

Wealden
District Council

Spatial Strategy Topic Paper

February 2026

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1. Introduction

1.1 The purpose of this document is to present the policy background, research and findings that have been considered in drafting the spatial strategy for the 'Focused' Local Plan for Wealden District at the Regulation 18 stage[1]. This topic paper explains the spatial strategy set out in the 'Focused' draft Local Plan and highlights national planning policy and guidance relevant to this, as well as the Council's own local evidence base that has informed the approach taken. It sets out the aims of the spatial strategy and the other options that have been considered for the emerging local plan, including within the Sustainability Appraisal (SA)[2].

1.2 This topic paper supports an additional stage in the preparation of the draft Local Plan, which is known as the 'Focused' Regulation 18 Draft Local Plan stage. The 'Focused' Regulation 18 Draft Local Plan concentrates primarily on the spatial strategy and associated policies, site allocation policies, as well as updates to the affordable housing policy, Gypsy and Traveller development site criteria policy, Sustainable Drainage (SuDS) policy and a new policy on Coastal Change Management Areas (CCMAs). It also provides further options for potential site allocations, particularly for housing, employment and Gypsy, Traveller and Travelling Showpeople development.

1.3 This topic paper will be revised and updated at the next stage in the preparation of the emerging local plan, before it's submission to the Planning Inspectorate (PINs) following the Regulation 19 stage for its Examination in Public (EIP) process. This updated Spatial Strategy Topic Paper will consider any changes to national planning policy at that time, any updates to the Council's evidence base, as well as any new sites submitted through the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) process.

2. Background

National Policy Context

2.1 The Local Plan is a long-term strategic planning document, which sets out the spatial vision, strategic objectives, and the overarching development strategy for an area and establishes the planning policy framework

[1] Draft 'Focused' Wealden Local Plan (Regulation 18), February 2026

[2] Wealden District Council Regulation 18(2) Sustainability Appraisal (SA), January 2026

necessary to deliver them. Planning applications are assessed against the policies within a Local Plan.

2.2 The NPPF[3] requires policies to be underpinned by robust, relevant and up to date evidence to support and justify policies at a local level. We have undertaken several studies covering a range of topic areas (housing, town centres, economy etc.) and we have referred to these, as relevant, in the draft plan. For certain planning topic areas, our evidence base work is ongoing and where this is the case, we have made this clear within the draft Local Plan. As we refine the plan for the next stage, certain evidence bases may also need to be updated to account for baseline information changes such as forthcoming national policy / legislative changes. Any of these areas could affect the way we need to collect our evidence and consider our evidence. We will progress this work at the right time to ensure that our evidence is robust to support our policies in the final iteration of the Local Plan.

2.3 The NPPF published in December 2024 has made several significant changes to national planning policy that were not anticipated at the time of the consultation of the draft Wealden Local Plan (Regulation 18) in March 2024[4]. This included changes to the 'standard methodology' for housing need, which meant that the housing needs figure of 1,200 dwellings per annum (dpa) cited in the draft Wealden Local Plan (Regulation 18) in March 2024 has increased to 1,457 dpa. There has also been a material change to assessing the transport implications of Local Plans, moving away from the 'predict and provide' model to a 'vison-led approach' to transport assessments. Under the previous version of the NPPF, the draft Local Plan (Regulation 18) in March 2024 noted that a key constraint to new development was the potential highway impact, particularly around the A22 and A26 corridor. The new vision-led approach will require further focussed transport evidence to support further iterations of the Plan. Further guidance on this issue was expected shortly after the NPPF was published, but this has not been forthcoming.

Progress of the Wealden Local Plan

2.4 The Council carried out two formal stages of consultation with communities, partner organisations and stakeholders on a range of important topic areas

[3] National Planning Policy Framework (NPPF), December 2024

[4] Wealden District Council Draft Local Plan (Regulation 18), March 2024

as to how the district should address the issues and challenges that it faces, accommodate growth and help us define a vision for our district.

2.5 Given the changes described to national planning policy and its potential impacts locally, it was clear that a further 'Focused' Draft (Regulation 18) Local Plan is required that specifically concentrates on the spatial strategy, development sites and other interrelated topics (i.e. housing and economy policies). This will address those changes to the revised NPPF and respondent comments previously on the spatial strategy. Therefore, a further 'focused' Regulation 18 version of the Local Plan has been developed to reconsult on those elements.

3. Spatial Strategy

Previous consultations on the Spatial Strategy

3.1 The first stage of the Council's local plan process was the publication of its 'Direction of Travel' document[5] that was consulted upon between 23 November 2020 and 18 January 2021. The consultation document set out four high-level growth options and invited comments on these:

- Option 1 - Focused Growth including Large Extensions to Existing Sustainable Settlements;
- Option 2 - Semi-Dispersed Growth to Existing Sustainable Settlements and Larger Villages;
- Option 3 - Dispersed Growth; and
- Option 4 - New Settlement(s) Growth.

3.2 Guided by information from national planning policy, local planning policy, consultation, evidence base documents and other guidance, the Council developed further potential spatial options for consideration in the Draft Local Plan (Regulation 18), which was consulted upon between 15 March and 10 May 2024:

A. To maximise growth in all locations within the district to meet the Council's housing and employment needs requirement;
B. To focus growth in and around all sustainable settlements (as defined in the Sustainable Settlement Study (SSS)[6]), and to the edge of major

[5] Wealden District Council 'Direction of Travel' Document (November 2020)

[6] Wealden District Council Sustainable Settlement Study (SSS), March 2024

towns that lie adjacent to the district (i.e. Eastbourne and Royal Tunbridge Wells);

C. To focus growth outside of the High Weald National Landscape, within and around sustainable settlements in the Low Weald (i.e. Uckfield, Hailsham, Polegate and Willingdon and other villages);

D. To focus growth on the delivery of new strategic extensions at existing sustainable settlements. Continue to support growth through windfalls at those settlements;

E. To maximise growth in all locations within the district to meet the Council's housing and employment needs requirement and to meet a small proportion of Eastbourne's unmet housing need;

F. To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the district (i.e. Eastbourne and Royal Tunbridge Wells), with limited employment growth; and

G. Combined Option of Spatial Options B and D;

3.3 Option F was considered to provide the most sustainable spatial strategy at the Draft Local Plan (Regulation 18) stage in March 2024 for the district and provides for a range of sites to be delivered primarily at our most sustainable settlements, although this option would still allow for some development in rural villages (including affordable housing). It would deliver housing at scale and would also seek to deliver the majority of development within the Low Weald, away from the High Weald National Landscape in line with national planning policy on this matter.

3.4 The following bullet points provide a summary of the common themes raised from the consultation in relation to the preferred option in the draft Wealden Local Plan (Regulation 18) presented in March 2024:

- Respondents stated that the draft Plan fails to take account of Wealden being a rural district with national landscape constraints, lack of infrastructure, and poor transport links;
- Respondents stated that the spatial strategy needs more consideration of regional structure and character, towns outside of the district, and changes across the district;
- It was stated that the spatial strategy fails to take account of out commuting that takes place;
- That the proposed growth has a significant effect on environmentally constrained areas and fails to adequately align with the NPPF on these issues;

- Some respondents stated that infrastructure should be in place before growth takes place;
- It was stated that the policy should include geographical elements, to focus development in certain areas and account for opportunities and constraints across the district;
- There was support for the approach to deliver homes and employment in line with the relative sustainability of settlements;
- Some stated that growth options still place over reliance on use of the private car, due to poor connectivity, and 20-minute neighbourhood requires further consideration;
- There was concern that the policy is overly restrictive and does not allow for settlements to grow, including in lower tier rural areas. The draft Plan should reintroduce small scale growth alongside and adjacent to existing villages;
- There were concerns in term of inconsistencies in some elements of Plan, and between Plan/Policies and the Sustainability Appraisal (SA)/Habitats Regulation Assessment (HRA) at that time;
- Specific comments were made by bodies relevant to the areas protected. For example, the High Weald National Landscape Unit raised some concerns specifically in relation to the proposed extension of development boundaries at Cross-in-Hand, Groombridge, Hartfield and Heathfield. Friends of the South Downs noted that development boundaries maintain the strategic gap between Polegate/Stone Cross and Hailsham but also note there is a lack of consideration for growth near, but outside of Eastbourne. Conservators of the Ashdown Forest raised concern at the lack of context to the exclusion zone around the Ashdown Forest, seeking also an exclusion zone around Pevensey Levels SAC and Ramsar Site.
- Varying responses from Parish/Town Councils. Some supported the draft spatial strategy and development boundaries as proposed, and some sought reductions/changes to certain areas and detailed settlement proposals.
- A significant number of representations were submitted in relation to specific settlements/sites within the Plan, seeking reconsideration of the options proposed.

3.5 Eight statutory consultees provided comments:

- East Sussex County Council (ESCC) were supportive of the draft spatial strategy in principle, but state that the inclusion of Willingdon Chord should be removed as there is no plan to reinstate it;

- ESCC also suggested a number of amendments to the supporting text to the policy including reference to the draft East Sussex Local Transport Plan (LTP) at that stage[7];
- National Highways have stated that the draft Plan does not fully incorporate promoting development in sustainable locations near existing communities and public transport, as well as utilising the 20-minute neighbourhood concept;
- Natural England are largely supportive of the draft spatial strategy and support the approach to limit growth in those settlements located within or within the setting of the High Weald National Landscape;
- Natural England also suggested that consideration be given as to whether any allocation would constitute 'major development' within the High Weald Area of Outstanding Natural Beauty (AONB) and reference to the Green Infrastructure Standard alongside the 20-minute neighbourhood would be welcomed. There were also a number of other minor amendments to supporting text suggested;
- Both Southern Water and Sports England were supportive of this draft spatial strategy;
- Eastbourne Borough Council (EBC) accept the sustainability credentials of focusing development on edge of conurbations such as Eastbourne but does have concerns over how the impact of such approach on infrastructure will be mitigated;
- The South Downs National Park Authority (SDNPA) support the draft spatial strategy but have stated that the existing settlement pattern is not harmful to the National Park, but challenges can occur when planning for future development. It is noted that specific reference should be made to the duty to seek to further the purposes of the National Park;
- Tunbridge Wells Borough Council (TWBC) does not support the draft spatial strategy and notes that any directed growth on the edge of the main urban settlement or borough boundary may cause an increase of pressure on the services, facilities, and infrastructure which will need to be considered; and
- TWBC also objected to the draft site allocations adjacent to the boundary with Tunbridge Wells.

[7] This now forms the Local Transport Plan 4 that was adopted on 8 October 2024 by ESCC.

Further options testing

3.6 Following the publication and consultation of the draft Wealden Local Plan (Regulation 18) in March 2024, a significant update to the NPPF around the provision of new homes came into force. We have considered those changes to the NPPF (summarised below) and its impact on both policy SS1 (Spatial Strategy for Wealden) and policy SS2 (Provision of Homes). The issues and actions are presented below:

1. A new 'standard method' for assessing housing need was introduced in the NPPF (December 2024) using both local housing stock figures and the median affordability ratios. In Wealden District, the housing stock has grown by around 10.5% in the last ten years and we have the highest median affordability ratio in East Sussex. As a result, the local housing need figure has significantly increased from 1,200 dpa at the time of the publication of the draft Wealden Local Plan (Regulation 18) in March 2024, to 1,457 dpa at the time of publication of this 'focused' draft Wealden Local Plan (Regulation 18) in February 2026.
2. Additionally mandatory housing targets were reintroduced for plan-making purposes, replacing the 'advisory' approach and removing the reference to 'exceptional circumstances' in which the use of alternative approaches to assessing housing need may be appropriate.
3. Due to the above changes, the Council sought an update to its Local Housing Needs Assessment (LHNA), which was last published in 2021. The conclusions of the LHNA Update[8], published in January 2026, on both general and specialist housing need, is to be considered further at the Regulation 19 stage[9].
4. In addition, the Council has now published its update to the Employment and Economic Study for Eastbourne and Wealden (January 2026)[10] that has considered the updated Plan period from 2025 to 2042, including a reassessment of the Functional Economic Market Area (FEMA) for Wealden, as well as the office floorspace requirements, and the industrial and warehouse floorspace requirements.

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[8] Wealden Local Housing Needs Assessment (January 2026)

[9] Except for amendments to the affordable housing policy that have been considered as part of the 'Focused' Draft Wealden Local Plan (February 2026).

[10] Employment and Economic Study (Update) for Eastbourne Borough Council and Wealden District Council (January 2026)

3.7 The issues above prompted the Council to carry out further site assessment work and to test both the spatial strategy options and other available sites to meet a greater proportion of local housing and employment need.

3.8 With the objective to identify all reasonable site alternatives to develop and assess spatial strategy reasonable alternatives, the Council engaged in a comprehensive review of all identified SHELAA sites. In assessing reasonable alternatives, the Council had to have regard to the following criteria:

- Whether the reasonable alternative is considered to be consistent with national planning legislation, policy and guidance;
- Whether the reasonable alternative is considered to be consistent with emerging Local Plan policies, as well as the Council's local evidence base. This also includes whether the reasonable alternative addresses other objectives of the corporate plan, the climate emergency plan etc.;
- Whether the reasonable alternative is deliverable over the plan period and what the impact would be of implementing such a spatial strategy in the district; and
- A summary of how each reasonable alternative performs in terms of their sustainability, as evidenced through the Sustainability Appraisal (SA) process.

3.9 Four spatial options were considered to test incremental growth through the SA process, building on the preferred option identified within the first Regulation 18 Draft Local Plan presented in March 2024 and this is presented below:

- Spatial Option 1: Residential Development in / adjacent to Sustainable Settlements

  Spatial Option 1 includes all proposed allocations contained in the first Regulation 18 draft Local Plan presented in March 2024 alongside the potential housing site at Owlsbury, Uckfield and new employment floorspace at Ashdown Business Park, Maresfield that featured in that draft Local Plan. It was considered that this spatial option is likely to have the least impact upon the landscape and character of existing settlements; however, it would fall short of meeting the housing and employment needs for the district. The lack a critical growth mass may result in limited infrastructure improvements due to insufficient viability. Additionally, town centres and villages will not benefit from an increase population and the potential for economic prosperity.

- Spatial Option 2: Small & Medium Sites around Sustainable Settlements

  Spatial Option 2 includes all proposed allocations contains in the first Regulation 18 draft Local Plan presented in March 2024 with additional small and medium sites around sustainable settlements, the potential extension of West of Polegate and small and medium employment sites along the A22 at Lower Dicker. This option would fall of meeting the district's housing need but would exceed the employment need. Although this option is likely to have more limited environmental impacts, social and economic impacts will be equally limited as a result of more constrained development.

- Spatial Option 3: Small & Medium Site + Significant Extensions to Existing Settlements

  Spatial Option 3 is a combination of Option 1 and 2, excluding small and medium employment sites along the A22, but with the addition the residential development to the West of Hailsham and employment provision North of Polegate. This option would meet most of the housing need for the district and all of the employment need, including a contribution to the need of neighbouring authorities. This option will result in environmental impacts, but it is considered that many of these could be mitigated. The option will also result in positive social and economic impacts as a result of new development.

- Spatial Option 4: Small & Medium Site + Significant Extensions to Existing Settlements + Village Settlements

  Spatial Option 4 includes Option 3 alongside residential development at Hemond Stud, East Hoathly and Laughton Park Farm, East Hoathly, and associated employment provision. This option would meet the district's housing need and significantly exceed the employment need. The option will result in greater environmental impacts, but it is considered that some of these could be mitigated. The option will also result in positive social and economic impacts as a result of development and identifies areas for future growth beyond the Plan period.

Preferred Spatial Option for the 'Focused' Regulation 18 Local Plan

3.10 The assessment of these Spatial Options shows that Spatial Options 3 and 4 are the best performing options for the Spatial Strategy in order to meet the district's housing and employment needs, albeit that there will be

environmental impacts resulting from such options (albeit, this could be mitigated, at least in part.

3.11 The ‘Focused’ Draft Local Plan (February 2026) evidence base has been used to inform the results. However, it should be noted that some evidence is not yet complete. The Spatial Options and sites will be subject to further testing of the evidence at the next stage of the draft Local Plan (Regulation 19) and SA, which will include items such:

- Updated Transport Modelling;
- Habitats Regulations Assessment (HRA) update;
- Landscape Evidence Base Update; and
- Further Viability Testing.

3.12 The Spatial Options will be further refined and subjected to an additional SA in consideration of the updated evidence and representations. A Preferred Option will then be selected as part of the Regulation 19 Stage of the Local Plan.

4. Housing Supply

Previous consultations on Housing Supply

4.1 Draft housing allocations were introduced in the last iteration of the draft Wealden Local Plan (Regulation 18) published in March 2024, resulting in the provision of an overall housing figure for Wealden of 15,729 homes over the prospective plan period at that time (1 October 2023 to 31 March 2040), achieving an annual target of 953 homes per year and a shortfall of 247 homes per year on the target 1,200 dpa under the ‘standard methodology’. This housing supply calculation included a windfall allowance of 2,000 dwellings over the plan period. The proposed overall housing supply figure was a ‘capacity’ based figure, based on the level of housing that can be delivered within the plan period, having regard to identified constraints and potential development capacity, which were:

- Potential highways impacts, particularly around the A22 and A26 corridor, which will likely constrain growth in the south and north of the district respectively, particularly around Hailsham and Uckfield and the surrounding areas, accounting for cumulative impacts;
- Flood risk, particularly to the southeast of the district and around urban areas that surround Eastbourne;

- Landscape considerations in relation to the High Weald National Landscape and the setting of the South Downs National Park; and
- Biodiversity designations and habitats across the district.

4.2 The following bullet points provide a summary of the common themes raised from the consultation in relation to the preferred option included in the draft Wealden Local Plan (Regulation 18) published in March 2024:

- Housing numbers proposed are excessive, unsustainable, and disproportionate in some areas;
- Housing growth has an adverse effect on environmentally protected areas, biodiversity features, highway capacity and character of the area;
- The district is constrained in transport capacity terms and sustainable travel options, as well as having inadequate infrastructure. There was support for a capacity-based approach or even to seek a reduction in housing further;
- Insufficient infrastructure, including Suitable Alternative Natural Green Space (SANGS) capacity, to support growth;
- Some stated that the policy should have a presumption against development in certain areas (e.g. within 7km of the Ashdown Forest);
- The Sussex Wildlife Trust support the progression of a capacity-based housing figure and the Council's view that they are unable to deliver their housing need sustainably;
- It was suggested that more work was needed to secure affordable housing; housing for the elderly, single persons, key workers, starter homes, and those in local need;
- Some respondents suggested that we should allow for some growth in rural/village areas;
- It was stated that the draft Plan and policy have inconsistencies in how areas are assessed in terms of sustainability, and contest some of the assumptions made. It was suggested that this would require further assessment and consideration of these issues;
- There was support for more innovative options to meet housing needs, such as a new settlement, and making use of existing stock and brownfield land, before new build on greenfield land is needed;
- It was stated that the draft Plan was inconsistent with NPPF, and raises concerns on issues such as Duty to Cooperate; failure to meet

neighbouring authority needs; inadequate plan period proposed; and inadequate evidence base;

- It was stated that the draft Plan failed to meet identified needs, and no exceptional circumstances are presented to justify not meeting the number of homes required;
- There was concern that failure to meet housing needs means a failure to address affordability issues in the district;
- Some stated that there was an over reliance on the windfall strategy, as this level of past delivery will reduce significantly when development becomes Plan led rather than based on a presumption in favour of development;
- There was concern at past delivery rates of housing, and a suggestion to apply an industry standard of 10% non-implementation rates on all permissions, to be more accurate in the assumptions made, particularly on the windfall strategy; and
- A significant number of representations raised concerns with specific settlements/housing proposals, which will require specific consideration.

4.3 Five statutory consultees provided the following comments on draft policy SS2 (Provision of New Homes):

- National Highways are supportive of the draft policy and methods used to assess sustainable accessibility of settlements. The organisation should be consulted further, and the Plan should consider cumulative impacts;
- ESCC suggested amendments to the supporting text to the policy;
- TWBC did not support Part 1 of the draft policy, as Wealden District Council should be meeting growth needs in full;
- EBC consider that further detailed explanation may be required to demonstrate the exceptional circumstances that mean WDC cannot meet its own development needs, especially noting EBC will have unmet need also. EBC consider that the draft Plan places an over reliance on windfall development, and that more homes should be located in top tier settlements of Heathfield and Crowborough. Advice is also given on corrections to calculations in Table 5 of the draft Plan; and
- Rother District Council (RDC) note modest growth proposed in areas closest to the Rother District, namely Ninfield and Wadhurst, noting that the distribution of growth is informed by the Council's SHELAA and is

supported in principle. RDC also welcomes joint work on transport impacts of both Plans.

4.4 In addition, the Council consulted on a proposed development at Land West of Uckfield, Owlsbury for the provision of residential development, which generated a significant number of objections from members of the public. The main comments received are summarised below:

- The site is detached from Uckfield, with limited connectivity to its services and facilities;
- The site could not be realistically served by sustainable transport methods, including by necessary frequent and high-quality bus services, nor can it provide connections for non-car modes of travel;
- Several object to development beyond the A22, as it not well integrated to Uckfield, and steps beyond this clear defensible boundary to the edge of the existing settlement were not supported;
- It was noted that significant infrastructure will be required;
- It was stated that the development would have an adverse impact on the environment, landscape, ecology and wildlife, and local road network;
- It was considered that there is a failure to masterplan for Uckfield and this development leads to loss of significant greenfield land;
- The development could impact the quality of life and wellbeing of the town;
- It was stated that the development was disproportionate in terms of scale and growth for Uckfield and the surrounding area;
- There were concerns about the impact on the Ashdown Forest;
- It was stated that there was a lack of information or detail available to fully comment on proposals and the impact likely to arise;
- It was stated that further information was needed on matters including a SANGS proposal, parking provision, affordable housing and employment space;
- It was stated that the site conflicts with the vision of the Plan; and
- It was considered that WDC was inconsistent in its approach to an allocation here, but not on other large-scale sites adjacent/nearby other settlements.

Housing Need Assessment

4.5 The Planning Practice Guidance (PPG)[11] explains that there is a difference between 'Housing Need' and the 'Housing Requirement'. It explains that housing need is an unconstrained assessment of the minimum number of homes needed in an area and is the first step is deciding how many homes need to be planned for. The housing requirement on the other hand is the minimum number of homes that a plan seeks to provide during the plan period. This uses housing need as the starting point but is a separate exercise that assesses land availability, constraints on development and any other relevant matters. It also accounts for any provision towards unmet need that cannot be met in neighbouring areas.

4.6 In accordance with paragraph 11 of the NPPF, strategic policies should provide for objectively assessed need for housing. The starting point for this is the 'Standard Method'.

4.7 As set out earlier in this paper, the revised NPPF published in December 2024 introduced a new 'standard method' that uses existing housing stock, rather that household projections, as per the former 'standard method', and then uplifting needs, and the target, based on median affordability ratios. This resulted in a significant change to Wealden's housing need following the draft Wealden Local Plan consultation (Regulation 18) held in March 2024, from a need of 1,200 homes per year to 1,457 homes per year.

4.8 Paragraph 62 of the NPPF states:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance".

4.9 The Council previously commissioned consultants Iceni Projects Ltd to prepare a Local Housing Need Assessment (LHNA) which was finalised in August 2021 to support the first draft Wealden Local Plan (Regulation 18) published in March 2024. The LHNA sets out the overall housing need for the district, as well as affordable housing need (including other specialist types of accommodation i.e. older persons), in view of national planning policy and local demographics trends. The study also considers the Housing Market Area (HMA) for Wealden District and its place within the wider subregion. The Council reappointed Iceni Projects ltd to prepare an LHNA following the changes to the NPPF in December 2024, which updates and

[11] Planning Practice Guidance (PPG)

replaces the initial report. It takes into account more recent housing market conditions, demographic dynamics, and policy changes at both the national and local levels and was published in January 2026[12].

4.10 Paragraph 62 of the NPPF then goes on to state:

"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for".

4.11 The Council has engaged collaboratively with its neighbouring areas to understand the level of need that cannot be met within their areas. Paragraph 62 does not, however, suggest that unmet need should form part of the housing need calculation. It is a consideration when determining the amount of development that the Local Plan should plan for (i.e. when setting the housing requirement).

Housing Requirement Testing

4.12 Draft policy SS2 (Provision of Homes) of the 'Focused' Draft Wealden Local Plan sets out a housing target across the new plan period (1 April 2025 to 31 March 2042) of 16,609 (net) dwellings to be met through committed schemes, sites allocations and windfall development. In determining the housing requirement for the 'Focused' Draft Wealden Local Plan (Regulation 18), the Council has considered the following four factors which have informed draft policy SS2:

- **Committed Supply:** this includes sites under construction, existing site allocations and extant planning permissions. The level of committed supply determined the amount to be planned for (i.e. the residual requirement).
- **Unmet Need:** in accordance with the NPPF and legal obligations under the Duty to Co-Operate, the Council has given consideration to the extent to which it can oversupply in order to contribute towards needs arising in neighbouring areas.
- **Site Selection:** the Council has carried out a detailed and robust assessment of potential sites. This exercise accounts for the constraints (both environmental and infrastructure) to development set out within the NPPF, in particular paragraph 11b and footnote 7.

[12] Wealden Local Housing Needs Assessment (January 2026)

- **Sustainability Appraisal:** a legal requirement, which ensures that reasonable alternative options for the spatial strategy and housing growth have been appraised against the sustainability framework and recorded within the Sustainability Appraisal (SA) which accompanies the draft Local Plan.

4.13 The Council's housing requirement is supply led. The extent to which it can meet its need and potentially contribute towards unmet need arising elsewhere is guided by the availability and suitability of sites following the principles set out in the NPPF.

4.14 To inform this 'Focused' Draft Wealden Local Plan (Regulation 18), we have tested a number of growth scenarios to understand whether we can meet our housing needs as set out through the 'standard method', and whether certain development sites are likely to be deliverable and can be included in our draft spatial strategy at this stage. We have also individually assessed sites submitted as part of the Council's SHELAA[13], with those identified as 'suitable' proceeding to become draft site allocations in this 'Focused' Draft Wealden Local Plan (Regulation 18). It is only those draft site allocations that are included in draft policy SS2 (Provision of Homes) that comprise our current proposed housing provision.

4.15 However, there are several additional sites identified in the review and assessment work undertaken that may represent additional opportunities for housing growth, subject to further assessment, the submission of additional information, and/or technical matters being overcome. The NPPF requires that local planning authorities should seek to meet their full need for both market and affordable housing as far as is consistent with other policies in the NPPF, and noting that the above housing provision identified in draft policy SS2 (Provision of Homes) results in a shortfall in housing delivery of 8,160 (net) dwellings over the plan period, it is considered prudent to investigate these potential sites further; especially noting that these potential sites and additional yield may deliver an additional 4,854 (net) dwellings over the Plan period.

Site Assessment

4.16 To decide which sites will be allocated for development in the 'Focused' Draft Wealden Local Plan (Regulation 18), the Council has undertaken a robust assessment process to identify and assess the potential sites. The

[13] Wealden District Strategic Housing and Economic Land Availability Assessment (SHELAA), January 2026

first stage of this process was to update the SHELAA published in February 2024. The previous SHELAA set out the sites which were considered through the Site Selection Process. The sites included within the SHELAA have then been assessed against the Site Selection Methodology (SSM). This assessment process resulted in a shortlist of sites which were also tested primarily through the Sustainability Appraisal (SA), but also the Habitats Regulations Assessment (HRA) and early transport modelling work to confirm their suitability for draft allocation in the draft Wealden Local Plan (Regulation 18) published in March 2024.

4.17 The Site Selection process resulted in the 101 proposed residential allocations across 110 SHELAA sites, yielding 5,616 dwellings across the plan period at that time (1 October 2023 to 31 March 2040).

4.18 Following the consultation on the draft Wealden Local Plan (Regulation 18) published in March 2024, the Council engaged in further site work with the objective to identify further capacity to help address housing need. In this respect, the approach did not intend to be a review of the Site Selection work carried out to date, but rather a complementary step in order to maximise housing supply in the Local Plan (subject to constraints).

4.19 A two-step process was followed starting with a comprehensive review of all SHELAA sites submitted. This would identify those sites located within or in the periphery of sustainable settlements; those sites which, although constrained, have potential for these to be addressed and/or appropriately mitigated to progress to a draft site allocation; those proposed draft site allocations which may have additional capacity; or those sites of sufficient scale which could act as stand-alone neighbourhoods supported by on-site infrastructure and services which could enable them to be self-sufficient and deliver sustainable places. This was followed by the assessment of the sites (i.e. the reasonable alternatives) through the Sustainability Appraisal (SA).

4.20 At the time of writing the Local Plan:

- 13 of the initial 101 allocations had either received planning permission or have been formally withdrawn by the site proponents;
- 2 of the initial 101 proposed allocations saw their proposed yield increased;
- 83 of the initial 101 proposed allocations remain unaltered;
- 22 additional sites are proposed for allocation (alongside those allocations identified in the draft Wealden Local Plan (Regulation 18)). However, it should be noted that the Council has some concerns in relation to the site Land at Owlsbury Farm, Lewes Road, Uckfield,

namely the extent of evidence available on the ecological impact of development and the connectivity to Uckfield's key town centre services. Therefore, an alternative scenario is also set out in the spatial strategy chapter of the 'Focused' Draft Wealden Local Plan that excludes the site; and

- 27 option sites that represent additional opportunities for housing growth, subject to further assessment, submission of additional information, and/or technical matters being overcome.

5. Retail Provision and Town Centres

Previous consultations on Retail Provision and Town Centres

5.1 Wealden District Council commissioned Nexus Planning to undertake Wealden's initial Town Centre Study[14], which was published in July 2022. This report provides a baseline assessment for town centre development in Wealden District (particularly retail and leisure uses) including trends, a retail demand and needs assessment and health checks for each of the district's main town/village centres including Hailsham, Uckfield, Crowborough, Heathfield, Polegate, Wadhurst and Forest Row. The report also provides options and recommendations for the local authority in terms of a town centre hierarchy, town centre boundaries and local impact thresholds.

5.2 Draft policy SS4 (Retail Provision and Town Centres) introduced targets to provide convenience and comparison retail floorspace. Whilst some limited capacity for retail floorspace was identified, there was a level of uncertainty surrounding these projections in the longer-term and therefore the evidence suggested that allocations for retail floorspace was not needed but any additional floorspace coming forward should be focused within our District, Service and Local Centre boundaries in accordance with our town centre hierarchy that was established under draft policy TC1 (District, Service and Local Centre Hierarchy and 'Town Centre' First Principles). Furthermore, it was considered within the evidence base that there was sufficient floorspace at that time to meet current levels of operator demand and that investment in existing units (including vacant units) and undeveloped sites are needed in any case to support/improve our existing centres.

[14] Wealden Town Centre Study (July 2022)

5.3 Representations received on the draft Wealden Local Plan (Regulation 18) presented in March 2024 in this respect were broadly supportive of the town centre policies, although there were some objections:

- There was significant objection to the delivery of out-of-town retail provision and that the Council should ensure that this is avoided;
- There was significant support for the 20-minute neighbourhood approach and associated benefits;
- It was suggested by some respondents that town centre policies should protect local retail outlets and other community assets;
- It was noted by some respondents that the retail evidence base does not accord with the proposed plan period as it stood;
- Several respondents suggested that we should reference the interdependency of car parking facilities and costs associated for a retail centre;
- It was noted by a respondent that focus should be on small shops and local businesses, craftspeople and producers, and their protection;
- Other respondents suggested that town centre policy should be balanced with considerations for sustainability, the local infrastructure's capacity to support increased activity, and the preservation of Wealden's rural character and natural landscape; and
- Several respondents also suggested that empty shops should be repurposed for housing (i.e. brownfield land) rather than allocating land for housing in rural areas.

Evidence Base Update and Recommendations

5.4 The Council has updated its Wealden Town Centre Study (2026)[15] to account for any changes since the Covid-19 pandemic, including its retail capacity figures over the study period (2025-2040), based on existing provisions and the new population growth figures emanating from our 'standard method' calculation for housing need. This has resulted in some increases in both convenience and comparison goods floorspace capacity compared to the previous Wealden Town Centre Study (2022) and what was presented in policy SS4 (Retail Provision and Town Centres) of the draft Wealden Local Plan (March 2024).

[15] Wealden Town Centres Study (January 2026)

5.5 The Wealden Town Centre Study (2026) identifies the maximum floorspace capacity needed from its base date on 1 April 2025 to 31 March 2040. In terms of comparison goods capacity, by 2040, forecasts identified net quantitative 'capacity' range of between 7,600 and 11,900 sqm. For convenience goods, net quantitative 'capacity' for new convenience goods facilities in Wealden to 2040 is also limited and ranges between 7,600 and 9,700 sqm.

5.6 Whilst the study identified an higher quantitative capacity for new retail floorspace overall, compared to the Wealden Town Centre Study (July 2022), this should be distinguished from need, which is more than a quantitative measure and involves qualitative considerations. In addition, there is significant uncertainty in forecasting long-term retail trends and consumer behaviour. The updated report maintains its initial recommendation that the Council does not specifically need to allocate sites for new retail or commercial leisure facilities through the emerging local plan, but should instead focus any additional floorspace coming forward within our District, Service and Local Centre boundaries in accordance with our town centre hierarchy as identified in the draft Wealden Local Plan (March 2024) previously presented.

6. Employment

Previous consultations on Employment

6.1 Both Eastbourne Borough Council and Wealden District Council commissioned Iceni Projects to undertake an Employment and Economic Study[16] that was published in April 2022. The study identifies the Functional Economic Market Area (FEMA) for the area and provides forecasts for economic need for the period between 2019 to 2039. The study also provides a summary of existing employment areas in the district (i.e. the condition of the industrial estates, options to intensify those industrial estates etc.) and economic development briefings for both local authorities.

6.2 In terms of outputs and future employment land needs, the report confirms that for Wealden District, there is a level of demand for offices, particularly for higher quality places, albeit that there is little on the market. For industrial and warehousing development (i.e. Use Classes B2 and B8), recent completions indicated a strong demand for industrial and warehousing units and that losses have been limited. Despite these gains, it was considered that the market remains strongly undersupplied. In spatial terms, it was

[16] Employment and Economic Study – Eastbourne and Wealden, April 2022

recommended that Wealden should make provision across the district as all the towns with both northern and southern industrial estates are essentially ‘full’. It was recommended that at least one larger allocation (10 ha +) in the district, preferably in the A22/A27 corridor would be appropriate, making use of connectivity and proximity of these strategic routeways.

6.3 Draft policy SS5 (Provision of Employment Floorspace) set out the Council's position for the purpose of the draft Wealden Local Plan (Regulation 18) consultation presented in March 2024 by supporting the provision of at least 84,850 sqm of employment floorspace via the allocation of strategic employment sites, the delivery of large commitments, the retention of existing employment premises, the provision of additional floorspace at existing employment sites, the delivery of new economic development in rural areas and the provision of new offices within Wealden’s designated District, Service and Local Centres. The proposed approach resulted in a significant undersupply requiring further work to be carry out in subsequent stages of the Local Plan preparation.

6.4 Draft policy SS6 (Strategic Employment Allocations) of the Draft Wealden Local Plan (Regulation 18) published in March 2024 also identified proposed strategic employment allocations, where new employment uses will be supported and safeguarded. In addition, three additional employment sites that are committed sites (i.e. sites with planning permission for employment uses) have been referenced in this policy due to their scale (over 5,000 sqm (net) employment floorspace).

6.5 The proposed draft policies attracted a high volume of representations. The majority of respondents to this question objected to the proposed policy with limited support, although there was also a high number of neutral responses. The main comments can be summarised as follows:

- It was stated that the evidence base should be reconsidered, as it was unclear, and there were concerns raised on matters such as use of the ‘Past Take Up’ method to calculate need. If using an alternative method, this shows a significantly reduced employment floorspace need;
- Some concerns in terms of the overprovision of employment floorspace, based on inaccurate or flawed evidence, with subsequent development leading to harm to the countryside and our environmental limits;
- It was stated that employment needs must be weighed against social and environmental needs;

- It was suggested that excessive employment land in rural areas exacerbates rural commuting, and that development has adverse effects on the local highway network;
- It was stated that the spatial strategy for employment floorspace should be aligned with that for housing. Some suggestion to secure mixed-use schemes in rural areas;
- It was stated that development should be in sustainable areas with a good road network, and that WDC should consider the reuse of existing buildings first;
- There were also objections as to the inadequate employment floorspace being identified through site allocations to meet need and to address significant undersupply issues;
- It was stated that the needs arising from neighbouring authorities should be considered and met also;
- Parts of the policy are too broad and could be detrimental to local centres, where certain uses should be retained at ground floor level. The draft policy should also distinguish between retail/service space and industrial/office space when identifying suitable areas;
- The draft policy does not consider individual needs across different parts of the district, or for different business types; and
- It was stated that priority should be given to certain uses, or types of business, or linked to local people.

6.6 Four statutory consultees provided comments on draft policy SS5 (Provision of Employment Floorspace) and SS6 (Strategic Employment Allocations) in the previous consultation process:

- National Highways were supportive of draft policy and the commitment to ensuring that employment floorspace is allocated within sustainable locations;
- National Highways also noted that it should be consulted on all employment site allocations ahead of Regulation 19 stage to determine the impacts on the strategic road network and that the draft Plan should consider cumulative impacts on neighbouring authorities;
- EBC noted that the plan identifies a shortfall in employment floorspace and supports an additional ‘Call for Sites’ to identify further employment land. It was also acknowledged that the Council is committed to meet EBCs employment needs should sufficient land be identified;

- EBC also highlighted that consideration should be given to the transport impacts of further development in the south of Wealden district;
- RDC support the additional 'Call for Sites' to identify further employment land and to look internally for further opportunities; and
- Sevenoaks District Council (SDC) acknowledge that the plan identifies a shortfall in employment floorspace and the additional 'Call for Sites'.

6.7 In addition, the Council consulted on a proposed strategic employment development to the south and east of the existing Ashdown Business Park, Michael Way, Maresfield. It generated a large number of objections with very limited support and some neutral responses. The main comments can be summarised as follows:

- The majority of respondents were not supportive of the Ashdown Business Park extension. It was stated that the road network at Maresfield cannot cope with the scale of proposed development and there are limited options for public transport connections to the site;
- It was also stated that the location is not considered suitable, and development of this type should be directed to the south of the district. It was considered that there are alternative sites available;
- It was stated that the proposal erodes buffer zones between settlements;
- There were concerns over the location of development in relation to the Ashdown Forest;
- The proposal was considered disproportionate in terms of the scale of development, detached from Uckfield and would have an adverse impact on the settlement and town centre;
- It was stated that development would adversely impact the habitat and environment, especially noting ancient woodland adjacent and flood risks, and have economic and social impacts, and has inadequate existing infrastructure;
- It was stated by some respondents that there is no need for the development, as sufficient land is allocated within the Plan and there is no demand;
- It was stated that the proposal is contrary to the vision of the Local Plan and national planning policy;
- Other representations that support the proposal welcomed the location of the site near to strategic transport links (especially roads);

- Some respondents considered that the site will help to meet great needs in the region, and nearby towns such as Crowborough, which are more constrained; and
- It was stated that development would be available for a variety of users/businesses.

6.8 Two statutory consultees commented on the proposal as follows:

- It was considered by ESCC that the site could be sensitive to development and not well connected to the existing Ashdown Business Park. It was also noted that the area being considered for employment development is of a much larger scale than the existing well contained business park, which is closely related to the two 'A' roads on either side; and
- Network Rail suggested that there should be a means of better connecting the site with Uckfield railway station, which would encourage greater active travel and support sustainable transport options.

Update to the Employment Need Quantum

6.9 The Council, alongside Eastbourne Borough Council (EBC) have updated the previous Employment and Economic Study for Eastbourne and Wealden (2022). The updated study[17] aligns with the new plan period for 'Focused' Draft Wealden Local Plan (February 2026) from 2025 to 2042 and identified changes to employment need within the district, which have been reflected within amended policy SS5 (Provision of Employment Floorspace).

6.10 For offices in Wealden, the evidence confirms that the office market continues to see a lack of demand for space following the Covid-19 pandemic and that businesses are continuing with home/hybrid working. Looking to 2042, it was still considered reasonable to expect some future demand, particularly for modern premises, given that older, unsuitable floorspace has been lost to other uses (particularly housing).The study recommends that between 2025 and 2042 that it would be appropriate to plan for 3.2 ha (16,100 sqm) for new offices, which was at the lower end of the range for the previous study. It was recommended within the evidence that although there is forecasted growth in office-based sectors, in reality, there are no signals for substantial new build office developments in Wealden. It is anticipated that additional office floorspace can be

[17] Employment and Economic Study (Update) – Eastbourne and Wealden, January 2026

accommodated through smaller office provisions/additions/refurbishments within the existing town centres of the district.

6.11 In relation to industrial and warehouse floorspace provision, the evidence continues to state that there is continued strong demand for a range of industrial units to support businesses throughout all stages of a business life cycle (i.e. start-ups and grow-on space). There is also a reported lack of flexibility in the market to allow for business expansion and churn, which is demonstrated by low vacancy rates in Wealden (at only 5.2%) and continued rental growth. Overall, the market for industrial and warehousing units remains buoyant and requires further industrial developments to meet demand of 178,300sqm.

6.12 The Council will revisit the wider Economy chapter in the pre-submission Regulation 19 version of the Local Plan, in view of the impending changes to the NPPF and to account for the update to our local evidence base.

Distribution and Type of Employment Space

6.13 The former South East Local Enterprise Partnership (SELEP) previously identified growth corridors/areas in Wealden District. The Council has seen several large employment sites come forward in this strategic employment corridor along the A22/A26 over recent years (the Ashdown Business Park, Michael Way and the Diamond Drive, Lower Dicker industrial estate). With this in mind and the study setting out the quantum of employment development to be provided over the plan period, it is clearly imperative that this Local Plan seeks to deliver its larger employment developments within this growth corridor to make best use of those transport connections, which accords with paragraph 87 of the NPPF. Employment land in the north of the district, particularly around Uckfield and Crowborough, was specifically identified as a need during market engagement undertaken as part of the Employment and Economic Study - Wealden and Eastbourne (January 2026) resulting in the need to consider a specific allocation in that area.

6.14 The Employment and Economic Study for Eastbourne and Wealden (January 2026) further identified that whilst demand for industrial floorspace remains strong in the district, there is limited availability of all types of units, namely quality units and smaller units below 100sqm in floorspace. In addition, there is deemed to be a shortage of ‘grow on’ space, with several businesses across multiple units looking to consolidate.

6.15 The need to provide employment space in terms of qualitative provision, as well as quantitative, in the right location, is therefore key in planning for employment needs of the district. It is considered that the allocation of large-scale employment growth, on sites providing above 5,000sqm, will enable

provision of modern quality units required by the market, which can be built to enable flexibility in unit size and consolidation.

6.16 The Council has undertaken significant work on potential employment sites to be allocated within the emerging Wealden Local Plan, through both its SHELAA and SA process as described in the previous Housing Supply section of this Topic Paper. In addition to this process, the Council further explored the potential for unsuitable housing sites to deliver employment floorspace to meet the Council's employment need.

6.17 Draft policy SS6 (Strategic Employment Allocations) identifies two additional strategic employment allocations compared to the last iteration of the plan, amounting to 132,420sqm of employment floorspace overall, where new employment uses will be supported and then safeguarded for that use. These sites will be subject to further testing in progressing the Local Plan to the pre-submission Regulation 19 stage, at which time, these employment allocations will have a site allocation policy drafted as part of that Plan. Such a policy will consider site specific requirements, infrastructure provision, and mitigation measures. The policies will also consider the need for any restricted or specific uses on certain sites.

6.18 It is noted that the Council is not currently in a position to meet its own employment needs, if only the provisions of policy SS5 (Provision of Employment Floorspace) and sites allocated in policy SS6 (Strategic Employment Allocations) are taken forward to the Pre-Submission Regulation 19 stage. The Council identified four 'option' employment sites, capable of providing an additional 101,600 sqm of employment floorspace, that warrant further assessment to address outstanding technical issues. The Council is therefore seeking views and further information on these potential sites as part of the Focused Draft Wealden Local Plan (Regulation 18) consultation.

7. Conclusion and Next Steps

7.1 The Pre-Submission Regulation 19 Local Plan is the next stage in the preparation of the Local Plan, and the Council will be looking to refine the spatial strategy further as part of that process. The Council will be continuing to update its evidence base such as the Habitats Regulation Assessment (HRA), responses to the two Regulation 18 Local Plan consultations, specifically on the spatial strategy, other site-specific evidence, transport modelling (using the county-wide transport model), as well as further rounds of the SA. The Council will also be mindful of any changes to the NPPF, which may come forward in the intervening period between the 'Focused'

Draft Wealden Local Plan (Regulation 18) and the Council's Regulation 19 Local Plan.

7.2 The emerging spatial strategy is crucial in identifying the scale and location of growth across the district and forms the basis for the draft preferred allocations for strategic housing and employment sites at this stage in the plan-making process. In addition, it means that the Council can attempt to identify infrastructure deficits for certain settlements or areas and can therefore help the Council to identify mitigation measures and investment in infrastructure moving forward. The Council will continue to test and refine this spatial option (transport modelling, HRA, SA and viability) in the lead up to the next stage of the Local Plan process.