



Uckfield Town Council
'Focused' Local Plan (Regulation 18) Consultation

Response to Question 14:
Proposed new policies to be incorporated into the Local Plan

Requesting a policy: Housing - Brownfield First

To safeguard environmental constraints and heritage landscapes, development should use all brownfield sites and the register is updated. Proposed brownfield sites (numbers to be discussed if appropriate). Uckfield does not agree with the WDC proposed settlement boundary because a Brownfield first policy has not been adopted, using all brownfield space within the current boundary.

NPPF para 125.c give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

Until brownfields are re-used within Uckfield town, Uckfield will maintain safeguarding against harmful developments impacting environmental constraints and heritage landscapes and encroachment in heritage landscapes, development should therefore use all brownfield sites first.

In addition, Uckfield supports WDC paragraph Vacant Building 5.21 - This policy is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings. Redundant buildings increase the number of units available.

Proposed brownfield sites (estimate numbers to be discussed if appropriate)

Call for WDC to map these brownfield sites, including Bellbrook Business Park - refit to current standards rather than extend Ashdown Business Park.

Ridgewood Farm West of Uckfield has about 12000sqm expansion to provide Uckfield additional needs and is an approved application (not built).

Brownfield First - no new greenfield until town centre regeneration brownfield first				
Town Centre				
BT Building		45		Conservation Area sensitive designs parking underneath
Mojavo area regeneration - and area behind		35		
Behind Freeman Foreman		9		
Natwest Civic Approach		21		parking underneath
Community Hub area		15		parking underneath, with hub
Dominoes area		15		parking underneath
Behind Hartfields 1970s block regeneration and town square		21		parking underneath/beside
Road by Civic Centre, Bell Farm Lane		21		Brownfield , parking underneath - well designed to inform heritage
Other areas				
Lewes Road - derelict house/garden		9		listed building. Degraded and fire public house, non designated heritage asset
New Road - Public House		9		
Care Home - New Town		9		brownfield, former care home - residents requested bungalows, or a much reduced size of care home - live application no more than, may need to be reduced due to scale and site. Closed primary school also had nursery provision - assess nursery needs to town and family / workers
Holy Cross School		45	0	
		209	Brownfield - estimate	Brownfield FIRST - no more than. Policy no green fields until brownfield used

Requesting a policy: Hamlets

Green highlighted text references rely on other references, important in context and supports wording to improve policy information and define hamlets.

Introduction Local plan - Overall, our location, as well as our high-quality environment, landscape and heritage makes Wealden a very attractive place to live, work and visit.

Context and Issue In the local plan paragraph **2.2 reg 18 2026, it states** “We have 75 defined settlements, ranging from our larger towns of Hailsham, Crowborough, Uckfield, Heathfield and Polegate to a range of large villages, such as Forest Row and Wadhurst, as well as many other smaller villages and hamlets. In general terms, just over half of our residents (55%) live within our towns, with the remainder of our population (45%) living in our more rural areas. Overall, our location, as well as our high-quality environment, landscape and heritage makes Wealden a very attractive place to live, work and visit. “

Current shortcoming (Settlement Hierarchy) In paragraph 3.46 Sustainable Settlements and the Settlement Hierarchy — hamlets are not currently defined. This is an evidence gap that can be proportionately addressed to ensure the Plan is fully justified and effective

The Table 3 Draft Settlement Hierarchy is updated to clarify how hamlets are treated (for example, as part of the open countryside) and to set out clear criteria for their treatment in the settlement hierarchy.

Representation Uckfield Town Council welcomes the Council’s landscape-led approach. To ensure the Plan is effective and consistent with national policy, we request a short, principle-led policy recognising hamlets as part of the open countryside and a commitment to a phased programme to map and, where justified, designate hamlets and associated non-designated heritage assets during the plan period. This approach is proportionate, evidence-based

and will provide clarity for communities, applicants and decision-makers while safeguarding the district's distinctive historic landscapes

Wealden evidence and Character Uckfield Town Council requests a short policy framework to clarify the treatment of hamlets within the settlement hierarchy. As described in the High Weald AONB Plan (2024), hamlets occur around the junction of routeways or small commons (which became greens or forstals), or as clusters of cottages serving a particular industry; hamlets are typically unlit and contribute to intrinsically dark skies landscapes.

Character Statement Wealden contains hamlets, which are a defining feature of both the High Weald and Low Weald settlement patterns, hamlets are considered open countryside in planning terms, hamlets are not “villages” in planning terms - they are very small rural clusters that contribute to the rural character of Wealden, particularly within the High Weald's dispersed medieval landscape and the Low Weald's farm-cluster pattern.

Seeking to conserve areas with high levels of tranquillity and the settlement pattern of small, scattered hamlets identified as a predominantly rural area. Maintain and enhance the distinctive pattern of dispersed settlement of historic hamlets, hamlets are typically unlit contributing to intrinsically dark skies landscapes, historic hamlets are an intrinsic part of the distinct and picturesque landscape.

Policy Context and Rationale High Weald Objective S1 To protect the historic pattern and character of settlements. **Rationale** To protect the distinctive character and landscape settings of towns, villages, **hamlets** and farmsteads, remove despoiling influences, and maintain the hinterlands and other relationships (including separation and green infrastructure) between settlements that contribute to local identity.

To deliver the High Weald objective consistently, the Plan should include a proportionate hamlet policy and mapping commitment (Reference <https://highweald.org/document-library/aonb-management-plan/high-weald-aonb-management-plan-2024-2029/?layout=default>)

In addition, the High Weald policy framework states: **Historic Built Environment in the High Weald AONB**
The historic environment is fundamental to the distinctive character, sense of place and natural beauty of AONBs. The rich built heritage greatly informs the character of the High Weald AONB; historic hamlets and farmsteads are an intrinsic part of the distinct and picturesque landscape, with the rolling pastureland and small ancient woodlands of the countryside interspersed with the rich clay-tiled roofs of historic buildings. Along with the domestic building stock of farmhouses and cottages, building typologies reflect locally distinct historic agricultural practices, for example the distinctive brick roundels of the hop industry's oast-houses, fine timber-framed barns and modest brick cowsheds, dairies and outbuildings. National planning policy places great importance on the conservation of these Heritage Assets (Chapter 16 of the NPPF) which can be classified as:

- **'designated'** – i.e., those benefiting from statutory designation, such as Listed Buildings and Conservation Areas, and
- **'non-designated'** (NDHA)– other historic features and structures which contribute positively to the physical, historic and socio-cultural character of the area, and which warrant retention and interpretation, and which can be identified in 'Local Lists' (prepared by LPAs or via Neighbourhood Plans), or during the decision-making process.

UTC proposal. UTC therefore proposes to include a policy safeguarding small heritage hamlets as they are unique and different from towns and villages. Uckfield Town Council requires hamlets to be described in the plan as historically important and as irreplaceable finite heritage; evidence confirms hamlets represent ancient countryside and unique landscapes which should be safeguarded and conserved, the local plan policy defines hamlets treated as important heritage assets implicitly as open countryside rather than a missing item in the formal settlement tier. Ensuring the plan fairly reflects lived settlement patterns, respects local identity and tranquillity, and meets the tests of soundness. Across both the High Weald and Low Weald, hamlets function as part of the rural, open countryside, and parishes would expect long-term plans to respect their character, and the scale, historic grain, and lack of formal facilities.

Further evidence is described in the National Character Area High Weald 122 (NCA122) as characterised by dispersed historic settlements of farmsteads and hamlets. “A *hamlet is a very small, historic rural settlement*

characteristic of the medieval landscape of the High Weald National Character Area". The local plan has not defined the finite heritage interests and landscapes of hamlets in Wealden, relying solely on supplementary evidence risks inconsistent application over a 17-year plan period; a plan-level principle with a time-bound mapping programme provides the necessary certainty.

Character descriptions. **Historic England** and **Oliver Rackham** identify hamlet areas as part of the '*Ancient Countryside*' or *ancient landscapes*, underscoring their historical importance and the need for explicit recognition in settlement descriptions.

- In the **High Weald character area** : hamlets reflect a medieval dispersed settlement pattern: loose groupings of historic farmsteads, medieval hall or cottages and converted agricultural buildings set within ancient routeways, ghyll woodlands and small, irregular medieval fields or commons. They have no defined centre, no services, and a scattered, low-density form that blends into the wooded, rolling topography.
- Hamlets also pre-date modern parish boundaries and therefore require explicit recognition and mapping so their historic form and landscape setting are identified, understood and protected.
- In the **Low Weald character area** : hamlets tend to form around farm clusters, lanes, and historic crossroads, often more open in character due to the broader clay vale landscape. They remain small and service-less, but their pattern is typically less wooded and less topographically enclosed than in the High Weald.
- Across both landscapes, hamlets are considered part of the open countryside in planning terms, with development expected to respect their scale, historic grain, and lack of formal facilities.

The National Character Area 121 Low Weald describes hamlets as follows :-

- By the medieval period much of the Low Weald was being managed as a patchwork of assart fields and woodlands with dispersed manorial farms and market settlements, many of which developed into modern-day villages and hamlets
- Identified as an additional opportunity to plan for the creation of high-quality blue and green space and green corridors to provide a framework for new and existing development in urban areas and along major transport routes for the enjoyment and wellbeing of communities and to enhance biodiversity.
 - Seeking to conserve areas with high levels of tranquillity and the settlement pattern of small, scattered villages and hamlets of this predominantly rural area.
 - 8.1 Settlement pattern Small hamlets and dispersed, ancient farmsteads and farmstead clusters form the predominant element of the settlement pattern. There are some small hamlets centred on greens or commons.
- Sense of history;
 - Historic field patterns and boundaries.
 - Ancient woodland.
 - There are manor houses, often medieval in origin and smaller historic designed landscapes in the grounds of country houses.
 - The area is rich in industrial archaeological sites, particularly relating to the Wealden iron industry.
 - The landscape is essentially medieval in structure with generally small fields, hedgerow boundaries, woodland peppered with farmsteads, small hamlets and villages.
 - Much of the woodland is ancient and veteran trees are a feature of parklands, villages and isolated in fields.
 - Encourage protection of characteristic field patterns and boundary features, and ancient pathways.
 - Strong sense of being an anciently settled and farmed landscape, with farmsteads (often of medieval origin) set in landscapes also enclosed in the medieval period and successively reorganised. The historical pattern of field enclosure and assarting from woodland remains mostly intact.
 - promote the appreciation and understanding of the area's historic sites and nationally important (industrial) heritage.

Heritage Significance. A plan-level hamlet principle, supported by a proportionate mapping programme, will provide the clarity inspectors expect and demonstrate the Council has responded constructively to consultation feedback.

For relevance ancient woodland is defined as irreplaceable known from the 1600s, hamlets are often older than ancient woodlands and therefore should be considered along these lines as irreplaceable heritage interests, they are ancient and are often older than ancient woodland. Reference historicengland.org.uk.

Soundness and plan-making. The absence of a hamlet definition creates an evidence gap at a time when the NPPF consultation places increasing emphasis on landscape-led planning, settlement hierarchy, clarity, and proportionate rural development. This can be addressed by the inclusion of a policy and mapping hamlets in the life of the plan, and consideration of future Conservation Areas.

Development affecting hamlets should be small-scale, landscape-led and demonstrably rural in form; the Plan should set proportionate tests to guide decision-making.

Conclusion: Why a Hamlet Definition should be Included in the Wealden Local Plan. The emerging national policy framework and recent appeal decisions make it increasingly important for Local Plans to provide clear, locally-specific definitions of settlement types, including hamlets. The NPPF consultation (2024–25) places renewed emphasis on directing growth to sustainable locations, distinguishing between settlements with services and those without, and ensuring that development in the countryside is genuinely rural, small-scale, and landscape-led. A clear, locally-specific definition will enable consistent, proportionate application of the Wealden Plan’s landscape and heritage objectives, aligning with the NPPF 2025, and NPPF consultation 2026.

Including a definition and a principle-led policy for hamlets will: Ensure the Local Plan is sound by identifying hamlets as part of the district’s settlement hierarchy and sense of place. Enable communities at Regulation 19 to confirm ancient hamlets, ensuring the plan reflects local knowledge and historic settlement patterns. Align the Local Plan with the direction of the emerging NPPF and national policy. Provide clarity and certainty for applicants, communities and decision-makers. Ensure proportionality so that hamlets are not treated as villages simply because they contain a small cluster of dwellings.

Heritage assets and plan-making. Heritage assets are an irreplaceable resource; the Plan must conserve and enhance the historic environment and identify the main heritage features within the plan area. To deliver a positive strategy for the historic environment, hamlets should be identified in the Plan where they demonstrate historic interest. Identifying hamlets at plan level ensures avoidance of harm, enables enhancement where appropriate, and is proportionate given the unique and finite landscapes they represent. This approach aligns with the Plan-making Framework (PM8: evidence that is relevant and proportionate; PM13: place-making standards; PM14: spatial strategies) and national policy objectives to contribute to sustainable development and to protect and enhance the natural and historic environment. **Policy weight:** The development plan is the primary source of decision-making. If hamlets are only in supplementary evidence they lack the plan-level policy parishes and decision-makers need.

Supporting Text. In the **Oxford English Dictionary** sense hamlets are described as — a small rural settlement without its own church, typically smaller than a village and containing only a handful of dwellings.

Historic England refers to “medieval hamlets are standing somewhat separate from villages, hamlets ...areancient countryside “The landscapes have always been thought to be longer established, and Oliver Rackham has labelled these the Ancient Countryside”

The Glossary of the emerging new NPPF consultation describes hamlets; **Settlement:** Includes cities, towns, villages and other predominantly built-up areas, including land which is allocated or has permission for development which will form part of the built-up area once the development is complete. This includes areas defined as a settlement in the development plan (whether using defined settlement boundaries or equivalent terms, or criteria for identifying settlement extents). Settlements do not include hamlets and scattered groups of houses located outside predominantly built-up areas, unless specifically defined as a settlement in the development plan.

Therefore, in Wealden, hamlets should be defined and located outside the development boundaries and built-up areas.

Policy update. Hamlets plan-led outcomes; Conservation Areas within the Local Plan

Update the Historic Environment policy section and improve options to consider new Conservation Areas in the plan recommended by parish councils for review.

The Local Plan should adopt a clear principle that hamlets demonstrating coherent historic character, finite heritage resources to protect and enhance the landscape-led evidence, will be identified and considered for Conservation Area, because of its special historic interest. Thus taking into account the unique landscapes to accurately reflect the area within parish boundaries, during the plan period. The Council should publish the policy intent at Regulation 19 and implement a phased programme with landscape experts and parish councils to map the Wealden hamlets; this principle-led approach establishes the policy now while allowing details to be confirmed through the plan period. This also assists in accounting for and “predicting unknown heritage assets” implicitly, as described in the incoming new NPPF 2026. Therefore, including hamlets leads to a positive, appropriate, effective, consistent approach which is realistic and justified as part of plan making and wider spatial strategies.

Parish opt-in: The Council will work collaboratively with each parish and publish criteria and a timetable at Regulation 19 for parishes who wish to submit candidate hamlet evidence. Any parish may request mapping and NDHA assessment for hamlets within its area; the Council will validate submissions through a phased, parish-led programme during the plan period. Hamlets will be identified on mapping systems within Wealden.

National policy alignment: The proposed hamlet policy and mapping programme is consistent with the draft National Planning Policy Framework’s emphasis on landscape-led plan-making, the protection and enhancement of the historic environment, and the need for locally-specific settlement definitions to direct growth to sustainable locations. The policy is proportionate, evidence-led and will help demonstrate the Plan is positively prepared, justified, effective and consistent with national policy

Requesting a policy: Settlement Green Gaps

Short policy summary - Uckfield requests Settlement Green Gaps as a suitable and justified policy, used by other districts.

Settlement Green Gap principle

The Local Plan should recognise and safeguard **Green Settlement Gaps** — defined areas of predominantly undeveloped land between settlements where development would materially reduce separation, harm landscape or heritage setting, or interrupt ecological connectivity. Gaps are part of the open countryside and are not normally locations for general housing or increased growth; the Plan will publish objective criteria and a phased, parish-led mapping programme at Regulation 19 to identify candidate gaps for validation and work with parish councils to secure these important green gaps, often as local green space.

Question 1 Spatial Strategy Improvement - Policy Green Settlement Gaps

1. **Purpose:** To prevent harmful coalescence of settlements, protect countryside setting and settlement identity, conserve landscape and heritage values, and maintain ecological and recreational corridors.
2. **Definition:** A **Green Settlement Gap** is a defined area of predominantly undeveloped land between two or more settlements where development would materially reduce separation, harm landscape character or setting, or interrupt ecological connectivity.
3. **Status:** Gaps form part of the open countryside for plan-making purposes and are not normally locations for general housing growth.
4. **Development tests:** Proposals within a candidate or designated gap will only be permitted where the applicant demonstrates that the development:
 - a. would not materially reduce the physical or visual separation between settlements;
 - b. would conserve or enhance the landscape and heritage setting of adjacent settlements;
 - c. would not harm ecological networks, green corridors or connectivity;
 - d. is essential for genuine rural needs, is small-scale and landscape-led, and cannot reasonably be located within a defined settlement boundary or on suitable previously developed land; and

- e. includes appropriate mitigation and, where necessary, compensatory measures for any residual harm.
5. **Exceptions:** Limited exceptions may be made for small-scale rural enterprise or agricultural buildings, biodiversity net-gain projects, habitat banks, nature recovery initiatives and heritage-led conservation or enhancement, subject to proportionate landscape, heritage and ecological assessment.
 6. **Implementation:** The Council will support parishes by providing settlement green gaps, publish objective criteria and candidate gap boundaries at Regulation 19 and will adopt a phased, parish-led mapping programme to confirm boundaries during the plan period.
 7. **Parish opt-in:** Any parish may submit candidate gap evidence for validation under the Council’s published methodology; validated submissions will be considered through the phased programme. The Council will give weight to maintaining settlement separation when considering proposals affecting candidate or designated gaps.

Paragraph for representations (NPPF/PPG aligned). The proposed Green Settlement Gap policy is consistent with the draft NPPF’s emphasis on landscape-led plan-making and locally specific settlement definitions. It is proportionate and evidence-led: candidate boundaries can therefore be identified using objective criteria (historic continuity; visual/physical separation; NCA/AONB overlays; green/blue infrastructure; ecological connectivity; NDHAs etc) and confirmed through a phased, parish-led programme so the policy is positively prepared, justified, effective and consistent with national policy, supporting the local parish representations.

Evidence - Lewes Local Plan -- “DRAFT Strategic Policy SDS6: Strategic Green Gaps

The Phase 1 consultation document included wording within Policy NE5 proposing strategic green gaps. The responses to the consultation have been reviewed and the policy wording updated. The policy has been amended to include a further proposed green gap between Haywards Heath and Burgess Hill (within the Local Plan area). A number of other areas were suggested for consideration as strategic green gaps but are not being proposed for allocation. A list of these suggested green gaps is included in Appendix 03.

DRAFT Strategic Policy SDS6: Strategic Green Gaps

1. Areas between the following settlements as shown on the policies map are designated as strategic green gaps and will be protected in order to retain the separate identities and character of these settlements:

- a. Land between Newhaven and Peacehaven
- b. Land to the north of Ringmer and west of Broyle Side
- c. Land between Newick and North Chailey
- d. Land between Haywards Heath and Burgess Hill

2. The purpose of Strategic Green Gaps is to:

- a. provide long-term protections from coalescence.
- b. retain the separate identities of settlements.
- c. protect settlements’ open or rural settings.

3. Within designated green gaps, minor development proposals (extensions to existing buildings or new ancillary buildings) may be supported where the purpose and function of the Strategic Green Gap is not undermined, individually or collectively, including the physical or visual separation of settlements.

Why do we think we need this policy

The spatial strategy seeks to manage growth in the most sustainable locations to ensure that the most valued and sensitive land is protected.

Maintaining green gaps between settlements has been long standing in the Local Plan area, where settlement boundaries have been used to make a clear distinction between town and village locations and the countryside. The

purpose of settlement boundaries has been to positively focus growth within settlements while protecting the character and beauty of the countryside.

Between the coastal towns the open landscapes create a sense of travelling between the urban areas. The open landscapes are important for recreation and nature and for maintaining the identity of the separate settlements. In the north of the district, while some settlements are in close proximity, they maintain separate identities to which their rural settings are vitally important.

Although the primary function of the green gaps is to avoid coalescence they have secondary benefits for biodiversity, green infrastructure and flood mitigation and storage.

While these areas are protected by Policy SDS3 Settlement Boundaries it is considered that the strategic green gaps policy is of additional value, helping to ensure that development that is otherwise appropriate in the countryside does not contribute to coalescence and the character of the settlements is maintained.

The strategic green gaps in whole or in part, consist of sites that have been assessed as part of the Land Availability Assessment for development potential. The gaps have not been treated as absolute constraints to development, nor are they proposed to avoid meeting our development needs.

Evidence (note Natural England support this policy)

It should be emphasised that the strategic green gaps are not defined on the basis of landscape quality, although they may contain areas of high-quality landscape, nor because they contain historic features or afford strategic or significant views. They are countryside that is predominantly green open space that is free from development and treated as open countryside by the existing Lewes Local Plan.

What did you tell us about the policy direction?

Natural England - Supportive of the policy aims, particularly the retention of a green gap between Newhaven and Peacehaven but raised concerns about potential conflict between this policy and proposed site allocations.

East Sussex County Council - Supported the policy approach.

Wealden District Council - Noted that, to avoid creating additional constraints to development, all options for housing and employment growth should be considered before introducing a green gap policy.

Parish Councils - Parish councils were generally supportive of the policy aims and for the green gaps included, and a further green gap was proposed to protect both Haywards Heath and Burgess Hill. Several councils suggested that areas under speculative pressure within the immediate setting of the SDNP should be designated as 'green buffers', and concerns were expressed that proposed site allocations would conflict with this policy, enabling coalescence between settlements. It was noted that evidence to support selection of these areas, setting out which areas have been reviewed, discounted, and the reasons why, should be available. It was also suggested that clear criteria for establishing, protecting, and adjusting green gaps should be set out, to reduce risk of development through 'exceptional circumstances' clauses.

Interest Groups - Sussex Wildlife Trust and the Ramblers Association were supportive of the policy aims. Railfuture supported the green gap proposed between Ringmer and Broyle Side.

Public - People were generally supportive of the policy aims and for each of the green gaps included. Several other green gaps were proposed between: Cooksbridge, Old Cooksbridge (Conservation Area), Hamsey, Offham, and North End; Newhaven and Seaford; Bishopstone and Seaford; Saltdean and Telscombe Cliffs; and Plumpton and East Chilmington. Some people suggested that areas under speculative pressure within the immediate setting of the SDNP should be designated as 'green buffers'. Many people expressed concern that proposed site allocations would conflict with this policy, enabling coalescence between settlements.

It was noted that evidence to support selection of these areas, setting out which areas have been reviewed, discounted, and the reasons why, should be available. A few people proposed that clear criteria for establishing,

maintaining, and adjusting green gaps should be set out, along with a definition of 'coalescence' in relation to green gaps, to prevent misinterpretation and reduce risk of development through 'exceptional circumstances' clauses. It was also noted that boundaries should be clearly defined and large enough to maintain a gap.

Industry Respondents - Noted that all options for housing and employment growth should be considered before introducing a green gap policy.

Is any further work required to justify the policy?

None.

How has the policy changed since the Phase 1 publication?

An additional green gap location has been identified and included within the policy, land between Haywards Heath and Burgess Hill. No significant wording changes have been made to the policy. The following issues were raised through the consultation:

- All available options for housing and employment growth should be explored prior to designating green gaps.

The Lewes land availability assessment (LAA) is a detailed evaluation of the potential of land within the district for development. It assesses the suitability, achievability, and availability of sites put forward for allocation for a range of uses within the local plan and has included assessment of sites within the proposed green gaps where they have been submitted for assessment.

- Potential conflict between this policy and proposed site allocations.

The proposed areas of the strategic green gaps will consider the proposed allocations and development potential.

- Criteria for establishing, protecting, and adjusting green gaps should be set out.

The supporting text provides the justification for the green gaps proposed. When the green gap boundaries have been defined, it is not intended that these will be adjusted. This policy is intended to safeguard those settlements most at risk of coalescing.

- Additional green gaps proposed.

These are included in Appendix 03

- 'Green buffers' proposed within the immediate setting of the SDNP.

Weight is already given within the NPPF to avoiding or minimising the impacts of development upon the setting of the SDNP. The policy context to protect the setting of the SDNP already exists. “

Policy title: Local Green Space Designation and Call for Sites **Policy text:** This policy prevents harmful coalescence, protects settlement identity, and maintains ecological corridors. Wealden District Council will run a Local Green Space (LGS) Call for Sites (as exemplified by neighbouring authority Lewes District Council increasing community engagement in the local plan consultation by identifying potential LGS) to identify and map green areas of particular local importance. Sites submitted through the Call for Sites will be assessed against the NPPF tests and the Council's LGS designation methodology. Local Green Spaces will be treated as part of the open countryside and are not normally appropriate locations for general housing growth; allocations that would cause harmful coalescence or materially reduce ecological connectivity will be avoided.

Neighbourhood Plans. In addition to the district-wide Call for Sites, neighbourhood plans remain a vital and complementary route for nominating Local Green Space under the NPPF; communities progressing neighbourhood plans should be encouraged to identify, evidence and map locally valued sites so designations can be secured through examination and referendum. This dual approach ensures parishes that are actively preparing neighbourhood

plans retain direct control over nominations while also allowing those not preparing plans to participate via the Wealden Call for Sites, promoting consistency of evidence, boundaries and GIS mapping across the district. This strengthens the case at Regulation 19 and demonstrates clear cooperation between parish stakeholders and Wealden council.

Lewes District Council also provided a summary of their districts Local Green Space (LGS), UTC encourages Wealden to adopt the [arcGIS.com](https://arcgis.com) mapping portal and place all these LGS on the maps.

Requesting a policy: Local Green Spaces

The following is included in neighbouring district and UTC requests similar for Wealden parishes.

A Local Green Space (LGS) designation is a way to provide special protection against development for green areas of particular importance to the local community. Paragraph 106 of the [National Planning Policy Framework](#) states;

The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as a Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

Further paragraph 107 sets out the criteria for assessment of a Local Green Space designation:

The Local Green Space designation should only be used where the green space is;

1. in reasonably close proximity to the community it serves;
2. demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historical significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
3. local character and is not an extensive tract of land.

The local plan recognises the benefits that the local environment has on the wellbeing of residents, their physical as well as mental health and the value therefore that the community puts on the environment.

All green spaces hold value for the community and/or nature. If a site is not assessed for Local Green Space designation, or is assessed as not meeting the criteria, this does not imply it lacks value or that development would be acceptable.

Lewes Local Plan consultation describes The Local Green Space Designation Methodology identifies sites that will be considered for Local Green Space Designation. These are viewable on this [webmap](#).

Lewes Local Plan consultation describes the Lewes District Local Green Space Call for Sites

Suggest a site for assessment as a Local Green Space.

“If you are aware of a site you would like the Council to consider for Local Green Space (LGS) designation in the Lewes District Local Plan then please complete this form and provide evidence of how the site meets the criteria set out in the [Local Green Space Designation Methodology 2025](#).”

If the site is within an area designated as a Neighbourhood Area for the purpose of Neighbourhood Planning, then the District Council may provide the relevant Town or Parish Council with a copy of the completed submission form and any documentation submitted. The Lewes District Local Plan covers only the area of the District outside of the South Downs National Park, sites within the National Park cannot be considered for designation within the Lewes District Local Plan.

Requesting a policy: 50m starting buffers for Ancient Woodland

We support adjacent neighbouring authority Lewes District Council with 50m buffers for ancient woodlands.

[https://planningpolicyconsult.lewes-](https://planningpolicyconsult.lewes-eastbourne.gov.uk/LP_DefiningPolicies25/viewCompoundDoc?docid=15665236&partid=15668436)

[eastbourne.gov.uk/LP_DefiningPolicies25/viewCompoundDoc?docid=15665236&partid=15668436](https://planningpolicyconsult.lewes-eastbourne.gov.uk/LP_DefiningPolicies25/viewCompoundDoc?docid=15665236&partid=15668436) and request the same in the Wealden proposals at regulation 19 for the Natural Environment, trees and woodlands policy..

Improve Natural Environment Outcomes in Wealden. In our opinion, standard 15 or 25m is insufficient in our locality and Wealden now requires more than 50m to address direct and indirect impacts which is proportionate to the experience of Uckfield Town Council and the rangers managing the impacts of site developments in close proximity to ancient woodland. It is deemed that 25m is inadequate in our opinion, as this does not address heights of ancient woodland trees, or the type of edge effects to the edges of our ancient woodland, such as those described by Richard Hellier ([Why woodland edge matters – Forestry Commission](#))

Evidence - Unleashed: walking dogs off the lead greatly increases habitat disturbance in UK lowland heathlands | Urban Ecosystems | Springer Nature Link

Recommendation from E&L - Uckfield plans committee request 50m safeguarded starting buffers on major applications of more than 9 dwellings as standard policy.

Uckfield Town Council requests that Wealden District Council adopt a **50 metre buffer policy for ancient woodland** as the preferred district standard. This measure is proposed as a sound and proportionate update to the Local Plan to prevent edge effects, avoid fragmentation and protect irreplaceable habitats during a period of growth, protecting light noise direct and indirect disturbance or trampling of important ancient woodland ground flora. No new footpaths will be added to ancient woodland, the preference being to remove the indirect impacts of increased visitor disturbance and dog walking.

The 50m buffer is proposed as the **preferred starting point for development sites of more than 10 dwellings**, with larger buffers applied where site-specific assessment demonstrates impacts extend beyond 50m. This approach follows neighbouring practice and provides a clear, consistent basis for decision-making that reduces repeated debate about variable buffer distances and strengthens the plan's defensibility at Regulation 19 and examination.

Policy wording

Ancient Woodland Buffer Policy

Development proposals must provide a minimum **50 metre buffer** between new development and the boundary of ancient woodland, unless a site-specific ecological assessment demonstrates that a different distance is required to avoid harm. Any buffer should be designed to contribute to wider ecological networks and form part of the area's green infrastructure. SuDS, drainage features and other engineered interventions must be located outside the buffer where they would create hydrological connectivity with ancient woodland habitats. Rights of way and recreational access that would materially increase visitor pressure, dog disturbance or other recreational impacts within the buffer will be resisted, and are preferred outside the 50m buffer. Where development proposals are likely to affect bat foraging or commuting routes, buffers should be designed to maintain and enhance linear connectivity and include the irreplaceable habitat and a core sustenance zone linking GBI, Functionally Connected Land and ensure ancient woodlands are not surrounded, fragmented or further isolated by development.

The Lead Local Flood Authority will assess SuDS proposals on the basis that drainage features must not create direct or indirect hydrological impacts within the buffer zone, including ancient wet woodlands and ghyll habitats.

Why 50m is justified and necessary;

- **Evidence from local experience:** Uckfield's rangers report repeated instances where development brought hard edges and recreational pressure too close to ancient woodland, requiring remedial management (tree pollarding, removal of hazardous trees, and visitor management). Local experience demonstrates that 15m and 25m buffers have not prevented direct or indirect harm in practice.

- **Ecological function and species needs:** Ancient woodland contains long-lived trees and structural features (including standing and fallen deadwood) that require a wider fall and root protection zone; mature oaks commonly have crowns and root protection needs that extend well beyond 25m. A 50m core sustenance zone better protects these features and the species that depend on them.
- **Preventing fragmentation and edge effects:** A 50m buffer reduces the risk that woodlands become isolated or developed on multiple sides, which increases edge microclimate effects, invasive species colonisation, and disturbance. Maintaining a continuous green infrastructure (GBI) and functional ecological corridors is essential to long-term resilience.
- **Recreational disturbance:** Peer-reviewed evidence shows off-lead dogs substantially increase disturbance to sensitive habitats; increased visitor pressure from nearby development is a demonstrable pathway of harm. A 50m buffer provides a more robust separation to reduce disturbance and protect core woodland functions.
- **Hydrological protection:** Wet ancient woodlands and ghyll habitats are particularly sensitive to changes in drainage and groundwater. Locating SuDS and drainage outside a 50m buffer reduces the risk of altered hydrological regimes that can degrade these irreplaceable habitats.
- 50m will provide a fall protection zone for ancient woodland trees, for example, oak trees reach maturity of 30-40m and should be allowed to thrive and not be managed. Ancient woodland requires dead and dying trees and falling dead trees for biological ecosystems and ground flora.

Practical implementation and tests

- **Trigger threshold:** Apply the 50m buffer as the preferred default for proposals of **more than 10 dwellings** and for any development that would materially increase recreational access or hydrological load near ancient woodland. For smaller proposals, apply the same assessment tests and require proportionate mitigation where necessary. 25m is the preferred option for less than 9 houses.
- **Core sustenance zone and impact risk zone:** Define the buffer as a **Core Sustenance Zone (minimum 50m)** with an adjacent **Impact Risk Zone** where further assessment is required. The Impact Risk Zone distance should be set by local evidence and site assessment.
- **SuDS and drainage:** Require LLFA sign-off demonstrating that SuDS and drainage features are sited and designed so they do not create hydrological connectivity into the buffer or ancient woodland. SuDS features should be located outside the buffer unless independent hydrological modelling demonstrates no adverse effect.
- **Rights of way and visitor management:** Resist new or intensified access routes that would increase dog disturbance or trampling within the buffer. Where access is permitted, it requires management measures (signage, dog control measures, defined routes, seasonal restrictions) and monitoring and will be supported by the development to improve outcomes outside the red line boundary where likely effects of visitor harm are identified.
- Hedgerows linking ancient woodland will not be fragmented as linear habitats provide foraging and commuting for rare species reliant on the connectivity of irreplaceable habitats such as ancient woodland.
- **Assessment and evidence:** Require a proportionate ecological impact assessment for any proposal within the Impact Risk Zone, including the height of the trees of the ancient woodland impacted, the canopy size will often require bigger buffers, the tree root protection plans should be from the drip line of the canopy, hydrological assessments will not flow into ancient woodland or ghylls or wet woodlands, recreational impact assessment and bat activity surveys where relevant. The CSZ protects local or county relevant populations of endangered bats, and will be assessed as part of the developable area outside the 50m zone.
- **Mitigation hierarchy and avoidance:** Demonstrate avoidance and minimisation before considering mitigation or compensation or reducing the 50m buffer area. Where harm cannot be avoided, proposals should be refused unless very special circumstances can be demonstrated in line with national policy.
- **Monitoring and enforcement:** Require a monitoring and management plan for any permitted development adjacent to ancient woodland, with clear triggers for remedial action and long-term stewardship arrangements, and support conservation and management impacts outside the red line boundary.
- BNG of 20% on site can also be directed to these important 50m buffers where relevant and suitable for the edge habitats supporting the ancient woodland.

Adopting a 50m minimum buffer for ancient woodland is a proportionate, evidence-led policy update that will reduce edge effects, protect irreplaceable habitats and provide consistent, defensible policy for plan-making and development management. It aligns with the Local Plan's vision of **people and nature thriving together**, supports the integrity of

nature networks and gives officers, parishes and inspectors a clear, practical test to apply when assessing proposals adjacent to ancient woodland. Uckfield Town Council can supply the local evidence necessary to demonstrate why smaller buffers have failed in practice and why a 50m approach is now required in Wealden for sound plan-making. Uckfield found this policy proportionate and sound for our experiences managing ancient woodland impacted by cumulative developments in the area, and reducing or removing potential direct and indirect effects is important for irreplaceable habitats.

Evidence - supporting the Lewes District Council Local Plan includes 50 metre ancient woodland buffers as a starting point.