leisure vehicles which can often be motor homes and caravans and trailers for leisure vehicles or boats. All of these things exist but at present WDC ignores their existence and where they will be parked.

12. The draft LP acknowledges that: "within Wealden 89.4% of households have access to one or more cars, which is significantly greater than the UK average of 74%. This is reflective of the rural nature of the district and the poor public transport infrastructure meaning that many residents currently have no alternative but to travel by car on a day to day basis". For East Hoathly the situation is even worse because of an even greater proportion of vehicles per household with local surveys showing this to be 2.24 per household.

13. The only real way of reducing car dependency in East Hoathly is to improve access to public transport. This is currently inadequate and even if it was substantially enhanced there is no evidence to suggest that its use will significantly increase or that it will reduce the level of vehicle ownership. In short, we do not believe the draft LP 2026 produces any effective proposals to reduce car dependency in this community. Building 650 more homes with the threat of 4,441 more will add to the level of car dependency within Wealden as a whole.

Traffic Congestion

14. The draft LP 2026 acknowledged that: "Several key junctions and roads on these corridors [A22] are currently at, or reaching capacity, and experience congestion and delay during peak hours" (Paragraph 3.12). The Interim Infrastructure Development Plan (IIDP) states: "In relation to the preferred growth strategy set out in the Regulation 18 Local Plan, the transport modelling research confirms that there are already existing link

capacity issues. Whilst several junctions will be subject to future upgrades, the capacity of the A27, A22 and A26 corridors to accommodate additional traffic growth would require mitigation in order to facilitate the growth proposed. Within these assessments a 10% modal shift25 was applied for more urban areas of the district with a 5% modal shift applied to the rural areas" (IIDP Part 2, Page 17). Village Concerns contests that a 5% modal shift is realistic for rural areas and would like to see the evidence to support these modal shift estimates.

15. The IIDP includes details of improvements to the A22 Corridor from Hailsham to Uckfield (IIDP Part 2, Page 13, Projects N3a and N3b). The Transport for the South East Strategic Infrastructure Plan 2023 also includes Project N18 - A22 Uckfield Bypass Dualling although this does not appear to be directly referenced in the WDC documents.

16. The IIDP also provides details of potential changes to the Halland and Shaw roundabouts (IIDP Part 2, Page 18). It indicates that congestion for both the Halland and Shaw roundabouts will increase from its current status of Yellow (indicating congestion is at or approaching 90-110% capacity) to Red (indicating that congestion will be greater than 110% capacity) by 2040. All of this is without the additional 5,941 houses to be added onto the A22.

17. The problem with all these schemes is that the IIDP Part 3 provides an assessment of the risk to the delivery of these items of infrastructure. It finds that the need for the Projects N3a and N3b including the roundabout enhancements are of Critical (the highest level) importance to the LP but that there is only a medium chance that they can be delivered. This is because they are uncertain, unfunded and the necessary land may not be available. It is also disappointing that Policy INF 5 seeks to prevent development that would compromise improvements to the A27 but has not included the A22. Village Concerns regards this as short-sighted for one of the districts most important strategic routes.

18. To reflect how important these unfunded schemes are, the Transport for the South East Strategic Infrastructure Plan 2023 states that:

> "if nothing is done to tackle these challenges in the south east the following outcomes are inevitable by 2050:
>
> - The number of car trips will grow 23%;
> -
> - the number of rail trips will (only) grow 31%;
> -
> - the number of bus trips will (only) grow 26%

-
- the number of active travel trips will decline 10%
-
- carbon emissions will (only) decline 35%; and
-
- structural inequalities and areas of deprivation will persist and restrict economic growth".

19. The closest rail link and town centre to East Hoathly is Uckfield. The IIDP states that: "Uckfield - highway network within the town is already very near capacity, resulting in town centre congestion issues, and it will struggle to accommodate a further increase in traffic" (IIDP Part 2, Page 16). The addition in the draft LP 2026 of Owlsbury and 4,441 homes in Halland will exacerbate this even further.

20. The IIDP also states: "Further consideration will also need to be given to the minor road network" (IIDP Part 2, Paragraph 7). This issue needs much greater consideration and should be covered in the draft LP. When main roads become congested, traffic migrates onto the rural lanes to bypass the congestion. The number of vehicles moving off the main roads to use "rat runs" may be small in terms of highways infrastructure but the effect can be devastatingly disproportionate.

21. The in-combination implications of Paragraphs 14 to 20 above are that the critical improvements to the roads are unlikely to materialise and with increasing car dependency, the road network and nearest town of Uckfield, cannot sustain the addition of any further housing in East Hoathly. The draft LP 2024 acknowledged (Paragraph 2.12) that funding was not allocated for any A22 improvements and the outcome of the Major Road Network's MRN) bid would not be known until 2025. The draft LP 2026 now repeats this but the outcome is not expected until 2026. There is no statement to indicate that the MRN bid has now included the addition of the allocation of 5,941 additional homes on the A22.

Bus Services

22. The IIDP specifies the levels of bus service (IIDP Part 3, Page 41) as:

a. 30% of settlements have very frequent bus service - 7 days a week, evening service and 30 min frequency and journey time to nearest town.

b. 25% of settlements have frequent bus service - 5 days a week and one hour frequency and journey time to nearest town.

c. 45% of settlements have extremely restricted bus service or no service at all.

23. Village Concerns believes that the language used in these descriptions is overly positive and mis-represents the situation. We advocate replacing very frequent with good, frequent with moderate and extremely restricted with poor. Using overly positive language is perpetuated by developers and allows phrasing of service availability that is not supported by reality or the views of the public.

24. The problems with the existing bus services are clearly laid out in the IIDP Part 2, Paragraph 5. It is hugely problematic that this starting point for bus travel is in such a parlous position before the impact of the draft LP is even considered. The IIDP states (IIDP Part 2, Page 55) that:

> "Early testing of the Regulation 18 Local Plan has identified the following key issues for public and sustainable travel:
>
> - The larger strategic sites on the A22 corridor between Hailsham and Uckfield, all have low to very low accessibility to public transport.
>
> - The accessibility along key transport corridors – A22, A27 and A259 – varies depending on the proximity to urban and local centres, such as Uckfield and Crowborough, the availability of rail connection and frequency of bus services".

25. The IIDP then goes on to propose suggested mitigations for the problems of inadequate bus services. Unfortunately, of the three Critical schemes covered in the IIDP Part 3, one is assessed as a high risk of not being delivered and another has a medium risk of not being delivered. Both are unfunded.

Active Travel

26. Enabling a modal shift to sustainable travel is included as a key objective within the draft LP 2024. For a remote rural village such as East Hoathly the only options for sustainable travel are:

Bus Travel

a. Bus usage in this village is very low. For those who use bus travel, it is really important, the problem is that very few people need or choose to use it. Local surveys showed that in a whole day (averaged for School Terms/Holidays), only 19 people from the Parish used the 54 Bus. The average number of people on the buses that passed through the Parish was 3 per bus (the majority of the buses were double decker with an average bus capacity of 66). Improving the bus service frequency, destinations and covering evenings and Sundays would improve matters marginally but we strongly believe that it will not amount to a modal shift for more than a few individuals.

b. Travel Plans are supposed to be audited to show if they have had any effect. Village Concerns does not believe that the Travel Plans that have been produced for this village have been audited and requests to see them have not been met. Village Concerns believes that Travel Plan audits should be sent to Parish Councils and made public. Only then can it be seen if the claims made by developers and accepted by planning departments have come to fruition. The existing level of bus usage suggests that they have failed spectacularly and should put into question the reliance on demanding yet more Travel Plans as a path to sustainable travel.

Walking

c. Walking to other villages or our nearest town is unlikely to be possible other than for a few people and use of roads would be unsafe. Irrespective of this, nothing is included in any ESCC or WDC plans to enhance local footpaths.

Cycling

d. Cycling to other villages or our nearest town is possible but again, only for a few people and the general view is that it would be highly unsafe either on the A22 and even on the smaller rural lanes which are often used as “rat runs” to escape congestion. Irrespective of this, nothing is included in any ESCC or WDC plans to provide any cycle lanes in this Parish or between this village and our nearest town.

27. The IIDP identifies four schemes for Active Travel in relation to this Parish, all of which are assessed as Essential but having a high risk of not being delivered. It is therefore futile to portray Active Travel as a solution to

sustainable travel for this village. There is no credible pathway to a modal shift and WDC should accept this. This is not to say that it should not be promoted as a sensible idea, but it should not be allowed as a justification to permit development based on an argument that an Active Travel policy will make the proposed development sustainable.

Local Employment

28. Non of the proposed sites for development in the Parish provide any new employment, in fact, only one site for the whole of Wealden in Policy SA1 Housing and Mixed-Use Site Allocations includes a mixed-use development. Most of the village employment sites have already been converted to housing. Failing to provide any new employment for the new homes in the Parish means more commuting, more pollution, more congestion and decreasing sustainability.

Education

29. The IIDP identifies that there will be a shortfall of places for Early Years and Primary Eduction within the plan period (IIDP Part 2, Page 75). It proposes a possible expansion of the existing provision. Part 3 of the IIDP indicates that this scheme is assessed as Critical but that it only has a medium risk of being delivered (IIDP Part 3, Page 15). However, in another section, it also indicates that there will be a shortfall of 5 places per year group emerging from around 2030/31. It notes that the existing school is on a very constrained site with limited scope for expansion. It assesses the scheme as Essential but with a high risk of not being delivered (IIDP Part 3, Page 40). Despite this WDC have now included in Policy EH2 land allocated for a Two-Form Entry Primary School. We are not aware of any acceptance that ESCC are funding this nor that a school for 400 children is required. Irrespective of this, the site proposed would put the school at the bottom of a 170 house estate that is a cul-de-sac with access issues.

Sports/Recreation

30. The IIDP completely ignores this Parish in terms of sports and recreation. It fails to mention the existence of East Hoathly's Sports Ground, football pitch, tennis courts, rifle range and cricket pitch. Our Neighbourhood Plan Steering Group have previously raised this matter with WDC and ESCC and notified them of the gaps in the depiction of this Parish in the WDC Playing Pitch and Outdoor Sports Strategy Report 2022. It is unacceptable that our facilities and the problems that exist with them are not covered in the IIDP as it means that WDC have proposed no infrastructure improvements to rectify the shortcomings in our facilities. The situation is

well explained in our Neighbourhood Plan. The omissions in the WDC Playing Pitch and Outdoor Sports Strategy Report 2022 have never been acknowledged and nothing published since gives us any confidence that WDC care about correcting this or providing this Parish with Sports and Recreation infrastructure/facilities support.

Infrastructure Summary

31. In summary, almost all of the Infrastructure changes that are proposed that would affect this Parish are assessed as Critical or Essential but carry a High or Medium risk of not being delivered. To propose any more development in East Hoathly would be irresponsible and unsustainable.

Public Examination

32. East Hoathly has again been designated as a venue for a LP Exhibition but we have not been designated (Table 1 of the draft LP 2026) as a venue where documents will be lodged for public examination. We asked for this to be corrected in 2024 and it was not done. It is probable that the draft LP 2026 will arouse significant public interest and we ask again, that you designate East Hoathly as a Document Venue.

Conclusion

33. Village Concerns has raised many objections relating to the harms being caused by development in this Parish. In this submission we have chosen to remind you of the specific harm being caused by housing causing more sewage to be discharged into watercourses and the harm being caused to the Park Corner Heath SSSI.

34. We are concerned that the draft LP 2026 seems to have nothing to say to the people of settlements such as Halland. This new draft contains the “possible” addition of a 4,441 house new town to the West of Halland. To include this without any consideration of the impact on Halland (and East Hoathly) and its current categorisation as an unsustainable settlement beggars belief. Building a new town in such a location is strategically nonsensical and is led on the greedy whim of a local farmer.

35. Village Concerns urges you to reconsider your allocation of 650 homes for this Parish. We strongly believe that the development you have already approved for this Parish is unsustainable and to add more without substantial improvements to local infrastructure is contrary to your LP Vision and the wording of your planning policies. If you do proceed with this Spatial Option, then we urge you to review the provision of infrastructure

improvements to make such an increase in housing sustainable and produce a planning led masterplan for the Parish and not a developer led frenzy. Most importantly, if cars are the only credible option for this community, you need to sort the roads out before you continue building.

Victoria Aldridge and Katherine Gutkind
Joint Chairs
Village Concerns