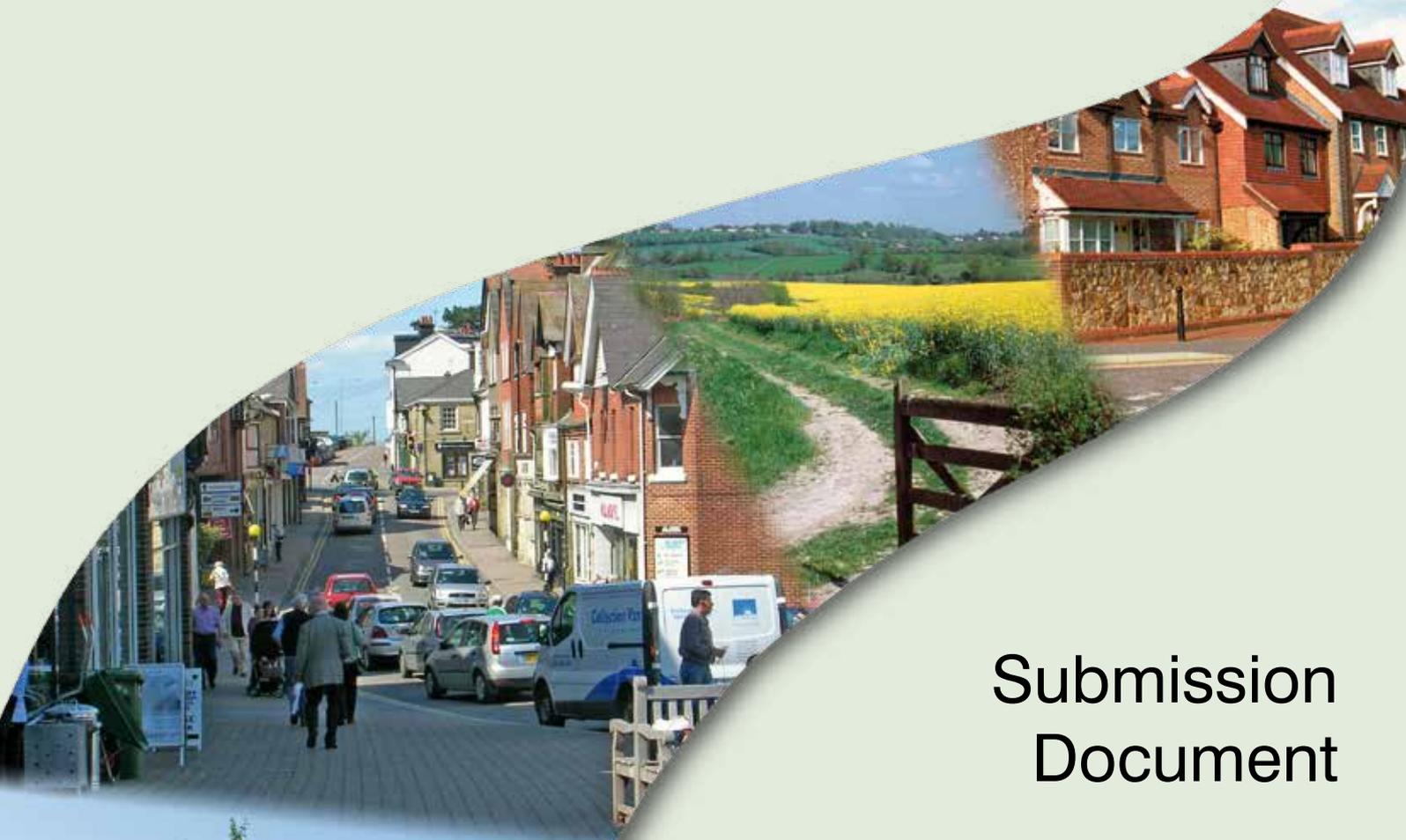
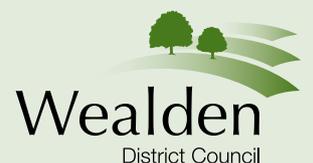


Wealden Local Plan

Development in the High Weald AONB Background Paper



Submission
Document



January 2019

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1 Introduction

1.1 This assessment has been undertaken in the context of preparing a new Wealden Local Plan for the Wealden District. Work on assessing the Objectively Assessed Needs (OAN) for housing and economic development, and development sites to meet those needs, has acknowledged that it is necessary to identify sites within the High Weald Area of Outstanding Natural Beauty (AONB) to ensure that the full development needs of the District can be met.

1.2 For context, the Wealden Local Plan identifies at least 14,228 (net) dwellings to come forward in the 15 year Plan period between 1 April 2013 and 31 March 2028 (Policy WLP 1 - Provision for Homes and Jobs), which is based on an Objectively Assessed Housing Needs (OAN) figure of 950 dwellings per annum (dpa) that is outlined in the Wealden District Housing Background Paper (January, 2019) and the Wealden Objectively Assessed Need (OAN) Update Draft Paper: 2013 to 2028 (March, 2017)⁽¹⁾. It should be noted that this housing target is substantially higher than that planned for within the Wealden District Core Strategy Local Plan (adopted February, 2013) that equated to 450 dwellings per annum under Policy WCS1 (Provision of Homes and Jobs 2006-2027).

1.3 Over 53% of the Wealden District is contained within the nationally designated landscape of the High Weald AONB. The National Planning Policy Framework (NPPF), inclusive of both the 2012 and 2018 versions, requires the conservation of landscape and scenic beauty within the AONBs. It is therefore a challenge to consider and deliver growth whilst at the same time ensuring that the natural environment is protected and conserved. The Government has now published a revised version of the NPPF (July, 2018), but for the remainder of this document, unless otherwise stated, the acronym NPPF will refer to the National Planning Policy Framework that was published in March 2012.

1.4 In this context, Wealden District contains a number of other national landscape and biodiversity designations that includes the Pevensey Levels Ramsar Site (3.71% of the District), two Special Areas of Conservation (SACs) that includes the Ashdown Forest SAC and Pevensey Levels SAC (6.97% of the District), the Ashdown Forest Special Protection Area (SPA) (3.83% of the District), various Sites of Special Scientific Interest (SSSI) (9.85% of the District), and the South Downs National Park (SDNP) (7.28% of the District) in the southern part of the District. It is anticipated that even in the event that the biodiversity designations cited above are wholly inclusive of each other (i.e. the SACs, SPAs, Ramsar Sites and SSSI overlap each other in full), then the amount of land designated/protected under national or international status amounts to approximately 70% of the Wealden District inclusive of the area located within the SDNP.

1.5 Given the amount of housing growth proposed within the Wealden Local Plan and the number of national/international landscape and biodiversity designations within Wealden District, this report will seek to address the issues surrounding housing development within the Wealden District and the inclusion of development allocations within the High Weald AONB.

1 [Wealden Objectively Assessed OAN Update Draft Paper: 2013 to 2028, \(March, 2017\)](#)

1.6 As discussed, the report addresses the scope of development allocations within the High Weald AONB, as part of the Wealden Local Plan. The main sections of the report are as follows:

- the legal and planning policy context for AONBs, that includes a description of the legislation underpinning AONBs, national and local planning policy relating to landscape, and the local evidence base supporting the Wealden Local Plan;
- the methodology underlying the AONB assessment; and
- the result findings for potential allocations considered within the Wealden Local Plan at Heathfield, Wadhurst and Mayfield.

1.7 It should be noted that regard has been given to the public consultation feedback received in response to the Wealden Local Plan. A summary report of this feedback is to be published separately alongside the new Wealden Local Plan.

2 Legal and Planning Policy Context

2.1 Area of Outstanding Natural Beauty (AONB)

2.1 Areas of Outstanding Natural Beauty (AONBs) are designated by the Government for the purpose of ensuring the protection and outstanding beauty of its landscape for people now and in the future, and for the wildlife that depends on its distinctive character. They were originally established under the National Parks and Access to the Countryside Act 1949, through the legislation that was reformulated in 2000 through the Countryside and Rights of Way Act (2000). There is a general duty on all relevant authorities to have regard to the purpose of conserving and enhancing the natural beauty of AONBs. In most cases, a large proportion of the land in an AONB is privately owned and the actions of all landowners, land managers and land users are critical to AONB Conservation.

2.2 This 'duty of regard' recognises that a wide range of bodies have a direct influence over the future of these protected landscapes. Wealden District Council and the High Weald Partnership have a statutory duty for managing the High Weald AONB. The High Weald Joint Advisory Committee (JAC) consists of a councillor from each of the 15 local authorities whose area is covered by the High Weald AONB designation, a representative from Natural England and five representatives co-opted from forum member organisations that represent community, recreation, nature conservation, farming and forestry interests. This group, alongside professional advisors, is responsible for the development of High Weald AONB Management Plans that is discussed further below.

2.3 The requirement to conserve and enhance the natural beauty of the AONB is also identified in the Countryside and Rights of Ways Act (2000) under section 92. This includes the conservation of its flora, fauna and geological physical features, as part of its natural beauty.

2.2 Countryside and Rights of Way Act (2000)

2.4 The Countryside and Rights of Way Act (2000), as amended⁽²⁾, provides the statutory requirements for the designation, management and general duties for public bodies dealing with AONBs. This includes sections 82 to 93 of the CRoW Act (2000).

2.5 Section 84 of the CRoW Act 2000 states that local planning authorities with all or part of their area within an AONB can take all such action as appears expedient to them for the accomplishment of the purpose of conserving and enhancing the natural beauty of the AONB, or so much of it as is included in their area.

2.6 This duty is particularly important to the delivery of the statutory purposes of protected areas. The duty applies to all local planning authorities. The duty is also relevant in considering development proposals that are situated outside the National Park or AONB boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.

2 [The Countryside and Rights of Way Act 2000](#)

2.7 Section 85 of the CRoW Act (2000) requires that in exercising or performing any functions in relation to, or so as to affect, land in an AONB, a relevant authority (this includes Wealden District Council) shall have regard to the purpose of conserving and enhancing the natural beauty of the AONB.

2.8 Section 89 and 90 of the CRoW Act (2000) outlines the responsibilities of local authorities, or in the case where AONBs cross administrative boundaries, conservation boards (in the High Weald AONBs case, this is the High Weald Joint Advisory Committee (JAC)) in terms of the preparation, production and publication of an Area of Outstanding Natural Beauty Management Plan. This section of the Act confirms that such a document shall be reviewed by the relevant local authority or conservation board within 5 years beginning with the date in which it was published and, after the first review, at intervals of not more than five years. The latest High Weald AONB Management Plan (2019-2024) is discussed further in the Background Paper below.

2.3 National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG)

The National Planning Policy Framework (NPPF) and Landscape

2.9 Paragraph 115 of the National Planning Policy Framework (March 2012) states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. It notes that the conservation of wildlife and cultural heritage are important considerations in all these areas (including the AONB), and should be given great weight in National Parks and the Broads.

2.10 Paragraph 116 of the NPPF then states that planning permission should be refused for 'major' development in these designated areas (including the AONB) other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. It notes that consideration of such applications should be tested against a set of criteria that is as follows:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

2.11 It should be noted that the revised NPPF (July, 2018) at paragraph 172 reiterates both the aforementioned paragraphs in their entirety, including the 'public interest' tests highlighted above. The revised NPPF paragraph does however add that both the scale and extent of development within these designated areas should be limited.

2.12 It is important to note that only 'major' development would need to satisfy this public interest test, which is why the definition of what constitutes 'major' development within an AONB is such a key element of planning and planning policy formulation in particular. It is also important to note that the NPPF does not take account of the cumulative impact of small developments which may be permitted within AONB's. They may not be classified as 'major' developments in isolation but together could have significant impacts akin to those that may occur with 'major' developments.

2.13 The NPPF does not provide a definition of 'major' development in this context. However, the revised NPPF (July, 2018) at footnote 55 states that for the purposes of paragraphs 172 and 173 (the latter paragraph relates to Heritage Coast), whether a proposal is 'major development' is a matter for the 'decision maker', taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. In most cases, the 'decision maker' would be the local planning authority or the Planning Inspectorate (PINs).

2.14 In addition to paragraphs 115 and 116, the NPPF (March, 2012) also covers other areas in relation to the countryside and landscape planning policy that should be taken into account in any policy conceived for development within AONBs. This includes the following paragraphs:

- *Paragraph 109* - confirms that the planning system should contribute to and enhance the natural local environment by protecting and enhancing valued landscapes, geological conservation interests and soils.
- *Paragraph 113* - that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. It notes that distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.
- *Paragraph 123* - that planning policies and decisions should aim to identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.
- *Paragraph 125* - that planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- *Paragraph 156* - states that local planning authorities should set out the strategic priorities for the area in the Local Plan and this should include strategic policies to deliver the conservation and enhancement of the natural and historic environment, including landscape.
- *Paragraph 157* - states that Local Plans should contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

2.15 It should be noted that the revised NPPF (July, 2018) has largely incorporated those paragraphs outlined above at paragraphs 170, 171 and 180 specifically.

Other Relevant Paragraphs in the NPPF

2.16 Firstly, paragraph 14 of the NPPF (March, 2012) relates to the presumption in favour of sustainable development and is viewed as the main starting point for plan-making (this is incorporated into the revised NPPF (July, 2018)) and states that in both cases, local planning authorities and their Local Plans should positively seek opportunities to meet the development needs of their area. It notes that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted⁽³⁾.

2.17 As noted in the introduction to this assessment, there are a number of other international and national environmental designations within Wealden District that, in combination with the High Weald AONB, can limit development and growth within the Wealden District.

2.18 Paragraph 118 of the NPPF relates to ecological designations and confirms that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm resulting from a development cannot be avoided (through locating on an alternative sites with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest; and
- the following wildlife sites should be given the same protection as European sites:
 - i. potential Special Protection Areas and possible Special Areas of Conservation;
 - ii. listed or proposed Ramsar sites; and
 - iii. sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

2.19 Paragraph 119 of the NPPF (paragraph 177 of the revised NPPF (July, 2018)) states that the presumption in favour of sustainable development does not apply where

³ For example, those policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.

development requiring appropriate assessments under the Habitats Regulations ⁽⁴⁾ because of its potential impact on a habitats site is being planned or determined.

2.20 In relation to supply of housing, paragraph 47 of the NPPF (March, 2012) confirms that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

2.21 Paragraph 49 of the NPPF (March, 2012) confirms that housing applications should be considered in the context of the presumption in favour of sustainable development and relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. Both paragraphs taken together confirm that Wealden District Council should meet as much of its objectively assessed housing needs through development allocations in its Local Plan, although this has to be consistent with the environmental policies set out in the Framework. The above paragraphs also confirm that Wealden District Council should aim to improve and then maintain high levels of housing growth to ensure that a five year housing land supply position is demonstrable.

National Planning Practice Guidance (PPG)

2.22 The PPG does not include specific policy requirements for AONBs, although it does provide guidance on the legislation and considerations that should be taken into account when formulating planning policies which may have an impact on AONB designated areas. The PPG notes that one of the core principles in the NPPF is that planning should recognise the intrinsic character and beauty of the countryside and that Local Plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside.

2.23 The PPG ⁽⁵⁾ confirms importantly that local planning authorities should have regard to management plans for National Parks and Areas of Outstanding Natural Beauty, as these documents underpin partnership working and the delivery of designation objectives. It notes that management plans highlight the value and special qualities of these designations to society and shows communities and partners how their activity contributes to protected landscape purposes.

2.24 The guidance notes also state that National Parks and Areas of Outstanding Natural Beauty Management Plans may not form part of statutory development plans, but may contribute to setting the strategic context for development by providing evidence and principles, which should be taken into account through the preparation of Local Plans.

4 See the [Conservation of Habitats and Species Regulations 2017](#)
5 [Paragraph: 004 Reference ID: 8-004-20140306](#)

2.25 With regards to 'major' development in an AONB, the PPG ⁽⁶⁾ does not contain a definition of 'major' development in this context but rather states that *'whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context'*. The guidance does reiterate, however, that great weight should be given to conserving landscape and scenic beauty in these designated areas irrespective of whether the policy in paragraph 116 is applicable.

2.4 The High Weald AONB and Management Plan

2.26 The High Weald AONB was designated as such in 1983 and covers an area of 1,461 km², making it the fourth largest AONB in England, Wales and Northern Ireland. The High Weald AONB covers 4 counties, 11 districts (including the Wealden District) and 11 parliamentary constituencies. In terms of land cover, the Wealden District accounts for 30.5% of the High Weald AONB (the largest proportion of any District) and this incorporates and/or surrounds a number of towns/villages in the District that includes Crowborough, Heathfield, Forest Row, Wadhurst and Mayfield. In terms of the proportion of the local authority within the High Weald AONB, this amounts to 53% of the District, which is the third highest proportion behind Tunbridge Wells (at 69%) and the Rother District (at 83%).

2.27 The Countryside and Rights of Way Act 2000 requires local authorities with land in an AONB to prepare and publish an up-to-date plan which formulates their policy for the management of the area and for the carrying out of their functions in relation to it. Where AONBs cross administrative boundaries, local authorities are required to act jointly to prepare the plan and for the High Weald AONB, this requirement is delivered through the High Weald Joint Advisory Committee (JAC). This partnership includes all 15 local authorities covering the area together with community, environment and land-based sector representatives. Following a formal consultation process, the High Weald JAC recommends the joint Plan to individual local authorities who each adopt the Plan. The Plan is reviewed every five years with the latest Plan, named the High Weald AONB Management Plan (2019-2024) ⁽⁷⁾, having been approved by the High Weald JAC recently and is expected to be adopted by Wealden District Council in the spring of 2019.

2.28 The High Weald AONB Management Plan (2019-2024) focuses on delivering the statutory purpose of AONB designation, which is conserving and enhancing the natural beauty of the AONB, a landscape that is of national significance. Consideration of wider environmental issues for the AONB, the rural economy and communities are dealt with in the context of delivering this purpose.

2.29 The High Weald AONB Management Plan (2019-2024) is tightly focused on the purpose of the AONB designation and the requirements of the Countryside and Rights of Way Act 2000. The Plan confirms that whilst it is aware of the wider realities - such as pressure for development - it does not attempt to balance the purposes of designation

⁶ [Paragraph: 005 Reference ID: 8-005-20140306](#)
⁷ [High Weald AONB Management Plan 2019-2024](#)

against non-AONB concerns. It notes that judging the merits of competing interests for land is the responsibility of Government, its agencies and planning authorities in conversation with others.

2.30 The High Weald AONB Management Plan (2019-2024) includes a Statement of Significance that defines the natural beauty of the High Weald; character statements that includes a list of key characteristics, describing the components of natural beauty that policy and actions should aim to conserve and enhance; a set of management policies ('Objectives') for the conservation and enhancement of the AONB together with a monitoring framework for judging success; and proposed actions which indicate the ambitions of partners for themselves, and for others, and which guide resources and effort to where they are most needed. The High Weald AONB Management Plan (2019-2024) has been considered through the development of the local planning policy on the High Weald AONB (Policy EA 5 - High Weald Area of Outstanding Natural Beauty) in the Wealden Local Plan. It is considered that the Management Plan provides such bodies with an objective, evidence-based tool articulating what matters in terms of AONB purpose and the fulfilment of their statutory duties.

2.31 The High Weald AONB Management Plan (2019-2024) contains a number of objectives that are directly relevant to considering new development or the protection of environmental assets. These objectives are also relevant to proposed development allocations within the Wealden Local Plan.

- Objective S1 - To reconnect settlements, residents and their supporting economic activity with the surrounding countryside.
- Objective S2 - To protect the historic pattern and character of settlement.
- Objective S3 - To enhance the architectural quality of the High Weald and ensure development reflects the character of the High Weald in its scale, layout and design.
- Objective W1 - To maintain the existing extent of woodland and particularly ancient woodland.
- Objective W3 - To protect the archaeology and historic assets of AONB woodlands.
- Objective W4 - To increase the output of sustainably produced high-quality timber and underwood for local markets.
- Objective FH4 - To protect the archaeology and historic assets of field and health.
- Objective LBE1 - To improve returns from, and thereby increase entry and retention in, farming, forestry, horticulture and other land management activities that conserve and enhance natural beauty.
- Objective LBE2 - To improve amenities, infrastructure (including the provision of appropriate affordable housing), and skills development for rural communities and related sectors that contribute positively to conserving and enhancing natural beauty.

2.5 Landscape Evidence Base and AONB Housing Needs Survey

Wealden District Council - Wealden Landscape & Settlement Character Assessment (November, 2014)

2.32 In 2014, Chris Blandford Associates carried out a Landscape and Settlement Character Assessment ⁽⁸⁾ on behalf of Wealden District Council that was published in November 2014. The main purpose of the study was to contribute to the Council's evidence base in terms of underpinning decisions on how best development should be accommodated within the District for the Plan period. The study was devised in order to assist the Council in identifying broad locations for accommodating development site allocations in the Delivery and Site Allocations Local Plan; this Plan was not taken forward so the evidence base has now been incorporated into the new Wealden Local Plan. In addition, this document was used to inform the development of policies on landscape management and protection in the new Wealden Local Plan.

2.33 The key objectives of this study are outlined in the introduction to the assessment and outlined below:

1. Assess the character, sensitivity and value of the District's landscapes outside of the High Weald Area of Outstanding Natural Beauty (AONB) and South Downs National Park.
2. Evaluate the capacity of the District's landscapes outside of the High Weald AONB and South Downs National Park to accommodate renewable energy development (solar farms and wind turbines).
3. Assess the character, sensitivity and value of landscapes around selected settlements within the District.
4. Evaluate the capacity of landscapes around the settlements identified in Policy WCS6 of the Wealden District Core Strategy Local Plan to accommodate residential and commercial development.
5. Evaluate the contribution of landscape settings around settlements with existing or potential Conservation Areas to the historic character of the settlements.

2.34 The assessment confirms that Wealden District is covered by four National Character Areas, which provide the context for the assessments undertaken by the study:

- The High Weald National Character Area extends across the northern part of the District.
- The Low Weald National Character Area extends through the middle part of the District.
- The Pevensey Levels National Character Area extends into the south-eastern part of the District.

2.35 The South Downs National Character Area also extends into the southern part of the District. The National Character Areas are defined by Natural England ⁽⁹⁾.

2.36 Section 4 of this document relates to the High Weald National Character Area, where the High Weald Area of Outstanding Natural Beauty (AONB) covers 78% of the National Character Area, reflecting the outstanding natural and scenic beauty of the landscape. The assessment of the character area includes:

⁸ [Wealden Landscape and Settlement Character Assessment \(2014\)](#)

⁹ [Natural England. National Character Areas - defining England's natural boundaries](#)

- A summary overview of the High Weald National Character Area and its constituent County Landscape Character Areas.
- Assessment of the character, sensitivity and value of each Local Landscape Character Type identified within the High Weald Landscape (excluding the AONB), including the description of each Type's constituent Local Landscape Areas, in accordance with the methodology set out in the document.
- Assessment of the Landscape Settings for each of the selected settlements within the High Weald Landscape/AONB in accordance with the methodology set out in the document.

2.37 In summary, the document provided the basis for landscape setting of each settlement within the Wealden District and included all the settlements located within the High Weald National Character Area (within Wealden District) and therefore the High Weald AONB. This document forms the basis for the Wealden Local Plan Sites Landscape and Ecological Assessment Study (July, 2017) that is described below.

Wealden District Council - Wealden Landscape & Settlement Character Assessment: Supplementary Report (November, 2016)

2.38 In November 2016, Wealden District Council commissioned Chris Blandford Associates to undertake a supplementary study to the Landscape and Settlement Character Study (2014) for Durgates and Sparrows Green in Wadhurst⁽¹⁰⁾. This assessment has been undertaken using the same approach as the Wealden Landscape and Settlement Character Assessment (November, 2014) that is described above, but only concerns those two neighbourhoods of Wadhurst. As a consequence, the document should be read in conjunction with the main report and specifically the adjacent settlement setting assessments for Cousley Wood (Section 4.10) and Wadhurst (Section 4.37) that is set out in the main report.

Wealden District Council - Wealden Local Plan Sites Landscape and Ecological Assessment Study (July, 2017)

2.39 In July 2017, Wealden District Council commissioned Chris Blandford Associates to undertake the Wealden Local Plan Sites Landscape and Ecological Assessment Study⁽¹¹⁾ and this details the ecological and landscape information to inform the process of identifying suitable sites for future development within those areas of the District outside of the South Wealden Growth Area (SWGA) but included within the draft Proposed Submission Wealden Local Plan (March, 2017). Those sites included within the South Wealden Growth Area (SWGA) have been considered separately under the South Wealden Growth Area Landscape and Ecological Assessment Study (April, 2017), but this study would not have included sites located within the High Weald AONB. The overall purpose of this background evidence document is to assist Wealden District Council in the selection of sites for residential development in and around settlements identified for growth in the new Wealden Local Plan, and to inform site specific policies. The evidence base document considered the landscape and ecological constraints/opportunities for residential

¹⁰ [Wealden Landscape & Settlement Character Assessment: Supplementary Report \(2016\)](#)

¹¹ [Wealden Local Plan Sites - Landscape and Ecological Assessment Study \(July, 2017\)](#)

development on 119 sites in and around 10 settlements that included the edge of Tunbridge Wells, Wadhurst, Ninfield, Herstmonceux, Heathfield, Mayfield, Stone Cross, Horam, Westham and East Hoathly.

2.40 The first part of the Wealden Local Plan Sites Landscape and Ecological Assessment Study (July, 2017) is the landscape assessment and the document provides the following information:

- Detailed Landscape Assessments of each site, including consideration of landscape and visual receptors, to inform the process of identifying suitable sites for allocations.
- Landscape Assessments which form a sound basis for the consideration of the landscape sensitivity and capacity for development of the Sites and their surroundings.
- Assists the Council in developing site-specific policies for each potential site.
- Assists the Council in developing future planning policies and principles which seek to protect, conserve and enhance the District's landscapes, both designated and non-designated.
- Sufficient information to assist in the determination of planning applications and decision making in relation to protecting and enhancing the District's landscape in accordance with the NPPF and associated guidance.

2.41 The assessment includes a desk-based assessment of each settlement/area and individual sites, a landscape and visual survey of sites and a landscape character and visual analysis based upon the desk-based assessments and visual surveys that have taken place. As noted below, those sites that have been allocated for development within the new Wealden Local Plan and are located within the High Weald AONB are based in and around the settlements of Wadhurst, Heathfield and Mayfield. It is noted that a number of sites included within the new Wealden Local Plan have been considered under Section 4.0 (Wadhurst), Section 7.0 (Heathfield) and Section 8.0 (Mayfield) of the Wealden Local Plan Sites - Landscape and Ecological Assessment Study (July, 2017), as well as the settlements themselves. This analysis has included a general assessment of the landscape constraints for individual settlements and sites, as well as a consideration of the impact upon the High Weald AONB where this applicable. The full landscape assessment methodology for the evidence base document can be found at Section 2.0 of the Wealden Local Plan Sites - Landscape and Ecological Assessment Study (July, 2017).

Housing Needs Survey Report - Wealden District: Settlements in Areas of Outstanding Natural Beauty (August, 2016)

2.42 In August 2016, Action in Rural Sussex, on the behalf of Wealden District Council published a Housing Needs Survey Report for settlements located within the Wealden District and the High Weald AONB that focused on affordable housing. The purpose of this study was to assess the scale and nature of the need for affordable housing in a number of parishes and settlements located within Wealden District that are covered, either wholly or partially, by the High Weald AONB. This included 10 Parishes that include Heathfield and Waldron, Mayfield and Five Ashes and Wadhurst and 16 settlements that included Heathfield, Mayfield and Wadhurst. The results of this survey are provided below.

2.43 A total of 5,432 housing need survey forms were distributed to households in the Parish of Heathfield and Waldron and it was considered from the responses provided (by 128 households) that the total number of households currently 'in need' of affordable housing based on an inability to afford a suitable market property was 65. It was considered out of the 65 households 'in need' of affordable housing, 45 households meet both the Wealden District Council eligibility criteria for the Housing Register and the local parish connection criteria. It was noted that majority of those 'in need' of affordable housing required either a 1 bed or 2 bed property (in total, 50 households). For the settlement of Heathfield itself (excluding the rest of the Parish), it was considered that the total number of households currently 'in need' of affordable housing based on an inability to afford a suitable market property was 50. It was considered out of the 50 households 'in need' of affordable housing, 38 households meet both the Wealden District Council eligibility criteria for the Housing Register and the local parish connection criteria.

2.44 A total of 1,721 housing need survey forms were distributed to households in the Parish of Mayfield and Five Ashes and it was considered from the responses provided (by 32 households) that the total number of households currently 'in need' of affordable housing based on an inability to afford a suitable market property was 16. It was considered out of the 16 households 'in need' of affordable housing, 11 households meet both the Wealden District Council eligibility criteria for the Housing Register and the local parish connection criteria. It was noted that almost all of those 'in need' of affordable housing required either a 1 bed or 2 bed property (in total, 15 households). For the settlement of Mayfield itself (excluding the rest of the Parish), it was considered that the total number of households currently 'in need' of affordable housing based on an inability to afford a suitable market property was 10. It was considered out of the 10 households 'in need' of affordable housing, 6 households meet both the Wealden District Council eligibility criteria for the Housing Register and the local parish connection criteria.

2.45 A total of 2,137 housing need survey forms were distributed to households in the Parish of Wadhurst and it was considered from the responses provided (by 50 households) that the total number of households currently 'in need' of affordable housing based on an inability to afford a suitable market property was 21. It was considered out of the 21 households 'in need' of affordable housing, 13 households meet both the Wealden District Council eligibility criteria for the Housing Register and the local parish connection criteria. It was noted that almost all of those 'in need' of affordable housing required either a 1 bed or 2 bed property (in total, 16 households). For the settlement of Wadhurst itself (excluding the rest of the Parish), it was considered that the total number of households currently 'in need' of affordable housing based on an inability to afford a suitable market property was 19. It was considered out of the 19 households 'in need' of affordable housing, 12 households meet both the Wealden District Council eligibility criteria for the Housing Register and the local parish connection criteria.

2.46 It should be noted that Policy HG 2 (Provision of Affordable Housing) of the Wealden Local Plan confirms that only those new housing sites that provide 6 dwellings (net) or more, if located within the High Weald AONB, would provide 35% of the total number dwellings as affordable and those sites below the threshold would not provide any affordable housing units. It is therefore of paramount importance that the settlements

located within the High Weald AONB can deliver housing developments above 6 dwellings (net) in order for affordable housing to be delivered to meet those in need of affordable housing in such settlements.

2.6 Wealden Local Plan

Wealden Local Plan - Context

2.47 The Wealden Local Plan (January, 2019) is a Development Plan Document (DPD)⁽¹²⁾ and covers the geographical area of the Wealden District, excluding the area which is contained within the South Downs National Park (SDNP). For the purposes of this document, the geographical extent of the Plan will be referred to as either the Wealden District or the District.

2.48 The Wealden Local Plan outlines the growth and change that will take place within Wealden District between 2013 and 2028 and provides both strategic and local planning policies for development and change. The Wealden Local Plan includes the South Wealden Growth Area (SWGA). This area includes all or part of the Parishes of Hailsham, Polegate, Hellingly and Westham and is identified to deliver the majority of growth and change within the District, including the majority of housing growth. The SWGA is located wholly outside the High Weald AONB.

2.49 The Wealden Local Plan includes a vision for the Wealden District and also contains a number of spatial objectives (fourteen in total) that outlines the objectives of the Wealden Local Plan up until 2028 that is end of the Plan period. The most relevant for the spatial objectives in terms of the protection of the High Weald AONB is Spatial Objective 7 - Natural Environment, that states that the Wealden District *'will help manage our countryside by protecting and enhancing sensitive and valued landscapes including the High Weald Area of Outstanding Natural Beauty and its setting and the setting of the South Downs National Park'*. It also states that Wealden District Council *'will seek to protect the dark night skies across the District and have regard to protecting the status of the South Downs National Park as an International Dark Sky Reserves'*. Spatial Objective 5 - Countryside also relates to the protection of rural areas, as well as the development of the rural economy and confirms that *'the rural character of a working countryside will be retained. The dispersed and small scale nature of housing and economic development within the countryside will be supported and protected with urbanisation kept to those towns and larger villages specified in the Plan'*.

2.50 Policy WLP 1 (Provision for Homes and Jobs) of the Wealden Local Plan (January, 2019) confirms, as discussed previously, that some 14,228 (net) dwellings will be delivered between 2013 and 2028. Provision is made for 4,012 dwellings on allocated land (some of these allocations are situated within the High Weald AONB) that includes 189 dwellings on Strategic Housing and Economic Land Availability Assessment (SHELAA) sites. The planning policy also confirms that land identified for the delivery of up to 22,500 net additional sq. metres of employment floorspace (Use Class B1, B2 and B8) over the Plan

¹² Under Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act (1990) applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

period between 2015 and 2028. Policy WLP 7 (Distribution of Homes) outlines the distribution of homes across the Wealden District, including a windfall allowance for each Middle Super Output Area (MSOA) across Wealden District. The broad distribution of land to be allocated for housing development to meet the requirements of Policy WLP1 is guided by the strategic objectives (e.g. such as transport modelling of new housing development and the associated impacts upon the Natura 2000 sites) and the settlement hierarchy.

2.51 Policy AF1 (Air Quality and Wealden Local Plan Growth) confirms that development identified in the Plan may only be delivered when suitable mitigation measures for the Ashdown Forest Special Area of Conservation and Lewes Downs Special Area of Conservation are identified and a delivery mechanism created by the local planning authority is in place, in accordance with Policy AF2 (Air Quality Mitigation). This planning policy confirms that development identified in this Plan that results in the net increase in traffic movements across roads adjacent to Ashdown Forest SAC or Lewes Downs SAC will be permitted subject to providing a financial contribution (through Section 106 contributions) a package of measures designed to ensure that there is no adverse impact on the integrity of Ashdown Forest SAC and Lewes Downs SAC. The planning policy identifies a number of measures that could be considered in this context.

2.52 Policy EA 2 (Ashdown Forest Special Protection Area) confirms that development will only be permitted if it can be concluded that there is no likely significant effect or that proposals will not adversely affect the integrity of the Ashdown Forest SPA in view of the site's conservation objectives. The planning policy also confirms proposals for a net increase in residential development or other accommodation will not be permitted within 400 metres from Ashdown Forest Special Protection Area (SPA), unless there are exceptional circumstances where it is demonstrated, through an appropriate assessment, that mitigation will be effective and as a result the competent authority can conclude that proposals will not adversely affect the integrity of Ashdown Forest SPA, either alone or in combination with other development and for the lifetime of that development. The planning policy also confirms that proposals for a net increase in residential development or other accommodation within 400 metres and 7 kilometres from the Ashdown Forest will be required to provide a financial contribution towards the provision / maintenance of the existing Strategic Suitable Alternative Natural Greenspaces (SANG) and the Strategic Access Management and Monitoring (SAMM) Strategy. Given the close proximity of the Ashdown Forest SPA to the settlements of Crowborough and Forest Row, the above constraints will have significant impacts in terms of the capacities of such settlements to bring forward to new housing development in these locations.

2.53 All of the above planning policies contained within the Wealden Local Plan (January, 2019) will have an impact upon the distribution of new homes within the Wealden District during the Plan period and therefore the landscape impacts, particularly in the AONB, only forms one, albeit significant, constraint on development.

Wealden Local Plan - Landscape Policies

2.54 There are three main planning policies contained within the Wealden Local Plan (January, 2019) that seek to protect the character of Wealden District landscapes. Policy

EA 4 (Wealden's Landscape Character) of the Wealden Local Plan (January, 2019) is the general planning policy on landscape character in the District and confirms that development will only be permitted where it protects, maintains, enhances, reinforces and complements the key characteristics of the landscape character area in which it is located or adjacent to, including:

- a. locally distinctive or sensitive natural and man-made landscapes, characteristics, components and functions including rural character, biodiversity, geodiversity, cultural and heritage quality and value and the district's distinctive settlement pattern;
- b. the sensitive of tranquillity, remoteness and sensitivity to change;
- c. the topography of the area;
- d. natural features such as trees, hedges, woodland, rivers, streams and other topographical features; and
- e. amenities of new and existing development.

2.55 The planning policy also confirms that landscape assessments will be required to demonstrate that valued landscape features and components will be protected and that any adverse landscape impacts can be mitigated. It notes that mitigation must be commensurate with the surrounding area and must seek to contribute to local distinctiveness.

2.56 As discussed above, the setting of the High Weald AONB is an important consideration in the Wealden Local Plan, as development and other activities may have an impact on the economic, social or ecological value of the landscape, as well as views into and out of the AONB. The towns of Heathfield and Crowborough are surrounded by the AONB, whilst other settlements, including larger villages of Forest Row, Wadhurst and Mayfield are incorporated within the AONB. The strategic distribution of growth detailed in the Wealden Local Plan (January, 2019) allocates land in Heathfield, Wadhurst and Mayfield. As noted below, the level of growth identified and the specific sites for which development is allocated have been assessed as suitable to accommodate growth taking into account the AONB designation and its purpose. Given the above, of particular importance for further growth is the recognition within the NPPF that the siting of major development in the High Weald AONB would be inconsistent with the aims of the designation, and that only proven national interest and a lack of alternative sites (i.e. paragraph 116 of the NPPF (March, 2012)) can justify an exception. It is therefore unlikely that further major development (i.e. over and above the sites allocated within the Wealden Local Plan) will be justified in the public interest.

2.57 Nevertheless, in the event that new development proposals do come forward outside of the Wealden Local Plan allocations within the High Weald AONB, Policy EA 5 (High Weald Area of Outstanding Natural Beauty) of the Wealden Local Plan (January, 2019) states the following:

'Development within or affecting the setting of the High Weald Area of Outstanding Natural Beauty (AONB), as defined on the proposals map, will only be permitted if it conserves and seeks to enhance natural beauty, having regard to the character of the landscape including potential impacts on its character components and its function as set out in the

High Weald AONB Management Plan. Development should also not detract from the visual qualities and essential characteristics including views into and out of the AONB in relation to its location, siting or design.

Such development should be small scale and should:

- *be in keeping with the landscape and settlement pattern;*
- *support the economy and/or the social well-being of the AONB;*
- *seek to conserve and/or enhance local distinctiveness and tranquillity; and*
- *seek to conserve wildlife and cultural heritage.*

2.58 This planning policy should be read in conjunction with the NPPF (March, 2012) and specifically the public interest tests that are outlined under paragraph 116 of the NPPF (or paragraph 172 of the revised NPPF (July, 2018)).

Wealden Local Plan - Housing Allocations within the High Weald AONB

2.59 As noted above, the Wealden Local Plan (January, 2019) allocates land for housing development within the High Weald AONB at Heathfield, Wadhurst and Mayfield. This includes the following allocations as described in Table One below:

Table 1 : Sites Allocated in the Wealden Local Plan and within the High Weald AONB

Site Allocations	Policies Reference for WLP	Number of Dwellings (net)
Land South of Burwash Road, Heathfield	Policy RUGA 1 - Land South of Burwash Road	30
Land South West of Ghyll Road, Heathfield	Policy RUGA 2 - Land South West of Ghyll Road	103
Land at Windmill House, Wadhurst	Policy RUGA 5 - Allocation Land at Windmill House	20
Land at High Street, Wadhurst	Policy RUGA 6 - Allocation Land at High Street	10
Land East of Old Station Road, Wadhurst	Policy RUGA 7 - Allocation Land East of Old Station	21
Land at Foxhole Farm, Wadhurst	Policy RUGA 8 - Allocation Land at Foxhole Farm	40
Land at Mayfield Cricket Club, Mayfield	Policy RUGA 17 - Allocation Land at Mayfield Cricket Club	50

Total Number of Dwellings Allocated within the Wealden Local Plan that are located in the High Weald AONB	274
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2.60 As noted under Policy WLP 1 (Provision of Homes and Jobs) of the Wealden Local Plan (January, 2019), the Plan seeks to provide 14,228 (net) dwellings over the Plan period (2013 - 2028), with 4,012 (net) dwellings coming forward through specific site allocations or identified SHELAA sites that are considered appropriate with regards to the planning policies contained within the Wealden Local Plan. Consequently, those allocated sites within the High Weald AONB only account for 6.8% of the total amount of dwellings coming forward as allocations within the Wealden Local Plan, or 1.9% of the total amount dwellings accounted for in Policy WLP 1. The allocations within the High Weald AONB are to ensure that settlements within or wholly surrounded by the High Weald AONB can meet their own needs, where this is environmentally acceptable. This is considered further in the sections below.

3 Methodology

Overview of Methodology

3.1 This High Weald Area of Outstanding Natural Beauty (AONB) Background Paper assesses the suitability of potential Wealden Local Plan allocations in the High Weald AONB, with a particular focus on issues affecting the AONB. It should be noted that at this stage, the Sustainability Appraisal Report that accompanies the Wealden Local Plan has considered all potential allocation sites across the Wealden District, including those sites that have been put forward within the High Weald AONB. This comprises four stages that are as follows:

- Stage 1 - Identifying broad locations generally capable of contributing to sustainable development, relative to the settlement hierarchy contained within the Wealden Local Plan.
- Stage 2 - An initial suitability assessment of sites in the above locations.
- Stage 3 - An specialist landscape assessment for potential allocation sites.
- Stage 4 - An assessment of whether the allocation site meets the criteria under paragraph 116 of the NPPF (March, 2012) or paragraph 172 of the revised NPPF (July, 2018)

3.2 Whilst these stages are generally progressive and sequential, there was also an element of iteration over time. The presumption is that sites which pass all four stages should be recommended for allocation in the Wealden Local Plan, subject to the findings of the SHELAA (January, 2019) that supports the Wealden Local Plan and the Sustainability Appraisal that accompanies the Wealden Local Plan. The Sustainability Appraisal Report considers a number of other factors, as outlined in Section 2, that could impact whether a site should be allocated within the Wealden Local Plan.

Stage 1 - Identifying broad locations capable of contributing to sustainable development

3.3 The first step to identifying possible sites in the AONB was to consider the Settlement Hierarchy and the emergent spatial strategy that the Wealden Local Plan considered appropriate. As part of the evidence for the Wealden Local Plan, the Council has outlined a 'Settlement Hierarchy' under section 3 based on the facilities and accessibility currently in existence, which defines the sustainability of the location⁽¹³⁾. There are five categories of settlements that are considered 'sustainable settlements' where housing growth is considered acceptable⁽¹⁴⁾, which includes the edge of Tunbridge Wells in the Wealden District, towns (that includes Hailsham, Uckfield, Crowborough and Heathfield), urban settlements (that includes Polegate and Willingdon and Stone Cross), Large Villages - Type 1 (that includes Forest Row and Wadhurst) and Large Village - Type 2 (that includes Mayfield, amongst other villages). Any other settlement not contained within these

13 This is considered in more detail within the Settlement Hierarchy Background Paper (January, 2019) that accompanies the Wealden Local Plan.

14 It should be noted that limited, small scale development may be acceptable in 'unsustainable settlements' subject to other planning policies contained within the development plan and specifically policies WLP5 (Core Areas), WLP7 (Distribution of Homes), AF1 (Air Quality and Wealden Local Plan Growth), AF2 (Air Quality Mitigation) and RAS 1 (Core Areas).

categories are considered 'unsustainable settlements' and would therefore only be supported for windfall development subject to other policies contained within the Wealden Local Plan. For the purposes of this assessment, no development allocations were considered acceptable within the 'unsustainable settlement' categories as identified within the Wealden Local Plan.

Stage 2 - Initial Suitability Assessment

3.4 A Strategic Housing and Economic Land Availability Assessment (SHELAA) was published in August 2018, alongside the Proposed Submission Wealden Local Plan (August, 2018) and gives an high level assessment of all sites put forward to the local planning authority for both housing and economic development. Paragraph 159 of the NPPF (March, 2012) requires local planning authorities to prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land within their area. This is to enable local planning authorities to maintain an adequate supply of housing land to meet their identified local housing needs. As part of this process, local planning authorities must assess all potential opportunities for development to help identify which sites or locations are most suitable or deliverable for a particular use.

3.5 The housing and economic land availability assessment Planning Practice Guidance (PPG), last updated 13 September 2018, states that as a minimum a SHELAA assessment should:

- identify sites and broad locations with potential development;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

3.6 The PPG ⁽¹⁵⁾ confirms that the following factors should be considered to assess a site's suitability for development now or in the future:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;*
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas; and
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

3.7 As noted within Wealden District Council's SHELAA (August, 2018) the methodology is based upon the latest PPG and would therefore consider all the issues above (amongst others) on a high level basis. As noted in Wealden District Council's SHELAA (August, 2018) under paragraph 6.7, those potential development sites located within SSSIs, SPAs, SACs, Ramsar Sites, scheduled ancient monuments and historic parks and gardens are

15 See [Paragraph: 019 Reference ID: 3-019-20140306](#)

considered to be 'excluded sites' that represent areas which are protected for international, national, regional and local environmental, nature conservation or historical reasons. Paragraph 6.8 of the SHELAA (August, 2018) confirms that there are other significant designations noted in the site assessments including flood risk areas, Local Wildlife Sites (LWS), Areas of Outstanding Natural Beauty (AONB) and areas of Ancient Woodland. It notes that development in these locations is not preferable, but it may, in some circumstances, be possible to appropriately mitigate adverse impacts through development design. Therefore, sites containing small areas of these designations may still be considered suitable, particularly given other options in those locations. These designations have been noted as a potential constraint and this means the viability of certain sites could be impacted due to the additional remediation/site preparation costs needed to mitigate such impacts. In this context, the SHELAA does consider landscape sensitivity and the AONB impacts at a high level, in addition to other physical/planning limitations and constraints.

Stage 3 - Landscape Assessment

3.8 A summary of the various landscape assessments undertaken by Chris Blandford Associates on behalf of Wealden District Council is provided in section 2.0 of this document. The Wealden Local Plan Sites Landscape and Ecological Assessment Study (July, 2017) ⁽¹⁶⁾ full methodology is outlined at Section 2.0 and the assessment process comprising the following stages, is described below:

- *Landscape Baseline* - comprising a desk-based assessment informed by previous studies, aerial photographs and OS maps; a site survey of each site and its wider landscape context; and an analysis of the landscape character and visual characteristics of a site and its context.
- *Landscape Sensitivity and Capacity* - evaluation of the site's sensitivity and capacity for accommodating development.
- *Outline Landscape Mitigation* - identification of key landscape constraints (qualities/features to be safeguarded) and potential landscape enhancement opportunities for development.

3.9 Sites which demonstrate a low landscape capacity for development would not normally be appropriate for allocation through the Local Plan process. The allocation of sites with a medium/low to high capacity may have some adverse impacts upon the integrity of the AONB, but subject to the detailed design stage (i.e. the planning application process) it should normally be possible to mitigate any impacts to an acceptable degree through the careful design of the proposals that take account of the identified sensitivities of the sites. As discussed above, landscape mitigation and the identification of key landscape constraints (qualities/features to be safeguarded) is considered within the report and has been incorporated within the relevant Wealden Local Plan allocation policies, where the site is situated within the High Weald AONB.

Stage 4 - Major Development Classification and the AONB 'Public Interest' test outlined in the NPPF (March, 2012 and July, 2018)

16 [The Wealden Local Plan Sites Landscape and Ecological Assessment Study \(July, 2017\)](#)

3.10 As discussed under section 2.0 of this paper, the term 'major development' in the context of paragraph 116 of the NPPF (March 2012) or paragraph 172 of the revised NPPF (July, 2018) has not been fully defined by national planning policy or legislation. However, the PPG confirms that whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context. There are a number of factors to consider in identifying whether a proposed allocation is likely to result in 'major development' in the AONB and these are as follows:

- the scale of the allocation in proportion to the existing settlement;
- the spatial relationship of the allocation to the existing settlement in the context of settlement form;
- the potential for a serious adverse impact on the AONB, in terms of landscape impact; the impact upon the tranquillity/enjoyment of the AONB; the wildlife/habitat impact and/or the heritage impact; and
- whether the proposed allocation can be described as 'major' in the normal meaning of the word.

3.11 It should be noted that any one of these questions could potentially trigger a classification as 'major development' in the AONB, but equally a single question, such as whether the proposed allocation can be described as 'major' in the normal meaning of the word, can suggest (if the answer is no) that the proposed allocation cannot be described as 'major development'. As described in the PPG, the classification of 'major development' in the context of AONBs is dependent on the scale of the proposal and its location. This is summarised for each site allocation below. In addition, each of the sites allocated within the Wealden Local Plan has been considered against the public interest tests outlined in the NPPF (March, 2012) under paragraph 116 that are also outlined under paragraph 172 of the revised NPPF (July, 2018), irrespective of whether the local planning authority classifies the site as 'major' development in the context of the High Weald AONB. The results of this assessment are below. It should be noted that all potential development sites have been considered within the Sustainability Appraisal that accompanies the Wealden Local Plan (January, 2019), and moreover, the SHELAA that was published in August, 2018.

4 Wealden Local Plan - Site Allocations within the High Weald AONB and Options for those Settlements

4.1 Heathfield - Allocated Sites

Policy RUGA 1 - Land South of Burwash Road

4.1 Located on the north-eastern edge of Heathfield, this site is allocated for development of up to 30 dwellings provided it meets the site specific requirements outlined in policy RUGA 1 in the new Wealden Local Plan. The surrounding residential area provides low density housing at around 15 dwellings per hectare and therefore in order to maximise the use of land in a sustainable location and within the High Weald AONB, the policy considers that 30 dwellings per hectare should be achieved overall. The site comprises of two sites in separate ownership totalling around 1.9 hectares and is defined on the Proposals Map as HEA1. The site includes two residential properties with associated gardens and grazing land (SHELAA site references 299/1210 and 275/1210). With land sloping to the south, it is considered to be one of the better development opportunities in Heathfield due to its visual containment, with residential development to the west and Ancient Woodland to the south. The site is immediately adjacent to Heathfield Park (registered Historic Park and Garden and a designated SSSI), as well as being adjacent to Ancient Woodland to the south. The site is wholly contained within the High Weald AONB.

4.2 In terms of policy RUGA 1, criteria e) confirms that the layout and design of the development shall have regard to its location within the High Weald Area of Outstanding Natural Beauty and shall be determined through a landscape and visual impact assessment taking into account the setting of the High Weald AONB. It notes that the design will require the sensitive layout of spaces, the provision of soft landscaping, the use of local materials and a consideration of the character of the area.

Major Development Classification

4.3 Within the 'settlement hierarchy' that is contained within the Wealden Local Plan, the town of Heathfield is categorised as a 'town', which is described as a district centre for purposes of retail, employment and leisure with good local facilities to meet the day to day needs of residents. These settlements have a wide draw of visitors from the rural hinterland to use services, and are considered to be one of the most sustainable settlements within Wealden District. As of the 2011 Census, the Parish of Heathfield and Waldron had 4,996 households and this likely to be higher given the time elapsed between the Census and present. It is also noted that the smaller villages of Waldron, Cross-in-Hand, Broad Oak and Punnetts Town are located in the Parish, but it still anticipated that the majority of households are located in the town of Heathfield itself. In any case, the allocation of Land South of Burwash Road equates to 30 (net) dwellings and would represent a minor increase to households in the Parish (the allocation equates to 0.6% of total households in the Parish).

4.4 In terms of the spatial relationship between the allocation and the existing settlement, the site is enclosed by residential development to the west, the north (when developed)⁽¹⁷⁾ and Ancient Woodland to the south. The allocation is considered to be a logical extension of the settlement and relatively well contained, given the presence of Heathfield Park, the existing and committed residential development to the west and north respectively and the Ancient Woodland to the south. Despite the edge of settlement location, it is considered that the development would still potentially erode the landscape character of a fringe part of Heathfield, albeit that the allocation is visually well contained as described above and has been partially eroded by the planning permission granted to the north of the allocation for 20 (net) dwellings.

4.5 The SHELAA site references for the allocation (299/1210 and 275/1210) have been considered through the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and has been described as having moderate visibility, high landscape sensitivity and value, and low landscape capacity. It is noted that its location is not far from the existing urban edge of the settlement and the busy road gives a slightly more limited sense of remoteness/tranquillity and reduces the Site's landscape value, but balanced against this is its location within the High Weald AONB and its contribution to the setting of the Registered Park and Garden to the south, giving the site a high landscape value overall. In terms of the extent to which these landscape impacts could be moderated, the evidence base describes that any new development should maintain a buffer to Ancient Woodland, protect existing mature trees and respect the setting and significance of the listed building named the Old Half Moon, adjacent to the eastern boundary of the site. These issues are considered under criteria b, c and f of Policy RUGA 1 (Land South of Burwash Road) of the Wealden Local Plan.

4.6 It is considered that a proposal of this scale (i.e. no more than 30 dwellings) in the context of Heathfield would not normally be described as major development. In conclusion, it is considered that the scale of the proposed allocation in the context of Heathfield would be modest, given its edge of settlement location and limited scale. Despite the edge of settlement location, it is considered that the development would still potentially erode the landscape character of a fringe part of Heathfield as summarised above, albeit that the allocation is visually well contained in the context of existing and committed residential development. It is considered that Policy RUGA 1 of the Wealden Local Plan would mitigate those issues evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and as such, the proposed allocation would not likely result in major development within the High Weald AONB. On a precautionary basis, an assessment against the public interest tests set out in the NPPF (March, 2012) and revised NPPF (July, 2018) are set out below.

NPPF - Public Interest Test	Justification
a) the need for development, including in	A sufficient supply of housing land is needed on both a district wide and local level to meet the housing requirements set out within Policy WLP 1 (Provision of Homes

17 The site is named Parklands and has been granted planning permission for 20 (net) dwellings under planning reference WD/2017/2729/MEA.

NPPF - Public Interest Test	Justification
<p>terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.</p>	<p>and Jobs) of the Wealden Local Plan and affordable housing particularly, where it known that at least 50 households were 'in need' of affordable housing within the Heathfield settlement (see the Housing Needs Survey Report - Wealden District: Settlements in Areas of Outstanding Natural Beauty August, 2016). Heathfield has been described in the Wealden Local Plan 'settlement hierarchy' as one of the most sustainable settlements in the District (alongside Hailsham, Crowborough and Uckfield) and is therefore expected to meet its own housing needs where it is appropriate to do so in the context of the environmental constraints of the site, including its landscape impact on the High Weald AONB. The impact of not allocating land for housing development within/adjoining Heathfield would be significant, as both retail and employment land would rely upon household growth within/adjoining the town. All sites across the district have been assessed as part of the SHELAA and Sustainability Appraisal that accompanies the Wealden Local Plan. The Sustainability Appraisal also considers the relative merits of settlements, particularly taking into account the relative impact upon environmental designations which includes, but is not limited to, the relative impacts of settlements in relation to Ashdown Forest SAC. In this regard, there are benefits to developing in this area compared to other settlements within the District.</p>
<p>b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way.</p>	<p>The High Weald AONB designation surrounds Heathfield to all sides and extends a further 2.5km to the south of the settlement before it ends. As a result, no development can be located outside of the designated area, and still relate to Heathfield, with the exception of development within the settlement boundary. If development was located at the nearest sustainable settlement outside of the High Weald AONB (i.e. Horam), this would deliver housing development that would benefit Horam and the wider District, but not relate specifically to meeting the housing needs of Heathfield. In addition, whilst it is preferable to accommodate new housing development on Previously Developed Land (PDL) within the development boundary of Heathfield, it is not considered possible to deliver the housing needs of the town solely through the use of PDL in Heathfield. In addition, policy WLP 7 (Distribution of Homes) of the Wealden Local Plan confirms that a windfall allowance will be supported within the Heathfield development boundary that will reduce additional opportunities to deliver new housing within the development boundary of Heathfield.</p>
<p>c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</p>	<p>The SHELAA site references for the allocation (299/1210 and 275/1210) have been considered through the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and has been described as having moderate visibility, high landscape sensitivity and value, and low landscape capacity. Its location is not far from the existing urban edge of the settlement and the busy road gives a more limited sense of remoteness/tranquillity and reduces the site's landscape value, but balanced against this is its location within the High Weald AONB and its contribution to the setting of the Registered Park and Garden to the south, giving the site a high landscape value overall. The impacts of the allocation upon the High Weald AONB includes Ancient Woodland on the southern boundary of the site and the impact upon the setting of Heathfield Park (a registered Historic Park and Garden) and listed building (the Old Half Moon), the latter of which adjoins the eastern boundary of the site. These issues are considered under criteria b, c and f of Policy RUGA 1 (Land South of Burwash Road) of the Wealden Local Plan and will be moderated through the planning application process.</p>

Policy RUGA 2 - Land South West of Ghyll Road

4.7 The proposed allocation is located on the south western edge of Heathfield and is allocated for development of up to 103 dwellings, provided it meets the site specific requirements outlined in Policy RUGA 2 of the new Wealden Local Plan. This allocation comprises three adjoining land parcels within three separate ownerships. The site area totals around 4.4 hectares and consists of three grassland fields scattered with trees and scrub and bordered by mature hedgerows. The site is located directly to the south and west of the residential built up area of Heathfield with good accessibility to the town centre, local services including bus services and the Cuckoo Trail National Route. The site comprises SHELAA Site 149/1210 and is defined on the Proposals Map as HEA2. The site is located within the High Weald AONB and is visually well contained, although distant long range views towards the South Downs can be achieved in certain locations within the site. The design of development will need to account for the features that will assist in meeting targets in the High Weald AONB Management Plan including hedgerows and the retention of semi-improved neutral grassland and mature trees.

4.8 In terms of the policy RUGA 1, criteria h) confirms that the layout and design of the development shall have regard to its location within the High Weald Area of Outstanding Natural Beauty and shall be determined through a landscape and visual impact assessment taking into account the setting of the High Weald AONB. It notes that the design will require the sensitive layout of spaces, the provision of soft landscaping, the use of local materials and a consideration of the character of the area.

Major Development Classification

4.9 Within the 'settlement hierarchy' that is contained within the Wealden Local Plan, the town of Heathfield is categorised as a 'town', which is described as a district centre for purposes of retail, employment and leisure with good local facilities to meet the day to day needs of residents. These settlements have a wide draw of visitors from the rural hinterland to use services and are considered to be one of the most sustainable settlements within the Wealden District. As of the 2011 Census, the Parish of Heathfield and Waldron had 4,996 households and this likely to be higher given the time elapsed between the Census and present. In any case, the allocation of Land South West of Ghyll Road equates to 103 (net) dwellings and would represent a moderate increase to households in the Parish (the allocation equates to 2.06% of total households in the Parish).

4.10 In terms of the spatial relationship between the allocation and the existing settlement, the allocation is located to the south west of Ghyll Road and is within walking distance of the town's main facilities. The site is visually well contained, with substantial residential development to the east and north of the site, with more sporadic development to the south and west. However, it was considered within the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that the site has a strong sense of tranquillity; and that the southern part does not feel connected to the settlement of Heathfield. It should be noted that this part of the development allocation is sought to be retained through Policy RUGA 2 (Land South West of Ghyll Road) as a semi-improved neutral grassland.

4.11 The SHELAA site reference for the allocation (149/1210) have been considered through the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and has been described as having moderate visibility, high landscape sensitivity and very high landscape value, and therefore low landscape capacity. It notes that its location within the High Weald AONB and the coherent ancient landscape pattern, gives the site a very high landscape value. However, there are significant variations in landscape sensitivity within the site. It is considered that northern most field adjacent to the road is least sensitive as a result of its land use (improved grassland) and proximity to the ridgeline. The southern-most field is semi-improved neutral grassland, which is described as a key yet increasingly rare feature of the High Weald AONB. In terms of the extent to which these landscape impacts could be moderated, the evidence base describes that any new development should retain the semi-improved neutral grassland, which would help to meet targets in the High Weald AONB Management Plan, protect existing mature trees and to retain the field boundaries within and around the site, as these features will also help to visually contain the site. These issues are addressed under criteria d, e and h of Policy RUGA 2 (Land South West of Ghyll Road) of the Wealden Local Plan.

4.12 It is considered that a proposal of this scale (i.e. no more than 103 dwellings) in the context of Heathfield could normally be described as major development. In conclusion, it is considered that the scale of the proposed allocation in the context of Heathfield would be moderate. Despite the edge of settlement location, it is considered that the development would still potentially erode the landscape character of a fringe part of Heathfield as summarised above, albeit that the allocation is visually well contained in the context of existing and committed residential development. It is considered that Policy RUGA 1 of the Wealden Local Plan would mitigate those issues evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and as such, the proposed allocation would not likely result in a significant detrimental impact on the High Weald AONB. An assessment against the public interest test criteria set out in the NPPF (March, 2012) and revised NPPF (July, 2018) is set out below.

NPPF - Public Interest Test	Justification
<p>a) the need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.</p>	<p>A sufficient supply of housing land is needed on both a district wide and local level to meet the housing requirements set out within Policy WLP 1 (Provision of Homes and Jobs) of the Wealden Local Plan and affordable housing particularly, where it known that at least 50 households were 'in need' of affordable housing within the Heathfield settlement (see the Housing Needs Survey Report - Wealden District: Settlements in Areas of Outstanding Natural Beauty August, 2016). Heathfield is described in the Wealden Local Plan 'settlement hierarchy' as one of the most sustainable settlements in the District (alongside Hailsham, Crowborough and Uckfield) and is therefore expected to meet its own housing needs where it is appropriate to do so in the context of the environmental constraints of the site, including its landscape impact. The impact of not allocating land for housing development within/adjoining Heathfield would be significant, as both retail and employment land would rely upon household growth within/adjoining the town. All sites across the district have been assessed as part of the SHELAA and Sustainability Appraisal that accompanies the Wealden Local Plan. The Sustainability Appraisal also considers the relative merits of settlements, particularly taking into account the relative impact upon environmental designations which includes, but is not limited to, the relative</p>

NPPF - Public Interest Test	Justification
	impacts of settlements in relation to Ashdown Forest SAC. In this regard, there are benefits to developing in this area compared to other settlements within the District.
b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way.	The High Weald AONB designation surrounds Heathfield to all sides and extends a further 2.5km to the south of the settlement before it ends. As a result, no development can be located outside of the designated area, and still relate to Heathfield, with the exception of development within the settlement boundary. If development was located at the nearest sustainable settlement outside of the High Weald AONB (i.e. Horam), this would deliver housing development that would benefit Horam and the wider District, but not relate specifically to meeting the housing needs of Heathfield. In addition, whilst it is preferable to accommodate new housing development on Previously Developed Land (PDL) within the development boundary of Heathfield, it is not considered possible to deliver the housing needs of the town solely through the use of PDL in Heathfield. In addition, policy WLP 7 (Distribution of Homes) of the Wealden Local Plan confirms that a windfall allowance will be supported within the Heathfield development boundary that will reduce additional opportunities to deliver new housing within the development boundary of Heathfield.
c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	The site is considered to be visually, relatively well contained with varying landscape sensitivities across the site. The northern-most field adjacent to the road is least sensitive due to its close proximity to the settlement, whereas the southern-most field is semi-improved neutral grassland, which is considered a key feature of the High Weald AONB. Policy RUGA 2 (Land South West of Ghyll Road) requires any development to protect, retain and manage at least 0.422 hectares of semi-improved grassland, as well as enhancing the hedgerows and mature trees along the site boundaries to create an appropriate landscape buffer to the site. These issues are addressed under criteria d, e and h of Policy RUGA 2 (Land South West of Ghyll Road) of the Wealden Local Plan.

4.2 Heathfield - Alternative Sites

4.13 The Wealden District Council Strategic Housing and Economic Land Availability (SHELAA) was published in August 2018 and is an evidence base document used to support the development of planning policy documents including the Wealden Local Plan and to help inform emerging Neighbourhood Development Plans (NDPs). The aim of the SHELAA is to provide an assessment of potential housing and economic land to enable the Council to identify a sufficient supply of deliverable sites or broad locations. The SHELAA is effectively an assessment of land availability that seeks to identify a future supply of land, which is suitable, available and achievable for housing and economic development uses. The majority of the sites assessed within the SHELAA have been put forward to the Council by land agents, landowners and/or housing developers.

4.14 As noted within Wealden District Council's SHELAA (August, 2018) the methodology is based upon the latest Planning Practice Guidance and would therefore consider all planning designations (including national and local planning policy where applicable), physical constraints and environmental issues on a high level basis. As noted in Wealden District Council's SHELAA (August, 2018) under paragraph 6.7, those potential development sites located within SSSIs, SPAs, SACs, Ramsar Sites, scheduled ancient monuments and historic parks and gardens are considered to be 'excluded sites' that represent areas which are protected for international, national, regional and local environmental, nature conservation or historical reasons. Paragraph 6.8 of the SHELAA (August, 2018) confirms that there are other significant designations noted in the site assessments including flood risk areas, Local Wildlife Sites (LWS), Areas of Outstanding Natural Beauty (AONB) and areas of Ancient Woodland. It notes that development in these locations is not preferable, but it may, in some circumstances, be possible to appropriately mitigate adverse impacts through development design. Therefore, sites containing small areas of these designations may still be considered suitable, particularly given other options in those locations. As such designations have been noted as a potential constraint, this means the viability of certain sites could be impacted due to the additional remediation/site preparation costs needed to mitigate such impacts. In this context, the SHELAA does consider landscape sensitivity and the AONB impacts in a 'high level' fashion, in addition to other physical/planning limitations and constraints.

4.15 The published SHELAA (August, 2018) does consider all the development sites put forward and considered for the Wealden Local Plan process and therefore considers all the potential development sites within or outside the settlements of Heathfield, Wadhurst and Mayfield that have allocations within the High Weald AONB. In addition, all such development sites have been considered within the accompanying Sustainability Appraisal Report (SA) for the new Wealden Local Plan under SA Objective 2⁽¹⁸⁾ the potential landscape impacts of development upon the High Weald AONB (which in almost all cases would lead to a negative effect). Lastly, both the Wealden Landscape & Settlement Character Assessment (November, 2014) and Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) have either considered the areas in which the alternative sites are located from a landscape point of view, or in the case of the latter evidence base document, the individual SHELAA sites themselves, which includes their

18 To conserve and enhance the District's countryside, landscape, historic environments, and cultural assets.

visibility, landscape sensitivity, landscape value and importantly, landscape capacity. These issues are summarised in the table below for the alternative SHELAA sites adjacent or close to the settlement boundary of Heathfield.

4.16 As discussed within the SHELAA (August, 2018), there are a number of sites promoted for the SHELAA that are considered too small for the assessment and the SHELAA will only seek to include those housing sites that are either over 0.25 hectares or are capable of accommodating 5 or more dwellings. For reference purposes, the sites that have been considered too small for assessment within the SHELAA (August, 2018) have been accounted for in the table below and have been concluded as 'site considered too small for assessment'. It should be noted that this does not preclude those sites from development in line with Policy WLP 7 (Distribution of Homes) under the windfall allowance, but due to their size, such sites will not be allocated within the Wealden Local Plan. Furthermore, a number of SHELAA sites have been granted planning permission by the local planning authority at the time of the assessment but have yet to be built out. Such sites have not been assessed further (although the sites have been identified below) and are considered to be commitments in the context of the Wealden Local Plan. Lastly, it should be noted that only those SHELAA sites that relate to the settlement of Heathfield have been considered in the context of new allocations within the Wealden Local Plan. Other smaller settlements within the Parish of Heathfield and Waldron have been considered within the settlement hierarchy in the Wealden Local Plan, but are considered to be 'unsustainable settlements' not capable of accommodating significant allocations for development⁽¹⁹⁾.

4.17 Following the issues outlined above, the table below presents all the alternative development sites that have been considered within the SHELAA (August, 2018) for the settlement of Heathfield. This includes the SHELAA references and site addresses, a summary of the SHELAA in the context of the AONB for individual sites, a summary of the issues presented by the either Wealden Landscape and Settlement Character Assessment (November, 2014) or specifically through the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017), a summary of whether the site is considered to be 'major development' in the context of the paragraph 116 of the NPPF and an overall recommendation. As discussed above, the alternative SHELAA sites below are associated with the settlement of Heathfield only.

19 Both Cross-in-Hand and Maynards Green are categorised as 'local settlements' that are defined as settlements with accessibility by public transport but with local to very limited facilities. Broad Oak, Old Heathfield and Punnetts Town are categorised as 'neighbourhood settlements' that are defined as settlements with no accessibility but with some facilities. All such settlements are considered as 'unsustainable settlements' that may be capable of residential development in line with policies on 'Core Areas' contained within the Wealden Local Plan and Policy WLP 7 (Distribution of Homes), but not through formal allocations within the Wealden Local Plan.

Table 2 : Heathfield Settlement Alternative Sites Summary

SHELAA Reference	Site Address	SHELAA Summary (August, 2018)	Landscape Assessment Summary	Major Development in Context of the NPPF (Paragraph 116)	Recommendation
553/1210	Land at Tilsmore Lodge, Cross in Hand Road, Heathfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
632/1210	Land at Broadridge, Mutton Hall Hill, Heathfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
640/1210	Land at 25 Gibraltar Rise, Heathfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
641/1210	Land at the Manse, Tilsmore Road, Heathfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
642/1210	Land at 38 Downsview, Heathfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.

643/1210	Land at 40 Downsview, Heathfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
645/1210	Land at Tudor Lodge, Sandy Cross Lane, Heathfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
646/1210	Land at The Old Stable, Green Lane, Heathfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
647/1210	Land at Lullington, Tilsmore Road, Heathfield	Site considered too small for assessment	N/A	N/A	Site considered too small for assessment.
672/1210	Carradale, Willow Close, Heathfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
865/1210	The Yard, Burwash Road, Heathfield	Site considered too small for assessment	N/A	N/A	Site considered too small for assessment.
950/1210	Land to the rear of Idens Farm, Street End Lane, Broad Oak	Site considered too small for assessment	N/A	N/A	Site considered too small for assessment.

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959/1210	Little Rose, Meres Lane, Cross-In-Hand, Heathfield	Site considered too small for assessment	N/A	N/A	Site considered too small for assessment.
103/1210	The Cart Barn, Burwash Road, Heathfield	Site has planning permission at the time of the assessment.	N/A	N/A	The site has now been granted planning permission.
111/1210	Land at Tilsmore Lodge, Heathfield	Site has planning permission at the time of the assessment.	N/A	N/A	The site has now been granted planning permission.
260/1210	Land South of Burwash Road and East of Tower Street, Heathfield	Site has planning permission at the time of the assessment	N/A	N/A	The site has now been granted planning permission.
230/1210	Land South of Sandy Cross Lane, Monkhurst Farm, Heathfield	This site is contained partly within the High Weald AONB. The site is considered to form part of the attractive rural setting of Heathfield and development on the site would have a detrimental impact on the character and appearance of the area. In summary, it was considered that the development would have an	The site was considered within the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and it was stated that the site has a very low landscape capacity due to its very high sensitivity and very high landscape value. Its location within the High	The SHELAA confirms that the site is comprised of at least 12 hectares (gross) and given the scale of the site, would likely result in major	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.

258/1210	Land on North Side of Burwash Road (East of Markyle Lane), Heathfield	unjustified impact on the character and appearance of the landscape and was therefore considered 'not suitable'.	Weald AONB and the coherent ancient landscape pattern and good condition, gives the site a very high landscape value.	development in the context of paragraph 116 of the NPPF.	
	The sites lies in a prominent position in the High Weald AONB, at the fringes of Heathfield. It is considered that the development of the site would be visible from its surroundings and would have a detrimental impact on the character and appearance of the attractive, high quality landscape that surrounds the farm. Therefore, the development of the site was considered 'not suitable' in the SHELAA.	The site was classified as being in a very sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014), whilst the site was also considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that stated that the site had a low landscape capacity due to its very high sensitivity and high landscape value. It is suggested that the site's location adjacent to existing urban edge gives a slightly more limited sense of remoteness/tranquillity, but that this should be balanced against the coherent ancient landscape	The SHELAA confirms that the site is comprised of at least 3.48 hectares (gross) and given the scale of the site, it would likely result in major development in the context of paragraph 116 of the NPPF.		The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.

Development in the High Weald AONB

259/1210	Land West of Marklye Lane, Heathfield	The site lies in a prominent position in the High Weald AONB and because of its topography there are panoramic views northwards towards Mayfield. It is considered that development of the site would have a detrimental impact on the character and appearance of the attractive and high quality landscape which surrounds Heathfield. Therefore, the development of the site was considered 'not suitable' in the SHELAA.	The site was classified as being in a very sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014). The site was also considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a very low landscape capacity due to its very high sensitivity and very high landscape value. It is noted that its location within the High Weald AONB and the coherent ancient landscape pattern gives the site a high landscape value overall.	The SHELAA confirms that the site is comprised of at least 5.68 hectares (gross) and given the scale of the site, it would likely result in major development in the context of paragraph 116 of the NPPF.	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.
557/1210	Yulden Field, Barretts Park Farm, Heathfield	The SHELAA notes that development would be unsuitable in this location and out of keeping with the generally rural character and appearance of the	The site was classified as being in a very sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014). The site	The SHELAA confirms that the site is comprised of at least 1.81 hectares	The site is considered to be unsuitable for residential development in the context of its impact

		<p>countryside. The site is located within the High Weald AONB and was classified as being in a very sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) and it is stated within the SHELAA that the development would have an unjustified impact on the character and appearance of the landscape.</p>	<p>was also considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and very high landscape value. It is noted that the site's location within the High Weald AONB and strong sense of remoteness/tranquillity gives the site a high landscape value overall.</p>	<p>(gross), which would deliver a relatively modest housing site in the context of Heathfield. However, the site is not visually well contained within the settlement and would have a detrimental impact upon the High Weald AONB.</p>	<p>upon the High Weald AONB.</p>
<p>559/1210</p>	<p>Land at Junction of Sandy Cross Lane and Park Road, Heathfield</p>	<p>The SHELAA notes that development would be unsustainable in this location and out of keeping with the generally rural character and appearance of the countryside. The site is located adjacent to the High Weald AONB at a significant ridge-top and has been classified as being in a highly sensitive location within the</p>	<p>The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014). The site was also considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a moderate</p>	<p>The SHELAA confirms that the site is comprised of at least 1.08 hectares (gross), which would deliver a relatively modest housing site in the context of</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.</p>

Development in the High Weald AONB

560/1210	Land at Tintern, Cross in Hand	<p>Wealden Landscape & Settlement Character Assessment (November, 2014) and it is stated that the development would have an unjustified impact on the character and appearance of the landscape.</p>	<p>landscape capacity due to its low sensitivity and high landscape value. It is stated that the site has a strong sense of remoteness/tranquillity and contributes to the setting of the Registered Historic Park and Garden to the west, giving the site a high landscape value overall.</p>	<p>Heathfield. However, the site is not visually well contained within the settlement and would have a detrimental impact upon the adjacent High Weald AONB.</p>	
		<p>The SHELAA notes that the site comprises a house and large garden located on the western fringe of Heathfield. It is considered that on its own, it is unlikely this site could be advanced for development and that the house is likely to have a high existing use value and this is also likely to present a potential bar to development. The site is not located within the High Weald AONB.</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a high landscape capacity due to its low sensitivity and moderate landscape value. The site is not located within the High Weald AONB and the its location adjacent to the existing urban edge gives a limited sense of remoteness and/or tranquillity. However, the site does</p>	<p>The site is not located within the High Weald AONB.</p>	<p>The site is not located within the High Weald AONB. However, site by itself, is not expected to come forward and there are concerns relating to both the deliverability and the viability of the site.</p>

561/1210	Morrensfield, Little London Road, Cross In Hand	The SHELAA notes that the site comprises a house and large garden located on the western fringe of Heathfield. It is considered that on its own, it is unlikely this site could be advanced for development and that the house is likely to have a high existing use value and this is also likely to present a potential bar to development. The site is not located within the High Weald AONB.	The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a high landscape capacity due to its very low sensitivity and moderate landscape value. The site is not located within the High Weald AONB and its location adjacent to the existing urban edge gives a limited sense of remoteness and/or tranquility. However, the site does have private amenity value as a garden for the adjacent dwelling giving it a moderate landscape value overall.	The site is not located within the High Weald AONB.	The site is not located within the High Weald AONB. However, the site by itself is not expected to come forward and there are concerns relating to both the deliverability and the viability of the site.
565/1210	Lion's Lodge, Cross In Hand	The SHELAA notes that the site comprises a house and	The site was considered in the Wealden Local Plan	The site is not located within	The site is not located within the High Weald AONB.

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		<p>large garden located on the western fringe of Heathfield. It is considered that on its own, it is unlikely this site could be advanced for development and that the house is likely to have a high existing use value and this is also likely to present a potential bar to development. The site is not located within the High Weald AONB.</p>	<p>Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a high landscape capacity due to its very low sensitivity and moderate landscape value. The site is not located within the High Weald AONB and its location adjacent to the existing urban edge gives a limited sense of remoteness and/or tranquillity. However, the site does have private amenity value as a garden for the adjacent dwelling giving it a moderate landscape value overall.</p>	<p>the High Weald AONB.</p>	<p>However, the site by itself is not expected to come forward and there are concerns relating to both the deliverability and the viability of the site.</p>
<p>566/1210</p>	<p>Crossways House, New Pond Hill</p>	<p>The SHELAA notes that the site comprises a house and large garden located on the western fringe of Heathfield. It is considered that on its own, it is unlikely this site could be advanced for development, much like the sites above. The site is not</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a high landscape capacity due to its low sensitivity and moderate landscape value. The site is not located</p>	<p>The site is not located within the High Weald AONB.</p>	<p>The site is not located within the High Weald AONB. However, the site by itself is not expected to come forward and there are concerns relating to both the</p>

569/1210	Land at Leonards Field, Sandy Cross, Heathfield	located within the High Weald AONB.	within the High Weald AONB and its location adjacent to the existing urban edge gives a limited sense of remoteness and/or tranquillity. However, the site does have private amenity value as a garden for the adjacent dwelling giving it a moderate landscape value overall.		deliverability and the viability of the site.
		The SHELAA notes that the site as submitted cannot be provided with a suitable vehicular access to serve the development. It also notes that the site is within the High Weald AONB and has been classified as being in a highly sensitive location within the Wealden Landscape & Settlement Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and very high landscape value. It is stated that its location within the High Weald AONB and coherent	The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014). The site was also considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and very high landscape value. It is stated that its location within the High Weald AONB and coherent	The SHELAA confirms that the site is comprised of at least 1.08 hectares (gross), which would deliver a relatively modest housing site in the context of the Heathfield. However, the site is considered to have significant	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.

Development in the High Weald AONB

578/1210	Land north of Holbrook Barn, Heathfield	The SHELAA notes that the site is located in close proximity to the existing urban and built part of Heathfield to the south and south-east of the community centre and playing fields. However, it is considered that development would be out of keeping with the semi-rural character of this location and be out of keeping with surrounding land uses. It notes that development would also be required to take into account the proximity to the High Weald AONB which	ancient landscape pattern and good condition gives the site a very high landscape value.	detrimental effect on the High Weald AONB as discussed in the SHELAA and evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017).	
		The SHELA notes that the site is located in close proximity to the existing urban and built part of Heathfield to the south and south-east of the community centre and playing fields. However, it is considered that development would be out of keeping with the semi-rural character of this location and be out of keeping with surrounding land uses. It notes that development would also be required to take into account the proximity to the High Weald AONB which	The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a moderate landscape capacity due to its moderate sensitivity and moderate/high landscape value. The site is not located within the High Weald AONB, but is located adjacent to the boundary. It is considered that its moderate sense of	The site is not located within the High Weald AONB.	The site is not located within the High Weald AONB. Nevertheless, the site's position has meant that the development would be out of keeping with the semi-rural character of this location and be out of keeping with the surrounding, predominantly rural land uses.

639/1210	Land at Theobald's Green Farm, Heathfield	adjoins the south east and south western boundaries of the site.	remoteness/tranquility, and private amenity value as a garden for the adjacent dwelling gives the site a moderate/high landscape value.	The SHELAA confirms that the site is comprised of at least 5.85 hectares (gross) and given the scale of the site, it would likely result in major development in the context of paragraph 116 of the NPPF.	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.
The site is wholly contained within the High Weald AONB. It is considered within the SHELAA that development would have an unjustified impact on the character and appearance of the attractive and high quality landscape which surrounds Heathfield particularly in this area where the farm, associated buildings and fields are part of a historic field pattern, which is rare in this location. The main farmhouse is Grade II listed which further constrains the site. Therefore, the development of the site was considered 'not suitable' in the SHELAA.	The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should be noted that landscape setting area 3, in which the site is situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and high landscape value. It notes that the strong landscape structure of mature hedgerows, sunken lanes and Ancient Woodland contributes to an high landscape sensitivity overall.				

681/1210	Land at The Old Saddlery, Heathfield	<p>The site is part of a former historic farmstead known as Holbrook, now long since divided up with outbuildings converted in various residential uses. In terms of landscape issues, the SHELAA stated that housing development in this location would be out of keeping with the character and appearance of the area. It notes that there are imposing trees on this site and this would also present constraint to development. Therefore, the development of the site was considered 'not suitable' in the SHELAA.</p>	<p>The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. The site was also considered within the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a moderate landscape capacity due to its moderate sensitivity and high landscape value. It notes that there is a moderate sense of remoteness /tranquillity, and that the private amenity value as a garden for the adjacent dwelling gives the site a moderate/high landscape value.</p>	<p>The site is not located within the High Weald AONB.</p>	<p>The site is not located within the High Weald AONB. Nevertheless, the site's position on the edge of Heathfield has meant that the development would be out of keeping with the predominately rural character of this location and be out keeping with the surrounding low key residential uses that arise mainly due to the historic buildings and conversion of former farm buildings.</p>
734/1210	Land at Monkurst Farm, Sandy	<p>The site is wholly contained within the High Weald AONB on the southern fringe of Heathfield. The SHELAA</p>	<p>The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement</p>	<p>The SHELAA confirms that the site is comprised of at</p>	<p>The site is considered to be unsuitable for residential</p>

	<p>Cross, Heathfield</p>	<p>states that development would be unsuitable in this location and out of keeping with the generally rural character and appearance of the countryside. It notes that development would have an unjustified impact on the character and appearance of the attractive and high quality landscape which surrounds Heathfield, particularly in this location, where the fields are part of the historic field pattern that ought to be retained in line with High Weald AONB Management Plan.</p>	<p>Character Assessment (November, 2014) and having a low landscape capacity for accommodating development. The site was also considered within the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a very low landscape capacity due to its very high sensitivity and very high landscape value. It notes that its location within the High Weald AONB, the coherent ancient landscape pattern and good condition, and the presence of a Public Right of Way (PRoW) passing through the site give it a very high landscape value. It notes that the southern part of the site is the most sensitive as it is adjacent to Ancient Woodland, and gill woodlands that are particularly sensitive.</p>	<p>least 13.6 hectares (gross) and given the scale of the site, it would likely result in major development in the context of paragraph 116 of the NPPF.</p>	<p>development in the context of its impact upon the High Weald AONB.</p>
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Development in the High Weald AONB

798/1210	The Old Half Moon, Burwash Road, Heathfield	<p>The site is wholly located within the High Weald AONB and the site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) and development would have an unjustified impact on the character and appearance of the landscape. It notes that an open boundary exists with the Grade II listed building (the Old Half Moon) which is located adjacent to the southern boundary of the site and any development of this site would impact on the setting of this listed building which could not be suitably mitigated. Therefore, the development of the site was considered 'not suitable' in the SHELAA.</p>	<p>The site was also considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and high landscape value. It notes that its location adjacent to the existing urban edge and a busy road gives the site a limited sense of remoteness/tranquility and reduces the site's landscape value, but when balanced against the site's location within the High Weald AONB, its contribution to the setting of a listed building, it is considered that the site has a high landscape value overall. The eastern part of the site is the most sensitive as it lies directly adjacent to Ancient Woodland.</p>	<p>The SHELAA confirms that the site is comprised of at least 0.4 hectares (net), which would deliver a modest housing site in the context of Heathfield. However, the site is considered to have significant detrimental effect on the High Weald AONB as discussed in the SHELAA and evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017).</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.</p>
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829/1210	Land to the west of Nettlesworth Lane, Heathfield	The SHELAA notes that the site is wholly located within the High Weald AONB and has been classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) and it is considered that the development would have an unjustified impact on the character and appearance of the landscape. The SHELAA also states that the site is isolated and remote from local services and facilities, and moreover, it is considered that housing development would be unsustainable in this location and out of keeping with the generally rural character and appearance of the countryside. Therefore, the development of the site was considered 'not suitable' in the SHELAA.	The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should be noted that landscape setting area 2 and 3, in which the site is situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and high/very high landscape value. It notes that the strong landscape structure of mature hedgerows, sunken lanes and Ancient Woodland contributes to an high landscape sensitivity overall in this area.	The SHELAA confirms that the site is comprised of at least 7.8 hectares (gross) and given the scale of the site, it would likely result in major development in the context of paragraph 116 of the NPPF. The site is also detached from the settlement of Heathfield and is not considered to have a spatial relationship between the site and Heathfield itself.	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.
848/1210	Collins Field, Burwash Road, Heathfield	The SHELAA confirms that the site has high landscape sensitivity with extensive	The site was classified as being in a highly sensitive location within the Wealden	The SHELAA confirms that the site is	The site is considered to be unsuitable for

Development in the High Weald AONB

		<p>views of the High Weald AONB to the north of the site. It is considered that housing development would be out of keeping with the generally rural character and appearance of the countryside in this location. It is surmised that due to the site being classified as being located in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014), that the development would have an unjustified impact on the character and appearance of the landscape. Therefore, the development of the site was considered 'not suitable' in the SHELAA.</p>	<p>Landscape & Settlement Character Assessment (November, 2014) and having a low landscape capacity for accommodating development. The site was also considered within the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and high landscape value. It notes that its location adjacent to the existing development gives the site a slightly more limited sense of remoteness /tranquillity and reduces the site's landscape value, but this would be balanced against the site's location within the High Weald AONB, the coherent ancient landscape pattern and good condition, which gives the site a high landscape value overall. There are no significant</p>	<p>comprised of at least 3.97 hectares (gross) and given the scale of the site, it would likely result in major development in the context of paragraph 116 of the NPPF.</p>	<p>residential development in the context of its impact upon the High Weald AONB.</p>
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907/1210	Land on the west side of Newick Lane, Heathfield	The SHELAA confirms that the site has high landscape sensitivity with extensive views of the High Weald AONB to the north of the site. It is considered that housing development in this location would be out of keeping with the generally rural character and appearance of the countryside. It is concluded within the SHELAA that the site is isolated, exposed and wholly within the High Weald AONB where such development would have an unjustified impact on the character and appearance of the attractive and high quality landscape which surrounds Heathfield. Therefore, the development of the site was considered 'not suitable' in the SHELAA.	variations in landscape sensitivity within the site. The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should be noted that landscape setting area 1 for Heathfield, in which the site is situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and high landscape value. It notes that the small-scale patchwork of sloping, ancient pastoral fields and pockets of Ancient Woodland are valuable and sensitive landscape features. In addition, it is considered that key, panoramic views long distance views northwards across the High Weald	The SHELAA confirms that the site is comprised of at least 1.08 hectares (gross), which would deliver a relatively modest housing site in the context of Heathfield. However, the site is considered to have a significant detrimental effect on the High Weald AONB as discussed in the SHELAA and as evidenced in the Wealden Landscape &	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.
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Development in the High Weald AONB

912/1210	Land at Heathfield Park, Heathfield	<p>The SHELAA confirms that Heathfield Park is a Registered Park and Garden and contains a large area designated as SSSI, which runs through the centre of the site from north to south following a sunken wooden ghyll. In addition, there are large sections of the site that are ancient woodland and there is a Grade II* listed building (Gibraltar Tower) located in the north east of the site which dominates the landscape. The assessment notes that the setting of the listed building would be a significant constraint together with the ancient woodland and SSSI renders the site unsuitable for development. The site is also contained within the High Weald AONB and is classified as being in a</p>	<p>contribute to high land sensitivity.</p> <p>The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should be noted that landscape setting area 2 for Heathfield, in which the site is largely situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and very high landscape value. It notes that the area is situated within the High Weald AONB, and in addition, contains the valuable historic landscape of Heathfield Park resulting in a very high landscape value. Mature Ancient Woodlands, stream</p>	<p>Settlement Character Assessment (November, 2014).</p> <p>The SHELAA confirms that the site is comprised of at least 69.24 hectares (gross) and given the scale of the site, it would likely result in major development in the context of paragraph 116 of the NPPF.</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB and other cultural and ecological assets.</p>
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957/1210	Plantation House, Burwash Road, Heathfield	highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014). On this basis, the site was considered 'not suitable' within the SHELAA.	corridors and Heathfield Park are sensitive landscape features that result in the area having high landscape sensitivity.	The SHELAA confirms that the site is comprised of at least 0.2 hectares (net), which would deliver a modest housing site in the context of Heathfield. However, the site is considered to have significant detrimental effect on the High Weald AONB as discussed in the SHELAA	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB and its isolated location.
		The SHELAA confirms that the site comprises a single residential dwelling and garden located to the west of the urban area of Heathfield adjacent to the A265. It is considered that the site is unsuitable being rural in nature and isolated and remote from local services and facilities. Furthermore, the site is classified as being located in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) where new housing development would have an unjustified impact on the character and appearance of the landscape. Therefore, the development of the site	The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should be noted that landscape setting area 1 for Heathfield, in which the site is situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and high landscape value. It notes that the small-scale patchwork of sloping, ancient pastoral fields and pockets of Ancient Woodland are valuable and sensitive landscape features. In addition, it is		

Development in the High Weald AONB

275/1210	Parklands, Burwash Road, Heathfield	was considered 'not suitable' in the SHELAA.	considered that key, panoramic views long distance views northwards across the High Weald contribute to high land sensitivity.	and evidenced in the Wealden Landscape & Settlement Character Assessment (November, 2014).	
		The SHELAA confirms that in isolation, this site would be unsuitable because it does not have an existing vehicular /pedestrian access. However, this is a site where other potential housing sites have been identified in SHELAA in the immediate vicinity including land to the north of the site which has been granted planning permission for 20 dwellings (see planning reference WD/2016/2064/MEA). It is considered that additional structural planting would be needed to help reinforce the character and appearance of the High Weald AONB landscape (that the site is wholly contained within) and	The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and high landscape value. It notes that its location not far from the existing urban edge and a busy road gives the site a limited sense of remoteness/tranquility and reduces the site's landscape value, but this should be balanced against the site's location within the High Weald AONB and its contribution to the setting of the Registered Park and Garden to the south giving	The SHELAA confirms that the site is comprised of at least 0.8 hectares (gross), which would deliver a modest housing site in the context of Heathfield (the total capacity provided by the SHELAA is 10 dwellings).	The site is considered to be suitable for residential development in the context of the SHELAA and with the caveat that the site could be developed whilst meeting the requirements of paragraph 116 of the NPPF. However, in isolation, the SHELAA considers that the site would be unsuitable because it does not have an existing vehicular/

299/1210	15 Tower Street, Heathfield	<p>to ensure protection of the visual character of the adjacent Heathfield Park and listed building. The SHELAA considers the site to be suitable subject to the caveats above and meeting the requirements in paragraph 116 of the NPPF.</p>	<p>the site a high landscape value overall.</p>	<p>The SHELAA confirms that the site is comprised of at least 1.15 hectares (gross), which would deliver a modest housing site in the context of Heathfield (the total capacity provided by the SHELAA is 20 dwellings).</p>	<p>pedestrian access.</p>
		<p>The SHELAA confirms that the site comprises of a house, garden and grazing land located on the fringe of Heathfield with the majority of the site within the High Weald AONB. It is considered that the site is relatively enclosed from the wider landscape and that any development would need to respect its location next to the Registered Park and Garden of Heathfield Park and particularly to the Ancient Woodland at its boundary. It notes that if development was proposed within the Wealden Local Plan, there would be need to consider this submitted land comprehensively with other</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and high landscape value. It notes that its location not far from the existing urban edge and a busy road gives the site a limited sense of remoteness/tranquillity and reduces the site's landscape value, but this should be balanced against the site's location within the High Weald AONB and its contribution to the setting of the Registered Park and</p>	<p>The site is considered to be suitable for residential development in the context of the SHELAA and with the caveat that the site could be developed whilst meeting the requirements of paragraph 116 of the NPPF. However, it is considered that the other two allocated sites adjoining Heathfield would have a lesser impact upon the</p>	

Development in the High Weald AONB

562/1210	Pine Ridge Cottage, Little London Road, Heathfield	sites in this location. The SHELAA considers the site to be suitable subject to the caveats above and meeting the requirements in paragraph 116 of the NPPF.	Garden to the south giving the site a high landscape value overall.	The SHELAA confirms that the site is comprised of at least 1.5 hectares (net), which would deliver a moderate housing site in the context of Heathfield (the total capacity provided by the SHELAA is 45 dwellings).	High Weald AONB in landscape terms and could be appropriately mitigated.
		The SHELAA confirms that the site comprises a single residential property with a large residential curtilage located on the western fringe of Heathfield adjacent to the A276. Additional sites have been submitted to the SHELAA immediately adjacent to the site and it is therefore preferable if the site formed part of a comprehensive redevelopment of land to the west of the A267 with associated infrastructure. Only the dwelling and immediate garden is located outside the High Weald AONB. The remainder of the site is located within the High Weald AONB and therefore any development proposals would	The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a moderate landscape capacity due to its moderate landscape sensitivity and high landscape value. It notes that its location adjacent to the existing urban edge and a busy road gives the site a slightly more limited sense of remoteness/tranquility and reduces the site's landscape value, but this should be balanced against the site's location partly within the High Weald AONB, giving the site a	The site is considered to be suitable for residential development in the context of the SHELAA and with the caveat that the site could be developed whilst meeting the requirements of paragraph 116 of the NPPF. However, the existing dwelling will have a high use land value and access would be required to be achieved either from the A267 or via adjacent sites	

		<p>be required to meet the requirements in paragraph 116 of the NPPF. It notes that the land is not widely visible from long range views and any development would be seen against the existing built edge of the town. However, a number of landscaping measures would need to be in place that includes visual containment on the sites south eastern boundary to protect the amenity of adjacent properties. The existing dwelling will have a high use value and the development of the site may need to take account of these costs. Access would be required to be achieved either from the A267 or via adjacent sites should they come forward; this is uncertain. The SHELAA considers the site to be suitable subject to the caveats above and meeting the requirements in paragraph 116 of the NPPF.</p>	<p>high landscape value overall.</p>		<p>should they come forward; these issues are uncertain as well as the impact upon the highway.</p>
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Development in the High Weald AONB

564/1210	Old Common, Little London Road, Heathfield	<p>The SHELAA confirms that the site comprises a single residential property with a large residential curtilage located on the western fringe of Heathfield adjacent to the A276. Additional sites have been submitted to the SHELAA immediately adjacent to the site and it is therefore preferable if the site formed part of a comprehensive redevelopment of land to the west of the A267 to ensure the delivery of associated infrastructure. Only the dwelling and immediate garden is located outside the High Weald AONB. The remainder of the site is located within the High Weald AONB and therefore any development proposals would be required to meet the requirements in paragraph 116 of the NPPF. It notes that the land is not widely visible from long range views and any development would be seen against the existing built</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and very high landscape value. The assessment confirms that the site's location partly within the High Weald AONB, coherent historic landscape pattern and good condition give the site a very high landscape value.</p>	<p>The SHELAA confirms that the site is comprised of at least 1.2 hectares (net), which would deliver a moderate housing site in the context of Heathfield (the total capacity provided by the SHELAA is 36 dwellings).</p>	<p>The site is considered to be suitable for residential development in the context of the SHELAA and with the caveat that the site could be developed whilst meeting the requirements of paragraph 116 of the NPPF. However, the existing dwelling will have a high use land value and access would be required to be achieved either from the A267 or via adjacent sites should they come forward; these issues are uncertain as well as the impact upon the highway.</p>
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568/1210	St Aubyns, Little London Road, Heathfield	<p>edge of the town. However, a number of landscaping measures would need to be in place that includes visual containment on the sites south eastern boundary to protect the amenity of adjacent properties and to the northern boundary to protect the setting of St. Bartholomew's Church. The existing dwelling will have a high use value and the development of the site may need to take account of these costs. Access would be required to be achieved either from the A267 or via adjacent sites should they come forward; this is uncertain. The SHELAA considers the site to be suitable subject to the caveats above and meeting the requirements in paragraph 116 of the NPPF.</p>	The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified	The SHELAA confirms that the site is comprised of at least 0.3	The site is considered to be suitable for residential development in the
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Development in the High Weald AONB

		<p>of Heathfield adjacent to the A276. Additional sites have been submitted to the SHELAA immediately adjacent to the site and therefore the site would be suitable if it formed part of a comprehensive redevelopment of land to the west of the A267 with associated infrastructure. The assessment notes that only a small section of the western boundary of the site is located wholly within the High Weald AONB any development proposals would be required to meet the requirements in paragraph 116 of the NPPF. It is considered that although development would puncture the existing urban edge, any impacts on the AONB would be very localised. The land is also not widely visible from long range views and where it could be seen, it would be against the existing built edge of the town. The SHELAA considers the site to be suitable subject to the caveats</p>	<p>the site as having a high landscape capacity due to its very low sensitivity and moderate landscape value. The assessment confirms that the site's location adjacent to the existing urban edge gives a limited sense of remoteness/tranquility, and only a very small part of the edge of the site is within the High Weald AONB, but this should be balanced against its private amenity value as a garden for the adjacent dwelling that gives the site a moderate landscape value overall.</p>	<p>hectares (net), which would deliver a modest housing site in the context of Heathfield (the total capacity provided by the SHELAA is 9 dwellings). Only small section of the site is contained within the High Weald AONB.</p>	<p>context of the SHELAA and with the caveat that the site could be developed whilst meeting the requirements of paragraph 116 of the NPPF. However, the site would only be considered suitable if it formed part of a comprehensive redevelopment of land to the west of the A267 with associated infrastructure.</p>
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633/1210	Land at Heathfield Police Station, High Street, Heathfield	<p>above and meeting the requirements in paragraph 116 of the NPPF.</p> <p>The SHELAA confirms that this is a brownfield site comprising of a police station with ancillary land, buildings and car parking. The site is located within the town centre of Heathfield and lies within the existing development boundary, outside of the High Weald AONB. It also considered that the development would not be harmful to the wider landscape and suitable access already exist to the site. The SHELAA considers the site to be suitable for residential development of 8 (net) dwellings.</p>	<p>The site is located within the development boundary of Heathfield and was therefore not assessed within either of the landscape assessments.</p>	<p>The site is not located within the High Weald AONB.</p>	<p>The site is considered to be suitable for residential development in the context of the SHELAA and could come forward in line with policy WLP 7 (Distribution of Homes) of the Wealden Local Plan.</p>
644/1210	Land at and adjacent to Tilsmore Wood	<p>The SHELAA confirms that the site comprises of a single residential dwellings and garden located on the north western fringe of Heathfield adjacent to the A265. The site is visually contained by Ancient Woodland to the north</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a moderate landscape capacity due to its</p>	<p>The SHELAA confirms that the site is comprised of at least 0.5 hectares (net), which would deliver a</p>	<p>The site is considered to be suitable for residential development in the context of the SHELAA and with the caveat that the</p>

Development in the High Weald AONB

		<p>and hedgerows to the east and west. Landscape buffering would be required to protect the Ancient Woodland and hedgerows on the site and to reinforce existing field boundaries. The developable area has been reduced to take this into account. The site is wholly contained within the High Weald AONB. The SHELAA therefore considers the site to be suitable subject to the caveats above and meeting the requirements in paragraph 116 of the NPPF.</p>	<p>moderate sensitivity and high landscape value. The assessment confirms that the site's location adjacent to the existing urban edge gives a limited sense of remoteness/tranquillity and reduces the site's landscape value, but balanced against this is its location partly within the High Weald AONB, giving the site a high landscape value overall. It notes that the part of the site within the High Weald AONB and adjacent to Ancient Woodland are most sensitive.</p>	<p>moderate housing site in the context of Heathfield (the total capacity provided by the SHELAA is 15 dwellings).</p>	<p>site could be developed whilst meeting the requirements of paragraph 116 of the NPPF. However, it is considered that the other two allocated sites adjoining Heathfield would have a lesser impact upon the High Weald AONB in landscape terms and could be appropriately mitigated.</p>
<p>750/1210</p>	<p>Land at Snatchells Farm, Cross in Hand</p>	<p>The SHELAA confirms that the site is generally well located in relation to existing services and local facilities in Cross in Hand to the east and Heathfield to the west, and also public transport. The site is considered to be visually well contained by Ancient Woodland to the north east and hedgerows to the east</p>	<p>The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should be noted that landscape setting area 6 for Heathfield, in which the site is situated, is</p>	<p>The SHELAA confirms that the site is comprised of at least 0.8 hectares (net), which would deliver a moderate housing site in the context of</p>	<p>The site is considered to be suitable for residential development in the context of the SHELAA and with the caveat that the site could be developed whilst meeting the</p>

		<p>and west. Landscape buffering would be required to protect the Ancient Woodland and hedgerows on the site and to reinforce existing field boundaries. The developable area has been reduced to take this into account. It notes that the site is located wholly within the High Weald AONB; therefore, there is a requirement to demonstrate the site is essential to meet local needs and that other more suitable sites do not exist elsewhere. Given the sites location within the High Weald AONB, any development proposals would be required to meet the requirements in paragraph 116 of the NPPF.</p>	<p>considered to have a low landscape capacity as a result of high landscape sensitivity and high landscape value. The area is situated within the High Weald AONB, resulting in high landscape value. It notes that patches of Ancient Woodland further contribute to landscape value. The woodland and stream corridors contribute to a strong landscape structure, resulting in high landscape sensitivity.</p>	<p>Heathfield (the total capacity provided by the SHELAA is 24 dwellings).</p>	<p>requirements of paragraph 116 of the NPPF. However, it is considered that the other two allocated sites adjoining Heathfield would have a lesser impact upon the High Weald AONB in landscape terms and could be appropriately mitigated.</p>
<p>886/1210</p>	<p>Heathfield Ambulance Station, Burwash Road, Heathfield</p>	<p>The SHELAA confirms that this is a brownfield site comprising of an ambulance station with ancillary land, located on the northern fringe of Heathfield. The site is located within the town centre of Heathfield and lies within</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a moderate landscape capacity due to its low</p>	<p>The SHELAA confirms that the site is comprised of at least 0.09 hectares (net), which would deliver a</p>	<p>The site is considered to be suitable for residential development in the context of the SHELAA and could come forward in line</p>

		<p>the existing development boundary, but inside the High Weald AONB. It is considered that the development would not be harmful to the wider landscape and suitable access already exists to the site. However, given the site is located within the High Weald AONB, the site would still need to meet the requirements in paragraph 116 of the NPPF.</p>	<p>sensitivity and high landscape value. The assessment confirms that the site's location as part of existing development gives a limited sense of remoteness/tranquillity and reduces the site's landscape value, but this should be balanced against its location within the High Weald AONB that gives the site a high landscape value overall.</p>	<p>modest housing site in the context of Heathfield (the total capacity provided by the SHELAA is 6 dwellings).</p>	<p>with policy WLP 7 (Distribution of Homes) of the Wealden Local Plan when it is available to do so.</p>
307/1210	<p>Land at Tilsmore Nurseries, Off Nursery Way, Heathfield</p>	<p>The SHELAA confirms that the site is comprised of agricultural land on the northern fringe of Heathfield. It notes that the site is generally well located in relation to existing services and local facilities, and also to public transport. Development would be visible from the wider landscape to the north but generally the site has low landscape and visual sensitivity and is relatively well contained in local views. Ancient woodland lies</p>	<p>The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should be noted that landscape setting area 6 for Heathfield, in which the site is situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and high landscape value. The area</p>	<p>The SHELAA confirms that the site is comprised of at least 0.6 hectares (net), which would deliver a moderate housing site in the context of Heathfield (the total capacity provided by the SHELAA is 21 dwellings).</p>	<p>The site is considered to be suitable for residential development in the context of the SHELAA and with the caveat that the site could be developed whilst meeting the requirements of paragraph 116 of the NPPF. However, it is considered that the</p>

		<p>immediately north of the site, and abuts its boundary and landscape buffering would be needed within any housing scheme to protect the character and value of the woodland. The developable area has been reduced accordingly. The assessment confirms that the site is located wholly within the High Weald AONB and therefore any development proposals would be required to meet the requirements laid out in paragraph 116 of the NPPF</p>	<p>is situated within the High Weald AONB, resulting in high landscape value. It notes that patches of Ancient Woodland further contribute to landscape value. The woodland and stream corridors contribute to a strong landscape structure, resulting in high landscape sensitivity.</p>		<p>other two allocated sites adjoining Heathfield would have a lesser impact upon the High Weald AONB in landscape terms and could be appropriately mitigated. There are also uncertainties over its availability in the Plan period.</p>
<p>525/1210</p>	<p>Land to the rear of Rothershaw, High Street, Heathfield</p>	<p>The SHELAA notes that the site is constrained by the sloping topography and Ancient Woodland within the northern part of the site, but an area of land within the southern part of the site could be suitable for housing. It notes that should development in this location be proposed within the Council's Local Plan, there would be an opportunity to</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a moderate landscape capacity due to its moderate sensitivity and high landscape value. The assessment confirms that the site's location not far from the existing urban</p>	<p>The SHELAA confirms that the site is comprised of at least 0.6 hectares (net), which would deliver a moderate housing site in the context of Heathfield (the total capacity</p>	<p>Part of the site is considered to be suitable for residential development in the context of the SHELAA and with the caveat that the site could be developed whilst meeting the requirements of paragraph 116 of</p>

Development in the High Weald AONB

		<p>consider this land comprehensively with adjacent sites (SHELAA References 307/1210, 530/1210 and 595/1210). The access is a major constraint and could not sustain any more development without upgrade and it is highly likely that access would have to be achieved via adjacent land. In addition, the existing dwelling will have a high use value and the development of the site may need to take into account these costs. It notes that due to the sites location within the High Weald AONB there is a requirement to demonstrate development is essential to meet local needs and that other more suitable sites do not exist elsewhere.</p>	<p>edge and a busy road gives a slightly more limited sense of remoteness/tranquillity that reduces the site's landscape value, but balanced against this is its location partially within the High Weald AONB, giving the site a high landscape value overall. The northern two parcels of the site lie within the High Weald AONB, making it the most sensitive. This same area includes Ancient Woodland around a gill stream, this is a small area of Ancient Woodland which due to its size and location along a gill stream is known to be particularly sensitive, as recognised in the High Weald AONB Management Plan.</p>	<p>provided by the SHELAA is 21 dwellings).</p>	<p>the NPPF. In addition, the access is a major constraint and could not sustain any more development without upgrade and it is highly likely that access would have to be achieved via adjacent land. There are also viability concerns relating to the site due to existing land use values.</p>
<p>530/1210</p>	<p>Rutherford, Cross In Hand Road, Heathfield</p>	<p>The SHELAA confirms that the site comprises a single residential property and garden located on the northern fringe of Heathfield adjacent to the A265. It notes</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a high</p>	<p>The site is not located within the High Weald AONB.</p>	<p>The site is considered to be suitable for residential development in the context of the</p>

595/1210	Rothershaw, Cross in Hand	<p>that the site is well contained visually in the wider landscape to the north by thick woodland and the impact of development could be mitigated through landscaping and scheme design. The access is a major constraint and could not sustain any more development without upgrade and it is highly likely that access would have to be achieved via adjacent land. In addition, the existing dwelling will have a high use value and the development of the site may need to take into account these costs. As discussed above, should development in this location be proposed within the Council's Local Plan, there would be an opportunity to consider this land comprehensively with adjacent sites (SHELAA References 307/1210, 525/1210 and 595/1210).</p>	<p>landscape capacity due to its low sensitivity and moderate landscape value. Its location adjacent to the existing urban edge gives a limited sense of remoteness/tranquillity, giving the site a moderate landscape value.</p>	<p>The site is not located within</p>	<p>SHELAA. However, the access is a major constraint and could not sustain any more development without upgrade and it is highly likely that access would have to be achieved via adjacent land. There are also viability concerns relating to the site due to existing land use values.</p>	<p>The site is considered to be suitable for</p>
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Development in the High Weald AONB

	<p>Road, Heathfield</p>	<p>residential property and garden located on the northern fringe of Heathfield adjacent to the A265. It notes that the site is well contained visually in the wider landscape to the north by thick woodland and the impact of development could be mitigated through landscaping and scheme design. The access is a major constraint and could not sustain any more development without upgrade and it is highly likely that access would have to be achieved via adjacent land. In addition, the existing dwelling will have a high use value and the development of the site may need to take into account these costs. As discussed above, should development in this location be proposed within the Council's Local Plan, there would be an opportunity to consider this land comprehensively with adjacent sites (SHELAA References 307/1210, 525/1210 and 530/1210).</p>	<p>Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a high landscape capacity due to its low sensitivity and moderate landscape value. Its location adjacent to the existing urban edge gives a more limited sense of remoteness/tranquility, and it has private amenity value as a garden for the adjacent dwelling, giving the site a moderate landscape value overall.</p>	<p>the High Weald AONB.</p>	<p>residential development in the context of the SHELAA. However, the access is a major constraint and could not sustain any more development without upgrade and it is highly likely that access would have to be achieved via adjacent land. There are also viability concerns relating to the site due to existing land use values.</p>
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4.3 Wadhurst - Allocated Sites

Policy RUGA 5 - Allocation Land at Windmill House

4.18 Located on the south-western edge of Durgates area of Wadhurst on the B2100 Mayfield Lane in between Baldocks Road and Windmill Lane, this site is allocated for development of up to 20 dwellings provided it meets the site specific requirements outlined in Policy RUGA 5 of the Wealden Local Plan. The surrounding residential area provides low density housing at around 18 dwellings per hectare, but in order to maximise the use of land in the High Weald AONB in a sustainable location, it is considered that 30 dph should be achieved overall on the site. The site comprises of SHELAA Site 694/3330 totalling around 1.1 hectares and is defined on the Proposals Map as WAD1. The site includes a grassland field which slopes gently downhill towards the east with a pond and perimeter of mature trees on the southern and western edge. The northern boundary of the site includes a perimeter of trees with Tree Preservation Orders (TPO). The site is wholly located within the High Weald AONB.

4.19 In terms of Policy RUGA 5, criteria d) confirms that the layout and design of the development shall have regard to its location within the High Weald Area of Outstanding Natural Beauty and that the scheme should promote local distinctiveness through good design including the sensitive layout of spaces, the provision of soft landscaping, the use of local materials and a consideration of the character of the area. The policy also notes that landscaping through the provision of tree and hedge planting shall be provided on site boundaries, particularly the western and eastern boundaries.

Major Development Classification

4.20 Within the 'settlement hierarchy' that is contained within the Wealden Local Plan, the village of Wadhurst is categorised as a 'Large Village - type 1', which are described as the largest villages within the District which are either very accessible by public transport with good local facilities or accessible by public transport with good local facilities. The village centres are considered to be able accommodate a range of shops and businesses which meets the day to day needs of the village and wider areas. As of the 2011 Census, the Parish of Wadhurst had 2,023 households and this likely to be higher given the time elapsed between the Census and present. The allocation of Land at Windmill House equates to 20 (net) dwellings and would represent a limited increase to households in the Parish (the allocation equates to just under 1% of the total households in the Parish).

4.21 In terms of the spatial relationship between the allocation and the existing settlement, the allocation is located on the southern edge of Durgates, off the B2100 on the western side of Wadhurst and is surrounded by residential properties in all directions, but particularly to the east along Baldock Road. The site is visually well contained, with substantial residential development to the east and north of the site, with more sporadic development to the south and west. The Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) states that the site has a moderate landscape capacity due to its moderate sensitivity and high landscape value. It is stated that its location

adjacent to existing urban edge gives a more limited sense of remoteness/tranquillity and reduces the Site's landscape value, but balanced against this is its location within the High Weald AONB giving the site a high landscape value overall. It is stated within the landscape assessment that the site has a strong visual connectivity with the settlement.

4.22 It is noted that there are a number of features to the site that should be safeguarded where possible that includes field boundaries and their vegetation and existing mature trees that help to visually contain the site. In terms of the extent to which these landscape impacts could be moderated, the evidence base states that the planting of additional trees to maintain the character of Windmill Lane and to help screen the development in views from the Lane is desirable, as is the positive management of key feature characteristics of the High Weald AONB that are retained and/or restored on site and around the boundary ensuring their character, condition, value and multiple benefits for people and wildlife are retained.

4.23 It is considered that a proposal of this scale (i.e. no more than 20 dwellings) in the context of Wadhurst would not normally be described as major development. In conclusion, it is considered that the scale of the proposed allocation in the context of Wadhurst would be modest, given its edge of settlement location and limited scale. Despite the edge of settlement location, it is considered that the development of the site would still have the potential to erode some key landscape features of the High Weald AONB as summarised above, albeit that the allocation is visually well contained in the context of existing residential development. It is considered that policy RUGA 5 of the Wealden Local Plan, and specifically criteria c) and d) would mitigate those issues identified in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and as such, the proposed allocation would not likely result in major development within the High Weald AONB. In particular, criteria c of the policy RUGA 5 confirms that the boundary vegetation, mature trees and pond must be protected, retained, enhanced and appropriately buffered and managed. It also notes that such features must be incorporated into the overall design of the development to retain and improve the green network including the management of the trees and pond area. On a precautionary basis, an assessment against the public interest tests set out in the NPPF (March, 2012) and revised NPPF (July, 2018) are set out below.

NPPF Public Interest Test	Justification
<p>a) the need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.</p>	<p>A sufficient supply of housing land is needed on both a district wide and local level to meet the housing requirements set out within Policy WLP 1 (Provision of Homes and Jobs) of the Wealden Local Plan and affordable housing particularly, where it is known that at least 19 households were 'in need' of affordable housing within the Wadhurst settlement (see Housing Needs Survey Report - Wealden District: Settlements in Areas of Outstanding Natural Beauty August, 2016). Wadhurst is described in the Wealden Local Plan 'settlement hierarchy' as a 'sustainable settlement' in the District and is therefore expected to meet its own housing needs where it is appropriate to do so in the context of the environmental constraints of the site, including its landscape impact. The impact of not allocating land for housing development within/adjoining Wadhurst would be significant, as both retail and employment land would rely upon household growth within and adjoining the village. All sites across the district have been</p>

NPPF Public Interest Test	Justification
	<p>assessed as part of the SHELAA and Sustainability Appraisal that accompanies the Wealden Local Plan. The Sustainability Appraisal also considers the relative merits of settlements, particularly taking into account the relative impact upon environmental designations which includes, but is not limited to, the relative impacts of settlements in relation to Ashdown Forest SAC. In this regard, there are benefits to developing in this area compared to other settlements within the District.</p>
<p>b) the cost of, and scope of, developing outside the designated area, or meeting the need for it in some other way.</p>	<p>The High Weald AONB designation washes over the entirety of Wadhurst and extends a further 8km to the north of the settlement before it ends. As a result, no development can be located outside of the High Weald AONB and still specifically relate to Wadhurst. If development was located at the nearest sustainable location outside of the High Weald AONB (such as Tunbridge Wells), this would deliver development that would not necessarily benefit or relate in any way to meeting the local housing needs of Wadhurst. In addition, whilst it is preferable to accommodate new housing development on Previously Developed Land (PDL) rather than greenfield land, it is not considered appropriate to deliver new housing solely through the use of PDL in Wadhurst. Indeed, Policy WLP 7 (Distribution of Homes) of the Wealden Local Plan confirms that a windfall allowance is supported within the development boundary of Wadhurst, which will reduce opportunities to deliver new housing development within the existing settlement in any case.</p>
<p>c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</p>	<p>The SHELAA site reference for the allocation (694/3330) has been considered through the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and has been described as having low visibility, moderate landscape sensitivity, high landscape value and moderate landscape capacity. The sites location is adjacent to the existing urban edge of the settlement and the nearby busy road gives a more limited sense of remoteness/tranquillity and reduces the site's landscape value, but balanced against this is its location within the High Weald AONB, giving the site a high landscape value overall. The impact of the potential housing development upon the High Weald AONB in this location includes the impact on existing historic field boundaries and existing mature tree. These issues are considered under criteria c) and d) of Policy RUGA 5 (Allocation Land at Windmill House) of the Wealden Local Plan and will be moderated through the planning application process. This planning policy requires that such boundary vegetation, mature trees and pond must be protected, retained, enhanced and appropriately buffered and managed.</p>

Policy RUGA 6 - Allocation Land at High Street

4.24 This site is located to the south of High Street in Wadhurst and is allocated for the development of up to 10 dwellings provided it meets the site specific requirements outlined in Policy RUGA 6 in the Local Plan. The site comprises of SHELAA Site 702/3330 and of around 0.8 hectares and is defined on the Proposals Map as WAD2. The land submitted as part of the SHELAA process includes the Wadhurst Commemoration Hall, associated parking and the sports pitch and pavilion to the south of the High Street. The land has been made available for the provision of new modern Commemoration Hall, associated car parking, the creation of a Memorial Garden on the High Street frontage and enabling development of housing to be provided with a proportion designed to accommodate older people. The site includes amenity grassland which is being used as a sports/recreation ground which slopes gently downhill towards the south, with no current vegetated or fenced boundary. The site therefore benefits from long ranging views south over the High Weald AONB landscape. To minimise potential impacts, any proposed development must consider landscape characteristics in and out of the site, its High Weald AONB location and the setting of the Listed Buildings and Conservation Area in the design of the site.

4.25 In terms of the policy RUGA 6, criteria e) confirms that that layout and design of the development shall have regard to its location within the High Weald AONB and shall be determined through a landscape and visual impact assessment taking into account the setting of the High Weald AONB. It notes that the assessment shall inform the layout, architectural and landscape design of the development and will aim to enhance local distinctiveness and soften the urban edge. In addition, the planning policy notes that the layout and design of the development shall also have regard to the setting of Listed Buildings in the village centre and the Conservation Area.

Major Development Classification

4.26 Within the 'settlement hierarchy' that is contained within the Wealden Local Plan, the village of Wadhurst is categorised as a 'Large Village - type 1', which are described as the largest villages within the District which are either very accessible by public transport with good local facilities or accessible by public transport with good local facilities. The village centres are considered to be able accommodate a range of shops and businesses which meets the day to day needs of the village and wider areas. As of the 2011 Census, the Parish of Wadhurst had 2,023 households and this likely to be higher given the time elapsed between the Census and present. The allocation of Land at High Street equates to 10 (net) dwellings and would represent a limited increase to households in the Parish (the allocation equates to just under 0.5% of the total households in the Parish).

4.27 In terms of the spatial relationship between the allocation and the existing settlement, the site is located on a ridge, but is generally level and gently slopes downhill towards the south, although the edge of the site has no vegetated or fenced boundary and continues on into a further sports/recreation field that is separate from the allocation. To the western edge lies adjacent to Washwell Lane, which contains residential development, with the northern edge lying adjacent with the High Street that also contains linear development along the roadside. To the east is Uplands Community College and ancillary uses. The site is therefore visually well contained with the exception of the

southern boundary and would relate well with the existing settlement. The Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) states that the site has a moderate landscape capacity due to its moderate sensitivity and high landscape value. The assessment states that the degradation of landscape features which contribute to a coherent landscape pattern reduces the site's value, but balanced against this, its location within the High Weald AONB gives the site a high landscape value overall.

4.28 It is noted that there a number features of the site that should be safeguarded where possible that includes the trees and hedgerows surrounding the site that contributes to green infrastructure and visually contains the site, and also helps to restrict views from existing nearby properties. Given the sites location within the High Weald AONB, where the priority is to enhance the architectural quality of the area, it is considered that the use of local materials and the sensitive layout of spaces and soft landscaping in the development of the site would help enhance the distinctive local settlement character, in line with the High Weald AONB Management Plan.

4.29 It is considered that a proposal of this scale (i.e. no more than 10 dwellings) in the context of Wadhurst would not normally be described as major development. In conclusion, it is considered that the scale of the proposed allocation in the context of Wadhurst would be modest, given its location on the edge of the settlement and limited scale. Despite the edge of settlement location, it is considered that the development of the site would still have the potential to erode some key landscape features of the High Weald AONB as summarised above, albeit that the allocation is visually well contained in the context of existing development that surrounds the site to the west, north and east. It is considered that policy RUGA 6 (Allocation Land at High Street) of the Wealden Local Plan, and specifically criteria b) and e) would mitigate those issues identified in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and as such, the proposed allocation would not likely result in major development within the High Weald AONB. Specifically, the planning policy confirms that the development would be required to retain the rural character of Washwell Lane, and the layout and design of the development shall also have regard to the setting of Listed Buildings in the village centre and the Conservation Area and will require the sensitive layout of spaces, the provision of soft landscaping, the use of local materials and a consideration of the overall character of the area. On a precautionary basis, an assessment against the public interest tests set out in the NPPF (March, 2012) and revised NPPF (July, 2018) are set out below.

NPPF Public Interest Test	Justification
a) the need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.	A sufficient supply of housing land is needed on both a district wide and local level to meet the housing requirements set out within Policy WLP 1 (Provision of Homes and Jobs) of the Wealden Local Plan and affordable housing particularly, where it known that at least 19 households were 'in need' of affordable housing within the Wadhurst settlement (see Housing Needs Survey Report - Wealden District: Settlements in Areas of Outstanding Natural Beauty August, 2016). Wadhurst is described in the Wealden Local Plan 'settlement hierarchy' as a 'sustainable settlement' in the District and is therefore expected to meet its own housing needs where it is appropriate to do so in the context of the environmental constraints of the site, including its landscape impact. The impact

NPPF Public Interest Test	Justification
	<p>of not allocating land for housing development within/adjoining Wadhurst would be significant, as both retail and employment land would rely upon household growth within and adjoining the village. All sites across the district have been assessed as part of the SHELAA and Sustainability Appraisal that accompanies the Wealden Local Plan. The Sustainability Appraisal also considers the relative merits of settlements, particularly taking into account the relative impact upon environmental designations which includes, but is not limited to, the relative impacts of settlements in relation to Ashdown Forest SAC. In this regard, there are benefits to developing in this area compared to other settlements within the District.</p>
<p>b) the cost of, and scope of, developing outside the designated area, or meeting the need for it in some other way.</p>	<p>The High Weald AONB designation washes over the entirety of Wadhurst and extends a further 8km to the north of the settlement before it ends. As a result, no development can be located outside of the High Weald AONB and still specifically relate to Wadhurst. If development was located at the nearest sustainable location outside of the High Weald AONB (such as Tunbridge Wells), this would deliver development that would not necessarily benefit or relate in any way to meeting the local housing needs of Wadhurst. In addition, whilst it is preferable to accommodate new housing development on Previously Developed Land (PDL) rather than greenfield land, it is not considered appropriate to deliver new housing solely through the use of PDL in Wadhurst. Indeed, Policy WLP 7 (Distribution of Homes) of the Wealden Local Plan confirms that a windfall allowance is supported within the development boundary of Wadhurst, which will reduce opportunities to deliver new housing development within the existing settlement in any case.</p>
<p>c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</p>	<p>The SHELAA site reference for the allocation (702/3330) has been considered through the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and has been described as having high visibility, moderate landscape sensitivity, high landscape value and moderate landscape capacity. As noted above, the site has extensive views from the south, although the development would be viewed against the existing backdrop of the settlement adjacent to the site; the remaining views from alternative directions are largely limited by the existing built environment that surrounds the site. Given the sites central location within Wadhurst, the development of this site is considered to be associated more with the urban core than natural landscape, with the aim to enhance local distinctiveness and soften the urban edge with structural planting. The protection of the historic environment is also considered under criteria e) of Policy RUGA 6 (Allocation Land at High Street) of the Wealden Local Plan and will be moderated through the planning application process.</p>

Policy RUGA 7 - Allocation Land East of Old Station Road

4.30 The site is located on the northern edge of Durgates in Wadhurst, to the east of Old Station Road and to the north of Western Road, with the site allocated for development of up to 21 dwellings provided it meets the site specific requirements outlined in Policy RUGA 7 (Allocation Land East of Old Station Road) in the Wealden Local Plan. The site comprises SHELAA Site 115/3330 that totals around 0.8 hectares and is defined on the Proposals Map as WAD3. A number of residential properties on Western Road lie to the south and commercial office development abuts the site to the east. The site lies fully within the High Weald AONB and consists of a field with hedgerow, mature trees and a strong tree line at its southern and eastern boundaries, which effectively screens the site from the residential properties. The boundary treatment to Old Station Road comprises trees and hedgerows and contributes to the rural lane character of the immediate surrounding area. It is noted that the design of the development will need to account for the features that will assist in meeting the targets in the High Weald AONB Management Plan including hedgerows and the retention of mature trees. For this site, it will also be important to strengthen boundary features to the north to provide a soft urban edge to protect views into the development from the High Weald AONB. To maximise the use of this sustainable location and also to maximise land take in the High Weald AONB when allocating a site, it is considered that around 30 dwellings per hectare should be achieved overall on the site.

4.31 In terms of the policy RUGA 7 (Allocation East of Old Station Road), criteria b) confirms that apart from where vehicular and pedestrian access is required, the hedgerows and mature trees along the northern, eastern, southern and western boundary must be protected, retained, enhanced, appropriately buffered and managed. In particular, the strengthening of the hedgerow on the northern boundary will assist to mitigate and screen views into the site from the surrounding area to protect views into the development site from the surrounding High Weald AONB and will assist in strengthening the green network. Criteria d) of policy RUGA 7 (Allocation Land East of Old Station Road) confirms that the layout and design of the development shall have regard to its location within the High Weald AONB and shall be determined through a landscape and visual impact assessment taking into account the setting of the High Weald AONB. It notes that the design will require the sensitive layout of spaces, the provision of soft landscaping, the use of local materials and a consideration of the character of the area.

Major Development Classification

4.32 Within the 'settlement hierarchy' that is contained within the Wealden Local Plan, the village of Wadhurst is categorised as a 'Large Village - type 1' that are described as the largest villages within the District which are either very accessible by public transport with good local facilities or accessible by public transport with good local facilities. The village centres are considered to be able accommodate a range of shops and businesses which meets the day to day needs of the village and wider areas. As of the 2011 Census, the Parish of Wadhurst had 2,023 households and this likely to be higher given the time elapsed between the Census and present. The allocation of Land at High Street equates to 21 (net) dwellings and would represent a limited increase to households in the Parish

(the allocation equates to 1.04% of the total households in the Parish). An recent appeal decision on the allocation site determined in 2016 (see planning reference WD/2015/1147/MAO) for the provision of 31 (net) dwellings confirmed, in agreement with the Council at that time, that the development would amount to a small proportion of the overall village and thereby concluded that the scheme would not be major development in the context of paragraph 116 of the NPPF.

4.33 In terms of the spatial relationship between the allocation and the existing settlement, the recent appeal decision (see planning reference WD/2015/1147/MAO) stated summarised that the site represented land outside the village settlement within the open countryside and made contribution to the separation between these areas. It was concluded that in character and appearance terms, the site more closely associated with the countryside than the developed parts of the settlement with which it is contiguous. This was in part due to the strong tree line at its southern and eastern boundary which effectively screens the site from residential properties to the south and provided a degree of separation between the settlement and countryside. However, in terms of its formal relationship with the settlement, the site is in part surrounded by existing development that includes residential dwellings to the south, a recent commercial office to the east, and to the west of the site has a boundary with Old Station Road. As a consequence, if the allocation was to come forward, then the northern boundary of the allocation would effectively form the new boundary to the settlement.

4.34 The Wealden Landscape and Settlement Character Assessment - Supplementary Report (November, 2016) noted that allocation is situated on land that has a very high landscape sensitivity. The land is adjacent to a key ridge line for the High Weald AONB. A relatively recent appeal decision on the site for the provision of 31 (net) dwellings and access onto the Old Station Road (see planning reference WD/2015/1147/MAO), although dismissed, concluded that whilst the site is relatively contained within the wider landscape, and the development may not affect wider long distance views, this cannot be the sole test. The AONB is a wide and large expanse of area and any development which significantly detracts from elements which contribute to that wider natural and scenic beauty do not conserve or enhance it. It was noted in the appeal decision that the density of the development (at 31 (net) dwellings) would result in a density that would result in a particularly urban grain and form of development in a small irregularly shaped. This has been reduced through the allocation to only 21 (net) dwellings. Furthermore, the appeal decision noted that the trees form an important contribution to the separation of the settlement and the countryside and any development would need to provide sufficient structural landscaping, along the northern boundary and within the site, to move this barrier effect to the edge of what would become the new settlement edge. This is specifically outlined under criteria b) of policy RUGA 7 (Allocation Land East of Old Station) that states that the strengthening of the hedgerow on the northern boundary will assist to mitigate and screen views into the site from the surrounding area to protect views into the development from the surrounding High Weald AONB.

4.35 It is considered that a proposal of this scale (i.e. no more than 21 dwellings) in the context of Wadhurst would not normally be described as major development and that the same conclusion was reached by the Planning Inspectorate with respect to an recent

appeal decision (see planning reference WD/2015/1147/MAO) in 2016 that related to a denser development of at least 31 (net) dwellings. In conclusion, it is considered that the scale of the proposed allocation in the context of Wadhurst would be modest, given its location on the edge of the settlement and limited scale. Despite the edge of settlement location, it is considered that the development of the site would still have the potential to erode some key landscape features of the High Weald AONB as summarised above, albeit that the allocation is visually well contained in the context of existing development and mature tree boundaries that surround the site to the west, south and east. It is considered that policy RUGA 7 (Allocation Land East of Old Station Road) of the Wealden Local Plan, and specifically criteria b) and d) would mitigate those issues identified in the most recent appeal decision (see planning reference WD/2015/1147/MAO) particularly in terms of strengthening the hedgerow on the northern boundary of the site to mitigate and screen views into the site from the surrounding area and to protect views into the development from the surrounding High Weald AONB. Although the allocation is not considered to be major development in the context of paragraph 116 of the NPPF, on a precautionary basis, an assessment against the public interest tests set out in the NPPF (March, 2012) and revised NPPF (July, 2018) are set out below.

NPPF Public Interest Test	Justification
<p>a) the need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.</p>	<p>A sufficient supply of housing land is needed on both a district wide and local level to meet the housing requirements set out within Policy WLP 1 (Provision of Homes and Jobs) of the Wealden Local Plan and affordable housing particularly, where it known that at least 19 households were 'in need' of affordable housing within the Wadhurst settlement (see Housing Needs Survey Report - Wealden District: Settlements in Areas of Outstanding Natural Beauty August, 2016). Wadhurst is described in the Wealden Local Plan 'settlement hierarchy' as a 'sustainable settlement' in the District and is therefore expected to meet its own housing needs where it is appropriate to do so in the context of the environmental constraints of the site, including its landscape impact. The impact of not allocating land for housing development within/adjoining Wadhurst would be significant, as both retail and employment land would rely upon household growth within and adjoining the village. All sites across the district have been assessed as part of the SHELAA and Sustainability Appraisal that accompanies the Wealden Local Plan. The Sustainability Appraisal also considers the relative merits of settlements, particularly taking into account the relative impact upon environmental designations which includes, but is not limited to, the relative impacts of settlements in relation to Ashdown Forest SAC. In this regard, there are benefits to developing in this area compared to other settlements within the District.</p>
<p>b) the cost of, and scope of, developing outside the designated area, or meeting the need for it in some other way.</p>	<p>The High Weald AONB designation washes over the entirety of Wadhurst and extends a further 8km to the north of the settlement before it ends. As a result, no development can be located outside of the High Weald AONB and still specifically relate to Wadhurst. If development was located at the nearest sustainable location outside of the High Weald AONB (such as Tunbridge Wells), this would deliver development that would not necessarily benefit or relate in any way to meeting the local housing needs of Wadhurst. In addition, whilst it is preferable to accommodate new housing development on Previously Developed Land (PDL) rather than greenfield land, it is not considered appropriate to deliver new housing solely through the use of PDL in Wadhurst. Indeed, Policy WLP 7 (Distribution of Homes) of the Wealden Local Plan confirms that a windfall</p>

NPPF Public Interest Test	Justification
	allowance is supported within the development boundary of Wadhurst, which will reduce opportunities to deliver new housing development within the existing settlement in any case.
c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	The site is considered to be visually, relatively well contained. However, it was considered within the Inspectors appeal decision (see planning reference WD/2015/1147/MAO) that the trees form an important contribution to the separation of the settlement and the countryside and that any development would need to provide sufficient structural landscaping, along the northern boundary and within the site, to move this structural barrier to the edge of what would become the new settlement edge. It is noted that in terms of mitigation, this is specifically outlined under criteria b) of policy RUGA 7 (Allocation Land East of Old Station) that states that the strengthening of the hedgerow on the northern boundary will assist to mitigate and screen views into the site from the surrounding area to protect views into the development from the surrounding High Weald AONB. If the development scheme follows the criteria in policy RUGA 7 (Allocation Land East of Old Station) of the Wealden Local Plan, it is considered that there are opportunities to improve the landscape, and moreover, moderate any detrimental effect upon the environment.

Policy RUGA 8 - Allocation Land at Foxhole Farm

4.36 The proposed allocation at Foxhole Farm is situated on the B2099 to the south east of Wadhurst village centre and to the north-west of Foxhole Lane. The site is located wholly within the High Weald AONB and consists of a medieval cohesive grassland field with Ancient Woodland and a pond located in the south-western corner. The site is allocated for the development of up to 40 dwellings provided it meets the site specific requirements outlined in Policy RUGA 8 (Allocation Land at Foxhole Farm) in the Wealden Local Plan. The site comprises of SHELAA Site 592/3330 that totals around 2.2 hectares and is defined on the Proposals Map as WAD4. The site comprises of a small grassland field which slopes gently downhill towards the west and is enclosed by mature hedgerows. The site is also adjacent (to the north-west) a development site with planning permission for 35 (net) dwellings (see planning reference WD/2014/2320/MEA) that is currently underway. The building line of this allocation site would therefore follow the built form of that development once the adjacent site is developed. Land allocated a Foxhole Farm is relatively visually contained with a strong perimeter hedgerow and Ancient Woodland along the road frontage and this is reflected with the proposed density of 30 dwellings per hectare.

4.37 In terms of the policy RUGA 8, criteria f) confirms that that layout and design of the development shall have regard to its location within the High Weald AONB and shall be determined through a landscape and visual impact assessment taking into account the setting of the High Weald AONB. It notes that the design will require the sensitive layout of spaces, the provision of soft landscaping, the use of local materials and a consideration of the character of the area. Criteria c) and d) of policy RUGA 8 relate to the protection and enhancement of Ancient Woodland, boundary hedgerows and mature trees on the boundaries to the site.

Major Development Classification

4.38 Within the 'settlement hierarchy' that is contained within the Wealden Local Plan, the village of Wadhurst is categorised as a 'Large Village - type 1', which are described as the largest villages within the District which are either very accessible by public transport with good local facilities or accessible by public transport with good local facilities. The village centres are considered to be able accommodate a range of shops and businesses which meets the day to day needs of the village and wider areas. As of the 2011 Census, the Parish of Wadhurst had 2,023 households and this likely to be higher given the time elapsed between the Census and present. The allocation of Land at High Street equates to 40 (net) dwellings and would represent a modest increase to households in the Parish (the allocation equates to just under 1.98% of the total households in the Parish).

4.39 In terms of the spatial relationship between the allocation and the existing settlement, the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) stated that the site had a strong sense of seclusion afforded by its thick and tall vegetation, but it also feels very separate from Wadhurst, as a result of the site having little visual connection to the rest of Wadhurst. However, it should be noted that the gap between the settlement and the allocation site has been granted planning permission for 35 (net) dwellings (see planning reference WD/2014/2320/MEA) that is under construction

and as a consequence, the allocation site would effectively join the linear development along the B2099 that reaches the core of the settlement and the sense of place would have deteriorated. In addition, there is a substantial and permanent boundary of Ancient Woodland to the south-east and east of the site that would limit further opportunities for further development along the B2099. It is noted that the site has a moderate sense of tranquillity, with the very southern part of site affected by noise from the B2099, but this diminishes rapidly further north.

4.40 The Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) states that the site has a low landscape capacity due to its moderate sensitivity and very high landscape value. The assessment states that due to its location within the High Weald AONB, strong sense of remoteness/tranquillity in parts of the site and coherent historic landscape pattern and good condition, the site has a very high landscape value. However, as discussed above, the adjacent development site was not considered as part of this landscape capacity report, but would likely diminish the strong sense of remoteness and tranquillity of the site particularly at its north western boundary. The site assessment notes that the southern part of the site is most sensitive as this area directly abuts a small, fragmented Ancient Woodland, which is particularly vulnerable to change. The assessment confirms that there are a number of mitigation measures that could be implemented to ensure that key qualities/features are safeguarded, which includes the protection of the historic field boundaries and their vegetation and the maintenance of a buffer to the Ancient Woodland; the retention of Ancient Woodland and enhanced ecological functioning of woodland are targets in the High Weald AONB Management Plan. Such mitigation measures have been included within Policy RUGA 8 (Allocation Land at Foxhole Farm) under criteria c) and d). It is noted that the site is well screened via mature trees at the site boundaries and therefore the development of the site would have a more limited impact upon the wider landscape.

4.41 It is considered that a proposal of this scale (i.e. no more than 40 dwellings) in the context of Wadhurst would not normally be described as major development, and moreover, the adjacent planning application for 35 (net) dwellings (see planning reference WD/2014/2320/MEA) was similarly not considered as major development in the context of Wadhurst. Nevertheless, it is considered that the development of the site would still have the potential to erode some key landscape features of the High Weald AONB as summarised above, albeit that the allocation is visually well contained in the context of existing site boundaries that contain Ancient Woodland, mature trees and hedgerows. It is considered that policy RUGA 8 (Allocation Land at Foxhole Farm) of the Wealden Local Plan, and specifically criteria c), d) and f) would mitigate those issues identified in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017). Indeed, the planning policy notes that Ancient Woodland must be protected, retained, enhanced and managed, including the provision of a suitable buffer that contributes positively and enhances the green infrastructure network and that the boundary hedgerows and mature trees must be protected, retained, enhanced, restored, strengthened and managed to account for their historic landscape value and to protect and improve their wildlife corridor, connectivity, ecological and screening functions. Taking into account the planning policy above, and its achievement through the planning application process, it is considered that the allocation would not severely harm the characteristic features of the High Weald

AONB at the site. On a precautionary basis, an assessment against the public interest tests set out in the NPPF (March, 2012) and revised NPPF (July, 2018) are set out below.

NPPF Public Interest Test	Justification
<p>a) the need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.</p>	<p>A sufficient supply of housing land is needed on both a district wide and local level to meet the housing requirements set out within Policy WLP 1 (Provision of Homes and Jobs) of the Wealden Local Plan and affordable housing particularly, where it is known that at least 19 households were 'in need' of affordable housing within the Wadhurst settlement (see Housing Needs Survey Report - Wealden District: Settlements in Areas of Outstanding Natural Beauty August, 2016). Wadhurst is described in the Wealden Local Plan 'settlement hierarchy' as a 'sustainable settlement' in the District and is therefore expected to meet its own housing needs where it is appropriate to do so in the context of the environmental constraints of the site, including its landscape impact. The impact of not allocating land for housing development within/adjoining Wadhurst would be significant, as both retail and employment land would rely upon household growth within and adjoining the village. All sites across the district have been assessed as part of the SHELAA and Sustainability Appraisal that accompanies the Wealden Local Plan. The Sustainability Appraisal also considers the relative merits of settlements, particularly taking into account the relative impact upon environmental designations which includes, but is not limited to, the relative impacts of settlements in relation to Ashdown Forest SAC. In this regard, there are benefits to developing in this area compared to other settlements within the District.</p>
<p>b) the cost of, and scope of, developing outside the designated area, or meeting the need for it in some other way.</p>	<p>The High Weald AONB designation washes over the entirety of Wadhurst and extends a further 8km to the north of the settlement before it ends. As a result, no development can be located outside of the High Weald AONB and still specifically relate to Wadhurst. If development was located at the nearest sustainable location outside of the High Weald AONB (such as Tunbridge Wells), this would deliver development that would not necessarily benefit or relate in anyway to meeting the local housing needs of Wadhurst. In addition, whilst it is preferable to accommodate new housing development on Previously Developed Land (PDL) rather than greenfield land, it is not considered appropriate to deliver new housing solely through the use of PDL in Wadhurst. Indeed, Policy WLP 7 (Distribution of Homes) of the Wealden Local Plan confirms that a windfall allowance is supported within the development boundary of Wadhurst, which will reduce opportunities to deliver new housing development within the existing settlement in any case.</p>
<p>c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</p>	<p>The SHELAA site reference for the allocation (592/3330) has been considered through the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and has been described as having low visibility, moderate landscape sensitivity, very high landscape value and low landscape capacity. As noted above, it is considered that the development of the site would have the potential to erode some key landscape features of the High Weald AONB as summarised above, albeit that the allocation is visually well contained (hence the site is considered to have 'low visibility'). This would include the potential erosion of the field boundaries and their vegetation, mature trees and more significantly, Ancient Woodland and the public footpath through the site. Policy RUGA 8 (Allocation Land at Foxhole Farm) of the Wealden Local Plan states under criteria b), c), d) and f) to retain and upgrade the historic route way / Public Right of Way, the protection of Ancient Woodland and the provision of a suitable buffer, and the protection of boundary hedgerows and mature trees to improve their wildlife corridor, connectivity, ecological and screening functions. If the development</p>

NPPF Public Interest Test	Justification
	scheme follows the criteria in policy RUGA 8 (Allocation Land at Foxhole Farm) of the Wealden Local Plan, it is considered that there are opportunities to improve the landscape, and moreover, moderate any detrimental impacts upon the environment.

4.4 Wadhurst - Alternative Sites

4.42 The published SHELAA (August, 2018) does consider all the development sites put forward and considered for the Wealden Local Plan process and therefore considers all the potential development sites within or outside the settlements of Heathfield, Wadhurst and Mayfield that have allocations within the High Weald AONB. In addition, all such development sites have been considered within the accompanying Sustainability Appraisal Report (SA) for the new Wealden Local Plan that did consider under SA Objective 2⁽²⁰⁾ the potential landscape impacts of development upon the High Weald AONB (which in almost all cases would lead to a negative effect). Lastly, both the Wealden Landscape & Settlement Character Assessment (November, 2014) and Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) have either considered the areas in which the alternative sites are located from a landscape point of view, or in the case of the latter evidence base document, the individual SHELAA sites themselves, which includes their visibility, landscape sensitivity, landscape value and importantly, landscape capacity. These issues are summarised in the table below for the alternative SHELAA sites within, adjacent or close to the settlement boundary of Wadhurst.

4.43 As discussed within the SHELAA (August, 2018), there are a number of sites promoted for the SHELAA that are considered too small for the assessment and the SHELAA will only seek to include those housing sites that either over 0.25 hectares or are capable of accommodating 5 or more dwellings. For reference purposes, the sites that have been considered too small for assessment within the SHELAA (August, 2018) have been accounted for in the table below and have been concluded as 'site considered too small for assessment'. It should be noted that this does not preclude those sites from development in line with Policy WLP 7 (Distribution of Homes) under the windfall allowance, but due to their size, such sites will not be allocated within the Wealden Local Plan. Furthermore, a number of SHELAA sites have been granted planning permission by the local planning authority at the time of the assessment, but have yet to be built out. Such sites have not been assessed further (although the sites have been identified below) and are considered to be commitments in the context of the Wealden Local Plan. Lastly, it should be noted that only those SHELAA sites that relate to the settlement of Wadhurst have been considered in the context of new allocations within the Wealden Local Plan. Other smaller settlements within the Parish of Wadhurst have been considered within the settlement hierarchy in the Wealden Local Plan, but are considered to be 'unsustainable settlements' not capable of accommodating significant allocations for development⁽²¹⁾.

4.44 Following the issues outlined above, the table below presents all the alternative development sites that have been considered within the SHELAA (August, 2018) for the settlement of Wadhurst. This includes the SHELAA references and site addresses, a summary of the SHELAA in the context of the AONB for individual sites, a summary of the issues presented by the either Wealden Landscape and Settlement Character Assessment (November, 2014) and/or specifically through the Wealden Local Plan Sites

20 To conserve and enhance the District's countryside, landscape, historic environments, and cultural assets.

21 In the case of Wadhurst, a single site was assessed at Coulsey Wood that is categorised as 'residential settlement' in the settlement hierarchy of the Wealden Local Plan, which are defined as settlements with no accessibility and no or very limited facilities. The settlement is considered as an 'unsustainable settlement' that has no Core Area associated with it and is not expected to contribute towards housing development within the District.

- Landscape and Ecological Assessment (July, 2017), a summary of whether the site is considered to be 'major development' in the context of the paragraph 116 of the NPPF and an overall recommendation. As discussed above, the alternative SHELAA sites below are associated with the settlement of Wadhurst only.

Table 3 : Wadhurst Settlement Alternative Site Summary

SHELAA Reference	Site Address	SHELAA Summary (August, 2018)	Landscape Assessment Summary	Major Development in the Context of the NPPF (Paragraph 116)	Recommendation
590/3330	Land Adjacent 29 Snape View, Wadhurst	Site considered too small for assessment. The site also has planning permission at the time of the assessment.	N/A	N/A	Site considered too small for assessment. The site has now been granted planning permission.
611/3330	Meadowcroft, Pell Green, Wadhurst	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
938/3330	Land East of Osmers Hill, Wadhurst	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
397/3330	Land at Lower High Street, Wadhurst	Site has planning permission at the time of the assessment.	N/A	N/A	The site has now been granted planning permission.
119/3330	North side of Tapsells Lane, Wadhurst	The SHELAA confirms that this is a large site served off the existing highway network, but that development would appear	The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified	The SHELAA confirms that the site is comprised of at least 4.88 hectares (gross), or	The site is considered to be unsuitable for residential development in the

Development in the High Weald AONB

450/3330	Crest Farm, Pell Lane, Cousley	visually somewhat disconnected from the existing settlement of Wadhurst. It notes that the site would also be relatively isolated from the village centre and local services and facilities. In addition, the site is wholly located within the High Weald AONB and the site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) where development would have an unjustified impact on the character and appearance of the landscape. Therefore, the development of the site was considered 'not suitable' in the SHELAA.	the site as having a very low landscape capacity due to its very high sensitivity and very high landscape value. The assessment notes that the site's location within the High Weald AONB, coherent ancient landscape pattern and good condition gives the site a very high landscape value. The assessment notes that the western field is most sensitive as a result of its proximity to Ancient Woodland, it intact historic fields boundaries and sense of remoteness.	3 hectares (net) and given the scale of the site, it would likely result in major development in the context of paragraph 116 of the NPPF.	context of its impact upon the High Weald AONB.
		The SHELAA states that the site is prominent in the landscape and that housing development	The site was classified as being in a very high landscape sensitive location within the	The SHELAA confirms that the site is comprised of at least 1.65	The site is considered to be unsuitable for residential

	<p>Wood, Wadhurst</p>	<p>would impact detrimentally on the rural appearance and character of the countryside. The assessment also notes that the site is some distance from the principal village centre and from local services and facilities. Lastly, the assessment notes that because of its location on the south side of Pell Lane, development would appear out of keeping with the form of the settlement and would not be suitable location for the extension to the village. Given the above, the development of the site for housing was considered 'not suitable' in the SHELAA.</p>	<p>Wealden Landscape & Settlement Character Assessment - Supplementary Report (November, 2016) with a very high landscape value. It should be noted that landscape setting area 2 for Sparrow's Green and Durgates, in which the site is situated, is considered to have a very low landscape capacity as a result of very high landscape sensitivity and very high landscape value. It notes that the area is situated within the High Weald AONB, which contributes to its very high landscape value, whilst the wooded ghylls and stream corridors are highly sensitive landscape features and there is a strong strength of place throughout, resulting in very high landscape sensitivity.</p>	<p>hectares (net), which would deliver a moderate housing development in the context of Wadhurst. The site is also considered to have significant detrimental effect on the High Weald AONB as discussed in the SHELAA and as evidenced in the Wealden Landscape & Settlement Character Assessment - Supplementary Report (November, 2016).</p>	<p>development in the context of its impact upon the High Weald AONB.</p>
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486/3330	Land to the West of Herons Lea, Tapsells Lane	<p>The site is wholly located within the High Weald AONB and the site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment - Supplementary Report (November, 2016) and that development would have a unjustified impact on the character and appearance of the area. The SHELAA also states that the creation of a vehicular access at the site onto Tapsells Lane would be difficult and the developable area of the site would be reduced further due the mature trees and significant slopes on the site. Therefore, the development of the site was considered 'not suitable' in the SHELAA.</p>	<p>The site was classified as being in a very high landscape sensitive location within the Wealden Landscape & Settlement Character Assessment - Supplementary Report (November, 2016) with a very high landscape value. It should be noted that landscape setting area 6 for Sparrow's Green and Durgates, in which the site is situated, is considered to have a very low landscape capacity as a result of very high landscape sensitivity and very high landscape value. It notes that the area is situated within the High Weald AONB, which contributes to its very high landscape value. The landscape's distinctive sloping form and coherent pattern of irregular-shaped ancient pastoral fields are sensitive landscape features, contributing to the</p>	<p>The SHELAA confirms that the site is comprised of at least 0.36 hectares (gross), which would deliver a relatively modest housing site in the context of Wadhurst. However, the site is considered to have a significant detrimental effect on the High Weald AONB as discussed in the SHELAA and as evidenced in the Wealden Landscape & Settlement Character Assessment - Supplementary Report (November, 2016).</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.</p>
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585/3330	Land on corner of Blacksmith's Lane, Wadhurst	The SHELAA confirms that the site comprises a single field used for grazing located to the north east of Wadhurst that is wholly located within the High Weald AONB. The assessment confirms also that the site is isolated and remote from local services and facilities and that development would be unsuitable in this location and out of keeping with the generally rural character of the area. Therefore, the development of the site was considered 'not suitable' in the SHELAA.	area's very high landscape sensitivity.	The site was classified as being in a very high landscape sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a very high landscape value. It should be noted that landscape setting area 2 for Wadhurst, in which the site is situated, is considered to have a very low landscape capacity as a result of very high landscape sensitivity and very high landscape value. The assessment notes that the area is situated within the High Weald AONB, which contributes to its very high landscape value. In addition, the area has a very strong strength of place and landscape structure resulting from the pattern of small-scale	The SHELAA confirms that the site is comprised of at least 0.68 hectares (gross), which would deliver a relatively modest housing site in the context of Wadhurst. However, the site is considered to have a significant detrimental effect on the High Weald AONB and is isolated as is discussed in the SHELAA and as evidenced in the Wealden Landscape & Settlement Character Assessment (November, 2014).	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB and its isolated location.
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613/3330	Land at Marling House, Station Road, Wadhurst	The site is wholly located within the High Weald AONB and the site was classified as having high landscape sensitivity and high landscape value within the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) where it is considered that such development would have a unjustified impact on the character and appearance of the countryside. The assessment also notes that the site is isolated and remote from local services and facilities, and furthermore, the site as submitted cannot be provided with a suitable vehicular access to serve the housing development. Therefore, the	ancient pastoral fields and Ancient Woodlands; resulting in very high landscape sensitivity.	The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and high landscape value. The assessment notes that some degradation of condition or loss of ancient landscape features reduces the Site's landscape value, but this should be balanced against its location within the High Weald AONB and strong sense of remoteness/tranquillity giving the site a high landscape value overall.	The SHELAA confirms that the site is comprised of at least 0.6 hectares (net), which would deliver a relatively modest housing site in the context of Wadhurst. However, the site is considered to have a significant detrimental effect on the High Weald AONB and is isolated as is discussed in the SHELAA and as evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017).	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB, its isolated location and poor access arrangements.
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615/3330	Land at Puck Hill, Station Road, Wadhurst	development of the site was considered 'not suitable' in the SHELAA.	The SHELAA confirms that the site lies north-west of Durgates on the western side of Wadhurst, wholly within the High Weald AONB. It notes that the site was classified as having high landscape sensitivity and high landscape value within the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017), and moreover, housing development would be unsuitable in this location and out of keeping with the generally rural character and appearance of the countryside. The assessment also notes that the site is isolated and remote from local services and facilities, and furthermore, the site as submitted cannot be provided with a suitable	The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and high landscape value. The assessment notes that its location adjacent to the main road entering the settlement gives a more limited sense of remoteness/ tranquility and reduces the site's landscape value, but this should be balanced against its location within the High Weald AONB giving the site a high landscape value overall.	The SHELAA confirms that the site is comprised of at least 0.6 hectares (net), which would deliver a relatively modest housing site in the context of Wadhurst. However, the site is considered to have a significant detrimental effect on the High Weald AONB and is isolated as is discussed in the SHELAA and as evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017).	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB, its isolated location and poor access.
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Development in the High Weald AONB

790/3330	Land at Beechlands, Beech Hill, Wadhurst	vehicular access to serve the housing development. Therefore, the development of the site was considered 'not suitable' in the SHELAA.	The SHELAA confirms that the site comprises vacant land located wholly within the High Weald AONB. The site is considered to be isolated and remote from local services and facilities with the principal village some distance away. It is considered that housing development would be unsuitable in this location and out of keeping with the generally rural character and appearance of the countryside. In addition, the development of the site is considered to have an unjustified impact on the character and appearance of the attractive and high quality landscape which surrounds Wadhurst. Therefore, the	The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment - Supplementary Report (November, 2016) with a very high landscape value. It should be noted that landscape setting area 4 for Sparrow's Green and Durgates, in which the site is situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and very high landscape value. It notes that the area is situated within the High Weald AONB, which contributes to its very high landscape value. The assessment notes that	The SHELAA confirms that the site is comprised of at least 0.74 hectares (gross), which would deliver a relatively modest housing site in the context of Wadhurst. However, the site is considered to have a significant detrimental effect on the High Weald AONB and is isolated as is discussed in the SHELAA and as evidenced in the Wealden Landscape & Settlement Character Assessment - Supplementary	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB and its isolated location.
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901/3330	Land on the south side of Cousley Wood Road, Wadhurst	development of the site was considered 'not suitable' in the SHELAA.	medium-scale Ancient ghyll Woodland with small-scale ancient pastoral fields contributes to a feeling of enclosure and a very strong strength of place, resulting in high landscape sensitivity.	Report (November, 2016).	
	The site is wholly located within the High Weald AONB and the site was classified as having very high landscape sensitivity within the Wealden Landscape & Settlement Character Assessment (November, 2014) where it is considered that such development would have a unjustified impact on the character and appearance of the landscape. Although residential development is located to the north, north east and south west of the site, it does extensive views to open countryside to the south of the site. Given the above, the development of the site for	The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a very low landscape capacity due to its very high sensitivity and very high landscape value. The assessment notes that its location within the High Weald AONB, coherent historic landscape pattern and good condition gives the site a very high landscape value overall. There are no significant variations in landscape sensitivity within the site.	The SHELAA confirms that the site is comprised of at least 1.65 hectares (net), which would deliver a moderate housing development in the context of Wadhurst. The site is also considered to have significant detrimental effect on the High Weald AONB as discussed in the SHELAA and as evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017).		The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.

Development in the High Weald AONB

584/3330	Land adjacent to Jonas Drive, Durgates, Wadhurst	housing was considered 'not suitable' in the SHELAA. The SHELAA confirms that site slopes steeply downhill towards the north east with exposed sections from the centre of the site to this elevation. Given this constraint only the southern section of the site may be suitable for development subject to screening to the north, east and western boundaries to mitigate the impact of development on the wider landscape. It notes that the site is wholly within the High Weald AONB and therefore the development of the site would have to meet the requirements of paragraph 116 of the NPPF. With this caveat in place, the SHELAA states that this site is suitable for the development of housing.	The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its very high landscape sensitivity and high landscape value. The assessment notes that some degradation of landscape features which contribute to the coherent ancient landscape pattern reduces the site's landscape value, but this should be balanced against its location within the High Weald AONB and strong sense of remoteness/tranquillity giving the site a high landscape value overall. The assessment also notes that land to the south and east of the site are	The SHELAA confirms that the site is comprised of at least 1 hectare (net), which would deliver a moderate housing development in the context of Wadhurst (the SHELAA states that 30 dwellings would be the total capacity). Nevertheless, the site is considered to have very high landscape sensitivity as evidenced by the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and a number of mitigation measures would be required to lessen the impact upon the	The site is considered to be suitable for residential development in the context of the SHELAA and with the caveat that the site could be developed whilst meeting the requirements of paragraph 116 of the NPPF. However, it is considered that the other four allocated sites within/adjoining Wadhurst would have a lesser impact upon the High Weald AONB in landscape terms and could be appropriately mitigated. In
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			<p>most sensitive, with the eastern part of the site directly adjoining a small, fragmented Ancient Woodland and the southern part of the site being more visually sensitive owing to being located closer to the highest point of this sloping site.</p>	<p>High Weald AONB.</p>	<p>addition to this, its location relative to the centre is not as favourable as other locations.</p>
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4.5 Mayfield - Allocated Sites

Policy RUGA 17 - Allocation Land at Mayfield Cricket Club

4.45 The site is located on the south western edge of Mayfield with the A267 Mayfield bypass located to the north of the site and large detached residential properties being located to the west forming the cul-de-sac of Roselands Close. The site comprises of three separate sites in separate ownership totalling approximately 4.2 hectares and is defined on the Proposals Map as MAY1. The site is allocated for the development of up to 50 dwellings provided it meets the site specific requirements outlined in Policy RUGA 17 (Allocation Land at Mayfield Cricket Club) in the Wealden Local Plan. The site includes the cricket pitch and pavilion to the north, a large detached residential dwelling to the south which includes a garden, a single small paddock (northern section of SHELAA Site 827/3140) and a small fragmented Ancient Woodland. The site is highly visible in the landscape to the south, however it has limited visual impact on the northern parts of the site. The Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) identifies the site as having a moderate landscape capacity, although the southern part of the site is considered to have low landscape capacity (i.e. SHELAA Site 827/3140). It is therefore essential for any development to take into account the sensitivities of the southern section of the site surrounding the Ancient Woodland and provide suitable landscape mitigation. The allocation site is located outside the Conservation Area, which covers the majority of Mayfield.

4.46 In terms of the policy RUGA 17 (Allocation - Land at Mayfield Cricket Club), criteria e) confirms that that layout and design of the development shall have regard to its location within the High Weald AONB and shall be determined through a landscape and visual impact assessment taking into account the setting of the High Weald AONB. It notes that the design will require the sensitive layout of spaces, the provision of soft landscaping, the use of local materials and a consideration of the character of the area. Criteria c) and d) of policy RUGA 8 relate to the protection and enhancement of Ancient Woodland, boundary hedgerows and mature trees on the boundaries to the site.

Major Development Classification

4.47 Within the 'settlement hierarchy' that is contained in the Wealden Local Plan, the village of Mayfield is categorised as a 'Large Village - type 2' that are described as settlements which are accessible with very good local facilities but are relatively small compared to type 1 villages (i.e. Wadhurst and Forest Row). The range of retail outlets and businesses are more limited than larger villages, but they still have access to essential facilities and are therefore considered as 'sustainable settlements' within the Wealden Local Plan. As of the 2011 Census, the Parish of Mayfield had 1,608 households and this likely to be higher given the time elapsed between the Census and present. The allocation of Land at Mayfield Cricket Club equates to 50 (net) dwellings and would represent a modest increase to households in the Parish (the allocation equates to 3.11% of the total households in the Parish).

4.48 In terms of the spatial relationship between the allocation and the existing settlement, the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) stated that the site (see SHELAA references 783/3140 and 827/3140) were located adjacent to the existing urban edge of the settlement, which gives a limited sense of remoteness/tranquillity and reduces the site's landscape value, albeit that this is less pronounced within the southern SHELAA site (see reference 827/3140). Nevertheless, the allocation site is bounded by residential development to the west along Roselands Avenue and mature woodland to the north and east (the latter includes Ancient Woodland) as well as further residential development eastwards beyond the mature woodland to core of the settlement itself. The comprehensive development of the site would ensure that spatial relationship between the site and the remainder of the settlement would be stronger, although there would be long ranging views to the south west, albeit that sections of the eastern and southern fields are low lying and suitably buffered from the surrounding landscape. A strong landscape buffer along the southern boundary of the site, adjacent to the ancient woodland, would be required to ensure that the site has a more limited impact upon the High Weald AONB.

4.49 The Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) states that in relation to the southern SHELAA Site (see reference 827/3140) the site has low landscape capacity due to its high sensitivity and high landscape value. Its location adjacent to the existing urban edge gives a slightly more limited sense of remoteness/tranquillity and reduces the site's landscape value, but balanced against this is the location within the High Weald AONB and the coherent ancient landscape pattern and good condition, giving the site a high landscape value overall. The landscape assessment states in relation to the eastern SHELAA Site (see reference 783/3140) that the site has a high landscape capacity due to its low sensitivity and moderate landscape value. Its location adjacent to the existing urban edge gives a limited sense of remoteness/tranquillity and reduces the site's landscape value, but balanced against this is the location within the High Weald AONB giving the site a moderate landscape value overall. In this case, although there are differing levels of sensitivity for the overall site, it is considered that the Ancient Woodland, the area adjacent to the Ancient Woodland and the larger intact historic field further south is the most sensitive part of the site. The southern-most field is also semi-improved neutral grassland, a key yet increasingly rare feature of the High Weald AONB, which further increases the sensitivity of this part of the site. The assessment confirms that in terms of safeguarding important landscape and ecological features, that the retention of Ancient Woodland and the maintenance of a buffer to the Ancient Woodland are integral to the protection of the site and is a specific target within the High Weald AONB Management Plan. The protection of field boundaries and their vegetation and existing mature trees is also considered paramount to the protection of the landscape features within the site and those issues have been addressed through policy RUGA 17 (Allocation Land at Mayfield Cricket Club) of the Wealden Local Plan under criteria c), e) and f).

4.50 It is considered that a proposal of this scale (i.e. no more than 50 dwellings) in the context of Mayfield would normally be described as major development. In conclusion, it is considered that the scale of the proposed allocation in the context of Mayfield would be moderate. Despite the edge of settlement location, it is considered that the development

would still potentially erode the landscape character of a fringe part of Mayfield as summarised above, specifically in relation to Ancient Woodland, boundary hedgerows and mature trees and visibility into the southern part of the site. It is considered that Policy RUGA 17 (Allocation Land at Mayfield Cricket Club) of the Wealden Local Plan would mitigate those issues evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) and as such, the proposed allocation would not likely result in a significant detrimental impact on the High Weald AONB. An assessment against the public interest test criteria set out in the NPPF (March, 2012) and revised NPPF (July, 2018) is set out below.

NPPF Public Interest Test	Justification
a) the need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.	A sufficient supply of housing land is needed on both a district wide and local level to meet the housing requirements set out within Policy WLP 1 (Provision of Homes and Jobs) of the Wealden Local Plan and affordable housing particularly, where it is known that at least 10 households were 'in need' of affordable housing within the Mayfield settlement (see Housing Needs Survey Report - Wealden District: Settlements in Areas of Outstanding Natural Beauty August, 2016). Mayfield is described in the Wealden Local Plan 'settlement hierarchy' as a 'sustainable settlement' in the District and is therefore expected to meet its own housing needs where it is appropriate to do so in the context of the environmental constraints of the settlement, including the landscape impact of new residential development. The impact of not allocating land for housing development within/adjoining Mayfield would be significant, as both new and existing retail and employment uses would rely upon household growth within and adjoining the village. All sites across the district have been assessed as part of the SHELAA and Sustainability Appraisal that accompanies the Wealden Local Plan. The Sustainability Appraisal also considers the relative merits of settlements, particularly taking into account the relative impact upon environmental designations which includes, but is not limited to, the relative impacts of settlements in relation to Ashdown Forest SAC. In this regard, there are benefits to developing in this area compared to other settlements within the District.
b) the cost of, and scope of, developing outside the designated area, or meeting the need for it in some other way.	The High Weald AONB designation washes over the entirety of Mayfield and extends a further 9km to the south of the settlement before it ends. As a result, no development can be located outside of the High Weald AONB and still specifically relate to Mayfield. If development was located at the nearest sustainable location outside of the AONB (such as Horam), this would deliver development that would not necessarily benefit or relate in any way to meeting the local housing needs of Mayfield. In addition, whilst it is preferable to accommodate development on Previously Developed Land (PDL) rather than greenfield land, it is not considered appropriate to deliver new housing solely through the use of PDL in Mayfield. Indeed, Policy WLP 7 (Distribution of Homes) of the Wealden Local Plan confirms that a windfall allowance is supported within the development boundary of Mayfield, which will reduce opportunities to deliver new housing development within the existing settlement in any case. In this case, although there are differing levels of sensitivity for the overall site, it is considered that the Ancient Woodland, the area adjacent to the Ancient Woodland and the larger intact historic field further south is the most sensitive part of the site. The southern-most field is also semi-improved neutral grassland, a key yet increasingly rare feature of the High Weald AONB, which further increases the sensitivity of this part of the site.
c) any detrimental effect on the environment, the landscape and	The SHELAA site references for the allocation (827/3140 and 783/3140) have been considered separately through the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) with the first site (Ranmoor/Criss Cross, Wellbrook, Mayfield) considered to have moderate visibility, low landscape sensitivity,

NPPF Public Interest Test	Justification
<p>recreational opportunities, and the extent to which that could be moderated.</p>	<p>moderate landscape value and high landscape capacity and the second site (Roseland's Close, Roseland's Avenue, Mayfield) considered to have moderate visibility, high landscape sensitivity, landscape value and a low landscape capacity. In this case, although there are differing levels of sensitivity for the overall site, it is considered that the Ancient Woodland, the area adjacent to the Ancient Woodland and the larger intact historic field further south is the most sensitive part of the site. The southern-most field is also semi-improved neutral grassland, a key yet increasingly rare feature of the High Weald AONB, which further increases the sensitivity of this part of the site. Policy RUGA 17 (Allocation Land at Mayfield Cricket Club) of the Wealden Local Plan confirms under criteria c) that on and off-site woodland, including Ancient Woodland must be protected, retained, enhanced and managed, including the provision of a suitable buffer that contributes positively and enhances the green infrastructure network. Criteria f) of policy RUGA 17 also confirms that hedgerows and mature trees along the northern, eastern and southern boundary must be protected, retained, enhanced and appropriately buffered and managed, and that these features must be incorporated into the overall design of the development to reinforce historic character, landscape characteristics and to protect and improve their existing wildlife corridor, connectivity, ecological and screening functions. If the development scheme follows the criteria in policy RUGA 17 (Allocation Land at Mayfield Cricket Club) of the Wealden Local Plan, it is considered that there are opportunities to improve the landscape, and moreover, moderate any detrimental effect upon the environment.</p>

4.6 Mayfield - Alternative Sites

4.51 The published SHELAA (August, 2018) does consider all the development sites put forward and considered for the Wealden Local Plan process and therefore considers all the potential development sites within or outside the settlements of Heathfield, Wadhurst and Mayfield that have allocations within the High Weald AONB. In addition, all such development sites have been considered within the accompanying Sustainability Appraisal (SA) for the new Wealden Local Plan that did consider under SA Objective 2⁽²²⁾ the potential landscape impacts of development upon the High Weald AONB (which in almost all cases would lead to a negative effect). Lastly, both the Wealden Landscape & Settlement Character Assessment (November, 2014) and Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) have either considered the areas in which the alternative sites are located from a landscape point of view, or in the case of the latter evidence base document, the individual SHELAA sites themselves, which includes their visibility, landscape sensitivity, landscape value and importantly, landscape capacity. These issues are summarised in the table below for the alternative SHELAA sites within, adjacent or close to the settlement boundary of Mayfield.

4.52 As discussed within the SHELAA (August, 2018), there are a number of sites promoted for the SHELAA that are considered too small for the assessment and the SHELAA will only seek to include those housing sites that are either over 0.25 hectares or are capable of accommodating 5 or more dwellings. For reference purposes, the sites that have been considered too small for assessment within the SHELAA (August, 2018) have been accounted for in the table below and have been concluded as 'site considered too small for assessment'. It should be noted that this does not preclude those sites from development in line with Policy WLP 7 (Distribution of Homes) under the windfall allowance, but due to their size, such sites will not be allocated within the Wealden Local Plan. Furthermore, a number of SHELAA sites have been granted planning permission by the local planning authority at the time of the assessment, but have yet to be built out. Such sites have not been assessed further (although the sites have been identified below) and are considered to be commitments in the context of the Wealden Local Plan. Lastly, it should be noted that only those SHELAA sites that relate to the settlement of Mayfield have been considered in the context of new allocations within the Wealden Local Plan. Other smaller settlements within the Parish of Mayfield and Five Ashes have been considered within the settlement hierarchy in the Wealden Local Plan, but are considered to be 'unsustainable settlements' not capable of accommodating significant allocations for development⁽²³⁾.

4.53 Following the issues outlined above, the table below presents all the alternative development sites that have been considered within the SHELAA (August, 2018) for the settlement of Mayfield. This includes the SHELAA references and site addresses, a summary of the SHELAA in the context of the AONB for individual sites, a summary of

22 To conserve and enhance the District's countryside, landscape, historic environments, and cultural assets.

23 In the case of the Mayfield and Five Ashes Parish, a small number of sites were assessed within or near to the settlement of Five Ashes that is categorised as 'local settlement' in the settlement hierarchy of the Wealden Local Plan, which are defined as settlements with accessibility by public transport, with local to very limited facilities. The Five Ashes settlement is considered to be an 'unsustainable settlement' that may be capable of accommodating residential development in line with policies on 'Core Areas' contained within the Wealden Local Plan and Policy WLP 7 (Distribution of Homes), but not through formal allocations within the Wealden Local Plan.

the issues presented by the either Wealden Landscape and Settlement Character Assessment (November, 2014) and/or specifically through the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017), a summary of whether the site is considered to be 'major development' in the context of the paragraph 116 of the NPPF and an overall recommendation. As discussed above, the alternative SHELAA sites below are associated with the settlement of Mayfield only.

Table 4 : Mayfield Settlement Alternative Site Summary

SHELAA Reference	Site Address	SHELAA Summary (August, 2018)	Landscape Assessment Summary	Major Development in the Context of the NPPF (Paragraph 116)	Recommendation
826/3140	Land at North Yard Industrial Estate, Pennybridge Lane, Mayfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
874/3140	Knowle, Newick Lane, Mayfield	Site considered too small for assessment.	N/A	N/A	Site considered too small for assessment.
025/1630	The Walled Garden, Trulls Hatch, Argos Hill	Site has planning permission at the time of the assessment.	N/A	N/A	The site has now been granted planning permission.
133/3140	Land on North side of A267, adjacent to Wellbrook Cottage in Wellbrook Hill (Land at Wellbrook Hill)	The site is wholly located within the High Weald AONB and the site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should	The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should	The SHELAA confirms that the site is comprised of at least 1.74 hectares (gross), which would deliver a significant housing	The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB and

		<p>(November, 2014). The SHELAA states that this site is isolated and rural, detached from the settlement of Mayfield and is remote from local services and facilities, and visually and functionally separated from any nearby settlement. The SHELAA concluded that housing development would be unsustainable in this location, and appear out of keeping with the attractive rural character and appearance of the high quality landscape of this area. Therefore, the development of the site was considered 'not suitable' in the SHELAA.</p>	<p>be noted that landscape setting area 4 for Mayfield, in which the site is situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and high landscape value. It notes that the area is situated within the High Weald AONB, which results in its high landscape value, whilst the stream corridors, lined with linear tracts of Ancient Woodland are key sensitive landscape features that contribute to its high landscape sensitivity.</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its moderate sensitivity</p>	<p>The SHELAA confirms that the site is comprised of at least 0.16 hectares (gross), which would deliver a relatively modest housing</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.</p>
<p>511/3140</p>	<p>Land adjacent to South Street Car Park, Mayfield</p>	<p>The site is wholly located within the High Weald AONB and the site was classified as being in a highly sensitive location within the Wealden Local Plan Sites - Landscape and Ecological Assessment</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its moderate sensitivity</p>	<p>The SHELAA confirms that the site is comprised of at least 0.16 hectares (gross), which would deliver a relatively modest housing</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.</p>	

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		<p>(July, 2017). The SHELAA confirms that the site was allocated for affordable housing in the Non Statutory Wealden Local Plan (2005). The site has been reappraised and it is noted that the development of the site would involve major engineering operations to obtain access on what is an exposed location on the southern slopes of the village, which is located in the High Weald AONB and also in the Mayfield Conservation Area. Therefore, the development of the site was considered 'not suitable' in the SHELAA.</p>	<p>and very high landscape value. It notes that the site is generally visually contained in the north by the surrounding built up area, but significantly exposed towards the south. The assessment also confirms that sites prominent position within the High Weald AONB gives the site a very high landscape value and that there are no significant variations in landscape sensitivity within the site.</p>	<p>site in the context of Mayfield. However, the site is considered to have a significant detrimental effect on the High Weald AONB as discussed in the SHELAA and as evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017).</p>	
606/3140	Land at West Street, Mayfield	<p>The site is wholly located within the High Weald AONB and the site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014). It notes</p>	<p>The site was also considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low landscape capacity due to its high sensitivity and high</p>	<p>The SHELAA confirms that the site is comprised of at least 1.60 hectares (gross), which would deliver a significant housing development in the</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.</p>

		<p>that the site is part of the exposed southern slope to the village, where there are distant views into (and back from) the AONB. The existing built form in the village runs west - east along the ridge just below the High Street. It notes that development here would puncture that, allowing development to project southwards below the ridge from Mayfield at the significant cost of the AONB. It was therefore concluded that development would be out of keeping with the high quality landscape of this area. Therefore, the development of the site was considered 'not suitable' in the SHELAA.</p>	<p>landscape value. The assessment states that the sites location adjacent to an existing urban edge gives a slightly more limited sense of remoteness/tranquillity and reduces the site's value, but this should be balanced against its location within the High Weald AONB giving the site a high landscape value overall. The assessment notes that the land to the south east of the site is the most sensitive as this area directly abuts a small fragmented Ancient Woodland which is highly sensitive.</p>	<p>context of Mayfield. The site is also considered to have significant detrimental effect on the High Weald AONB as discussed in the SHELAA and as evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017).</p>	
657/3140	Land to the south of Fir Toll Road, Fairmeadow Farm, Mayfield	<p>The SHELAA states that the site is wholly within the High Weald AONB and that development would have an unjustified impact on the character and appearance</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low</p>	<p>The SHELAA confirms that the site is comprised of at least 1.33 hectares (gross), which would</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact</p>

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		<p>of the attractive and high quality landscape which surrounds Mayfield. It also considers that the site is remote from village services and facilities and the existing A267 road severs the site from the village and would be a significant functional and visual barrier to creating a sustainable village extension in this location. Given the above, the development of the site for housing was considered 'not suitable' in the SHELAA.</p>	<p>landscape capacity due to its high sensitivity and high landscape value. The assessment states that the sites location adjacent to an existing urban edge gives a slightly more limited sense of remoteness/tranquillity and reduces the site's value, but this should be balanced against its location within the High Weald AONB giving the site a high landscape value overall. The assessment notes that the part of the site adjacent to the Ancient Woodland is the most sensitive and that all Ancient Woodland is sensitive as a result of the species and heritage assets it supports.</p>	<p>deliver a moderate housing development in the context of Mayfield. The site is also considered to have significant detrimental effect on the High Weald AONB as discussed in the SHELAA and as evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017).</p>	<p>upon the High Weald AONB and severance.</p>
<p>894/3140</p>	<p>Railway Paddock, Tunbridge Wells Road, Mayfield</p>	<p>The site is wholly located within the High Weald AONB and the site was classified as being in a highly sensitive location within the Wealden</p>	<p>The site was considered in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017) that classified the site as having a low</p>	<p>The SHELAA confirms that the site is comprised of at least 0.7 hectares (gross), which would</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact</p>

		<p>Landscape & Settlement Character Assessment (November, 2014) where it is considered that development would have an unjustified impact on the character and appearance of the landscape. The SHELAA notes also that despite the sites close proximity to the A267, the site is in an isolated location away from existing services and facilities. Given the above, the development of the site for housing was considered 'not suitable' in the SHELAA.</p>	<p>landscape capacity due to its high sensitivity and very high landscape value. It notes that its location within the High Weald AONB and coherent historic landscape pattern and good condition gives the site a very high landscape value. The assessment notes that the land to the north east and south east of the site are the most sensitive as these areas lie adjacent to Ancient Woodland that is highly sensitive.</p>	<p>deliver a relatively modest housing site in the context of Mayfield. However, the site is considered to have a significant detrimental effect on the High Weald AONB as discussed in the SHELAA and as evidenced in the Wealden Local Plan Sites - Landscape and Ecological Assessment (July, 2017).</p>	<p>upon the High Weald AONB.</p>
<p>915/3140</p>	<p>Land rear of 'Wheelwrights', Fletching Street, Mayfield</p>	<p>The SHELAA confirms that the site comprises of several small fields located behind residential development along Fletching Street to the south east of Mayfield. This is a sloping site which is wholly within the High Weald AONB which abuts</p>	<p>The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should be noted that landscape setting area 2 for Mayfield,</p>	<p>The SHELAA confirms that the site is comprised of at least 5.88 hectares (gross) and given the scale of the site, it would likely result in major development in the context of</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.</p>

Development in the High Weald AONB

		<p>a Local Conservation Site. It notes that the land here forms part of the exposed southern slope to the village, where there are distant views into (and back from) the AONB, albeit that in parts these views are filtered by trees and copses. In addition, the site is in an elevated position with long panoramic views of the High Weald to the south and south east. It is therefore considered that development would be out of keeping with the high quality landscape of this area and was therefore concluded to 'unsuitable' site for housing development within the SHELAA.</p>	<p>in which the site is situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and high landscape value. It notes that the area is situated within the High Weald AONB, which results in its high landscape value, whilst the strength of place is strong as a result of the intricate patchwork of small-scale ancient fields and sloping landform, which contributes to its high landscape sensitivity.</p>	<p>paragraph 116 of the NPPF.</p>	
<p>932/3140</p>	<p>Land at Field End, Argos Hill, Mayfield</p>	<p>The site is wholly located within the High Weald AONB and the site was classified as being in a highly sensitive location within the Wealden</p>	<p>The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November,</p>	<p>The SHELAA confirms that the site is comprised of at least 2.2 hectares (gross), which would</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact</p>

		<p>Landscape & Settlement Character Assessment (November, 2014) where it is considered that development would have an unjustified impact on the character and appearance of the landscape. The SHELAA also notes that the site has Ancient Woodland on and adjacent to it, and moreover, that the land is a remote and unsuitable location where there is no option to access services other than by motor vehicle. Given the above, the development of the site for housing was considered 'not suitable' in the SHELAA.</p>	<p>2014) with a high landscape value. It should be noted that landscape setting area 4 for Mayfield, in which the site is situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and high landscape value. It notes that the area is situated within the High Weald AONB, which results in its high landscape value, whilst the stream corridors, lined with linear tracts of Ancient Woodland are key sensitive landscape features that contribute to its high landscape sensitivity.</p>	<p>deliver a significant housing development in the context of Mayfield. The site is also considered to have significant detrimental effect on the High Weald AONB as discussed in the SHELAA and as evidenced in the Wealden Landscape & Settlement Character Assessment (November, 2014).</p>	<p>upon the High Weald AONB and its isolated location.</p>
<p>951/3140</p>	<p>Land situated between Rothermead, Roselands and Berkely Road on Wellbrook Hill, Mayfield</p>	<p>The site is wholly located within the High Weald AONB and the site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should</p>	<p>The site was classified as being in a highly sensitive location within the Wealden Landscape & Settlement Character Assessment (November, 2014) with a high landscape value. It should</p>	<p>The SHELAA confirms that the site is comprised of at least 0.81 hectares (gross), which would deliver a relatively modest housing</p>	<p>The site is considered to be unsuitable for residential development in the context of its impact upon the High Weald AONB.</p>

Development in the High Weald AONB

		<p>(November, 2014) where it is considered that development would have an unjustified impact on the character and appearance of the attractive and high quality landscape which surrounds Mayfield. It also notes housing development would be unsuitable in this location and out of keeping with the generally rural character and appearance of the countryside. Given the above, the development of the site for housing was considered 'not suitable' in the SHELAA.</p>	<p>be noted that landscape setting area 3 for Mayfield, in which the site is situated, is considered to have a low landscape capacity as a result of high landscape sensitivity and high landscape value. It notes that the area is situated within the High Weald AONB, which results in its high landscape value, whilst the strength of place is very strong as a result of the strong pattern of linear Ancient Woodlands and pastoral fields. In addition, it is considered that the linear Ancient Woodlands and a network of rural lanes contribute to the high landscape sensitivity of this setting area of Mayfield.</p>	<p>site in the context of Mayfield. However, the site is considered to have a significant detrimental effect on the High Weald AONB as discussed in the SHELAA and as evidenced in the Wealden Landscape & Settlement Character Assessment (November, 2014).</p>	
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5 Overall Conclusions and Recommendations

5.1 This assessment has been undertaken in the context of preparing a new Local Plan for the Wealden District, where work on Objectively Assessed Needs for housing and economic development has demonstrated that there is a substantial housing need across the Wealden District that includes a number of 'sustainable settlements' within the High Weald AONB, as described under the settlement hierarchy for the Wealden Local Plan. The overall spatial strategy for the Wealden Local Plan concluded that a small number of housing sites are necessary to be included within the Wealden Local Plan to ensure that the high demand for housing in 'sustainable settlements' within the High Weald AONB are met where it is appropriate to do so, taking into account the landscape constraints and potential remediation where this is available. It gives great weight to conserving the landscape and scenic beauty of the High Weald AONB, adopting a landscape capacity approach to identifying opportunities for growth in the most sustainable locations within the AONB that are not significantly constrained by their proximity to the Ashdown Forest SAC and SPA in the north west part of the District (i.e. Crowborough and Forest Row).

5.2 The following sites have been assessed in the context of the exceptions test for AONB development.

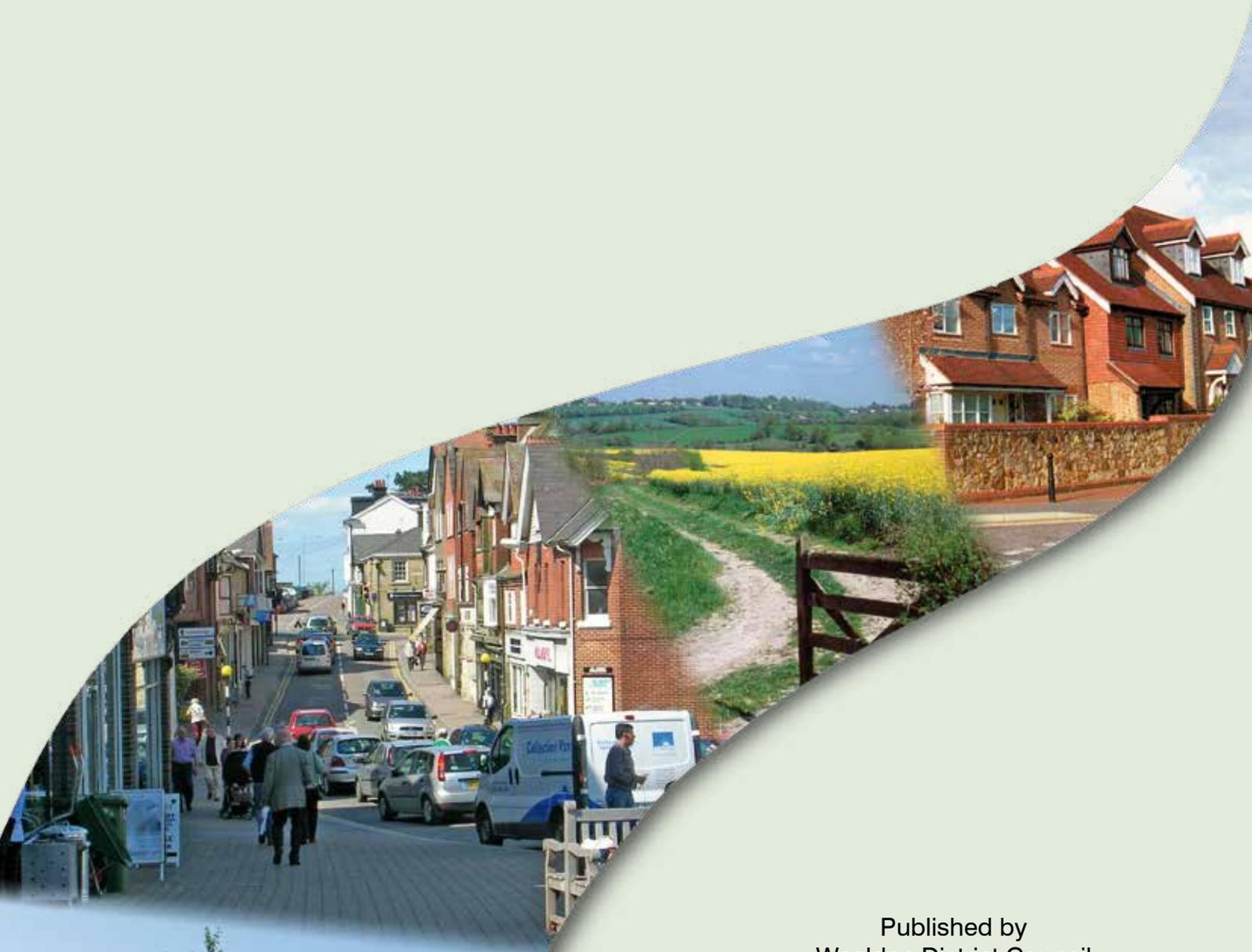
- Policy RUGA 1 - Land South of Burwash Road (30 net dwellings)
- Policy RUGA 2 - Land South West of Ghyll Road (103 net dwelling)
- Policy RUGA 5 - Land at Windmill House (20 net dwellings)
- Policy RUGA 6 - Land at High Street (10 net dwellings)
- Policy RUGA 7 - Land East of Old Station (21 net dwellings)
- Policy RUGA 8 - Land at Foxhole Farm (40 net dwellings)
- Policy RUGA 17 - Land at Mayfield Cricket Club (50 net dwellings)

5.3 Although on a precautionary basis, the following sites that includes Policy RUGA 1 (Land South of Burwash Road), Policy RUGA 5 (Land at Windmill House), Policy RUGA 6 (Land at High Street), Policy RUGA 7 (Land East of Old Station) and Policy RUGA 8 (Land at Foxhole Farm) have been subject to the exceptions test, where it is considered that they do not constitute major development and can therefore proceed on that basis.

5.4 However, the following sites that includes Policy RUGA 2 (Land South West of Ghyll Road) and Policy RUGA 17 (Land at Mayfield Cricket Club) are considered to be moderate growth in the context of the settlement associated with the development and therefore, the exceptions test are more appropriate for these two sites.

5.5 Having considered the need to meet the OAN, as well as area specific affordable housing needs, it is considered that development within these areas is justified. Consideration has been given to neighbouring authorities and it is not considered that other local authorities can meet the need for housing within the Wealden District AONB, taking into account their respective AONB/Greenbelt designations and land availability constraints. Furthermore, additional development will help sustain the local high streets, which as outlined in the Town Centre and Retail Study (December, 2016) and the Wealden Local Plan are defined under Policy RUGA 4 (Heathfield Primary Shopping Area), Policy

RUGA 9 (Wadhurst Primary Shopping Area) and Policy RUGA 18 (Mayfield Primary Shopping Area), as well as the local economy within each settlement. These sites have been subject to the consideration of alternative sites and are considered to be the most appropriate option that can be mitigated within these AONB areas.



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