



MARCH 2024

Wealden Urban Capacity Study

Final Report

Iceni Projects Limited on behalf of
Wealden District Council

March 2024

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ON BEHALF OF WEALDEN
DISTRICT COUNCIL

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Wealden Urban Capacity Study
FINAL REPORT

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1. INTRODUCTION

- 1.1 Wealden District Council have appointed Icen Projects and Urban Intelligence to undertake an Urban Capacity Study for the district.
- 1.2 The main purpose of the Urban Capacity Study is to provide an analysis of the potential urban capacity of Wealden's varying settlements for housing, to identify sites and the scale of brownfield land and suitable extension sites available to accommodate the Council's housing requirements up to 2040.
- 1.3 The latest Standard Method assessment of housing need for the draft Regulation 18 Local Plan identifies a need for 1,200 dwellings per annum. This equates to a total need for 19,800 homes over the proposed plan period from 1 October 2023 to 31 March 2040 (16.5 years).

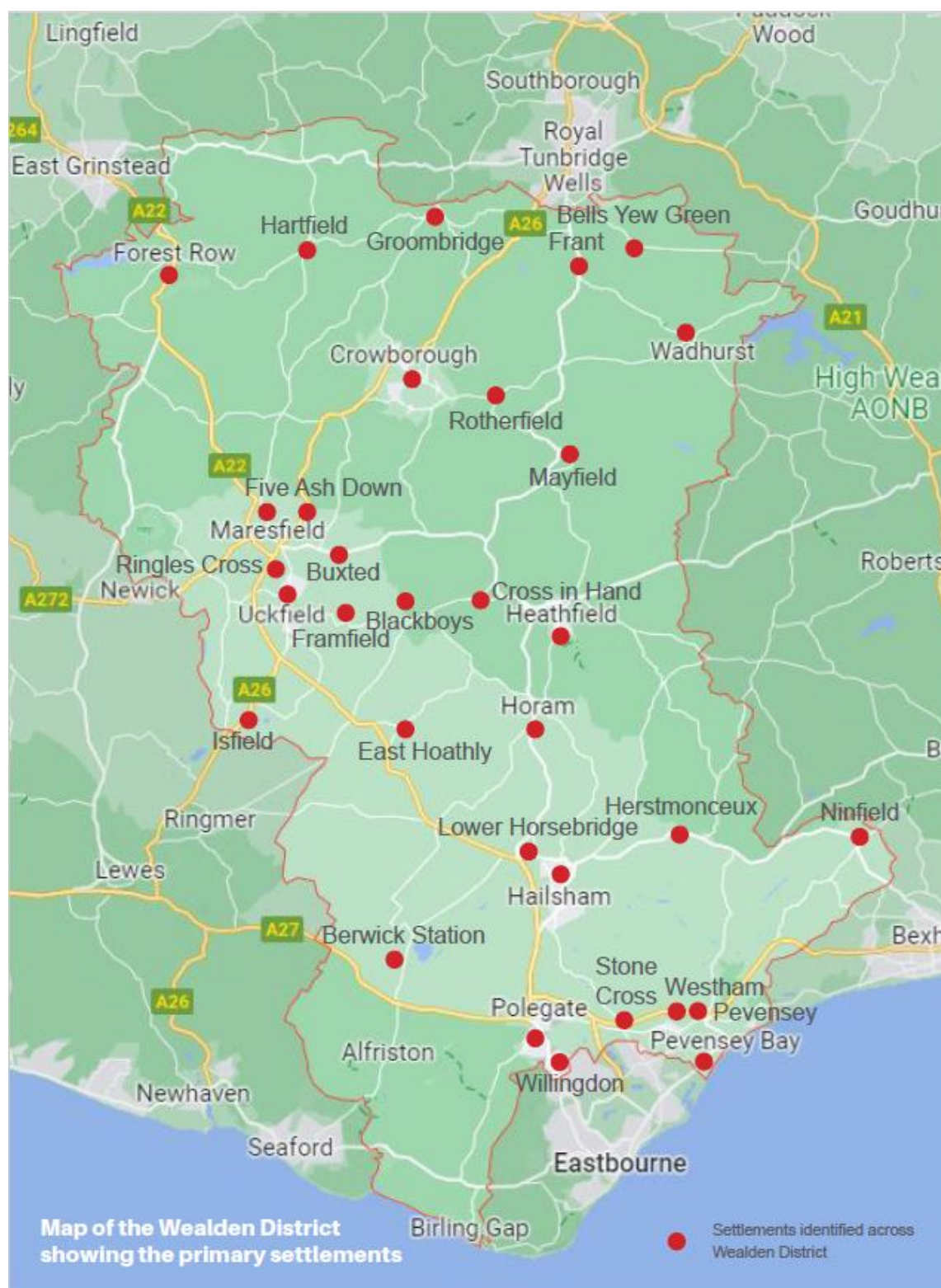
Approach

- 1.4 The Planning Practice Guidance (PPG)¹ concerning Housing and economic land availability assessments states that:
- "It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area." (Reference ID: 3-010-20190722)*
- 1.5 This Urban Capacity Study fulfils this requirement and ensures that Wealden District Council has identified all potential 'suitable' sites for development purposes within their urban areas. The urban areas that have been assessed are identified in the map overleaf.
- 1.6 As well as the urban areas in these settlements, the immediately surrounding areas have also been assessed for the potential for urban extensions. The surrounding areas have been defined based on those identified in the Landscape Sensitivity Assessment. Where settlements have not been assessed in that document then we have assumed a 100m boundary from the edge of the developed area.
- 1.7 While the Council have sought to focus on urban areas within this report, this does not exclude potential capacity in rural areas coming forward. However, it should be noted that such supply is

¹<https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#Identification-of-sites-and-broad-locations>

likely to be limited in comparison to urban areas, as Wealden includes part of the South Downs National Park (albeit in planning terms this area is managed by the South Downs National Park Authority) and the High Weald National Landscape.

Table 1.1 Urban Areas Assessed for Capacity



Source: Iceni Projects, based on OS and Google Data

- 1.8 This study will assist the Council with the delivery of a sustainable development strategy as part of their Local Plan, ensuring that it promotes the effective use of land at the right density within the existing built-up areas in sustainable locations.
- 1.9 The study is to be read in conjunction with the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA). As such, it does not include any sites which were identified in that document. This ensures a robust approach in demonstrating that all reasonable options to identify sites have been explored without double counting.
- 1.10 The structure of the report is in three main stages. The first stage identifies and assesses sites, the second stage looks at the potential density of sites in different parts of the district based on the current urban makeup of these settlements. The third and final stage then looks at the capacity that the suitable sites can generate and what the combined capacity is for the district.
- 1.11 We also provide further guidance to the council as to how additional supply can be identified and generated.

Guidance

- 1.12 The PPG does not provide guidance about Urban Capacity Studies but does so for the related SHELAA. This process has already been undertaken by the Council and the sites identified and assessed within the SHELAA have been excluded from assessment to avoid double-counting.
- 1.13 The SHELAA assessment followed the PPG, which sets out the types of sites that may be relevant in the assessment process including:
- Existing housing and economic development allocations and site development briefs not yet with planning permission;
 - Planning permissions for housing and economic development that are unimplemented or under construction;
 - Planning applications that have been refused or withdrawn;
 - Land in the local authority's ownership;
 - Surplus and likely to become surplus public sector land;
 - Sites with permission in principle, and identified brownfield land;
 - Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential);
 - Additional opportunities for unestablished uses (e.g. making productive use of under-utilised facilities such as garage blocks);

- Business requirements and aspirations;
- Sites in rural locations;
- Large-scale redevelopment and redesign of existing residential or economic areas;
- Sites in adjoining villages and rural exceptions sites;
- Potential urban extensions and new free-standing settlements;

- 1.14 While there is no formal guidance for Urban Capacity Studies best practice guidance does exist although it is somewhat dated². This guidance “Tapping the Potential” was produced in 1999 by Urbed for the Department for Environment Transport and the Regions.
- 1.15 The Urbed report identifies sources of capacity, many of which are also included within the SHELAA guidance, and therefore already picked up in that document. In any case, using our bespoke computational software, the approach we have taken is to examine every parcel of land in the urban areas to establish its suitability for housing development.
- 1.16 The Urbed report also provides guidance for surveying the capacity, assessing the yield and discounting the potential. This study provides a detailed and bespoke urban design element from which densities and therefore capacities have been established. We have also taken a final step to assess what level of discount should be appropriate.

² <http://urbed.coop/sites/default/files/Tapping%20the%20Potential%20Report.pdf>

2. METHODOLOGY

- 2.1 This section of the report sets out the methodology used in the process of producing an Urban Capacity Study. It is set out to reflect the different stages of the work we have undertaken.

Identifying Sites

- 2.2 There are two main stages to go through to identify sites. The first is a site-gathering exercise to ensure only certain types of sites are used, with the second stage being the sifting exercise to ensure only those sites in the main urban settlements are taken forward. The potential sources of supply are set out in the table below.

Table 2.1 Potential Sources of Capacity by Priority

Site Category	Methodology
Existing Allocations	All existing allocations that have a capacity for 5 dwellings or more.
Sites with planning permission	Sites with planning permission that have a minimum capacity of 5 dwellings as of 1 October 2023. This includes some sites which are in the process of being built out.
Site subject to a planning application (withdrawn, refused or lapsed)	Sites that are subject to withdrawn, refused or lapsed planning applications that have a minimum capacity of 5 dwellings.
Surplus and likely to become surplus public sector land	Sites from the Register of Surplus Land that have a minimum capacity of 5 dwellings.
Site on the brownfield land register	Sites on any brownfield register that have a minimum capacity of 5 dwellings.
Local authority and public sector-owned land	Iceni/UI interrogation of the Land Registry to identify freehold parcels within the ownership of Wealden District Council or other public ownership that have a minimum capacity of 5 dwellings. There was a particular focus on Car Parks and Garages.
Vacant and derelict land	Iceni/UI identified derelict/vacant land through the interrogation of Ordnance Survey data. Vacant and derelict land will only be considered if it has a minimum capacity of 5 dwellings.
Additional Call for Sites	Sites identified by promoters through the latest call for sites exercise.
Unprotected Green Space	Poorer Quality public open space/ public realm identified in Open Space Strategy.
Surplus Employment Land	Vacant, under-utilised or Derelict Employment Land identified for release in ELR.

Source: Iceni Projects and Urban Intelligence

- 2.3 We also considered estate renewal programmes and planned new towns/villages but these were not part of the Council's plans at this stage. To gain information on existing uses and addresses, the modelling used the Addressbase+ database.
- 2.4 To avoid duplication, as some sites fell into more than one category, the sites were assigned based on the priority above (the higher in the Table the higher the priority). For example, if a site was

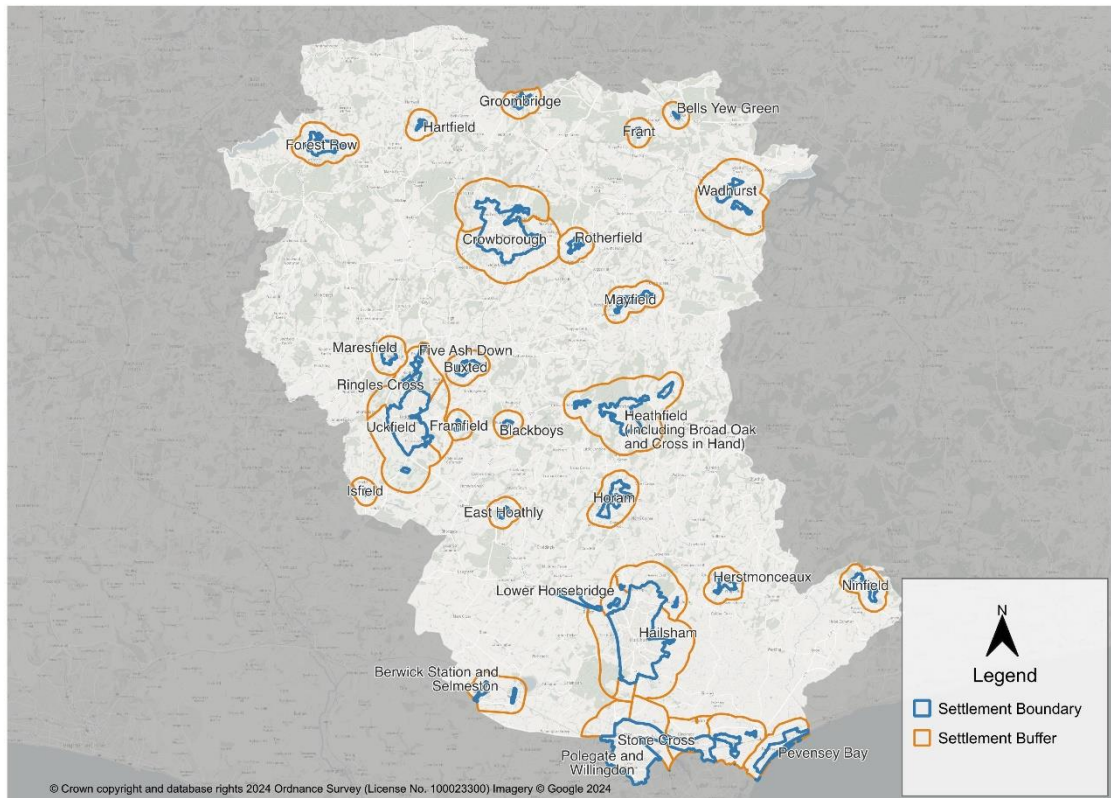
identified as both an Existing Allocation and Public Sector Owned Land, the category was assigned as an Existing Allocation.

- 2.5 We have also excluded sites which were identified within the SHELAA, which is the core document by which housing land has been identified for the Council's emerging Local Plan. The SHELAA also included many sites which would fall under one or more of the categories within Table 2.1 above.
- 2.6 The assessment identified around 1,500 potential sites for inclusion. These sites were then processed for suitability, both using spatial analytics and a manual assessment. This initial sift was to exclude sites located outside of those settlements and their buffers illustrated in Table 2.3 overleaf.
- 2.7 These settlements were chosen based on the Council's Settlement Hierarchy in the emerging Regulation 18 Local Plan and to define their extent, we have used the impact zones from the Landscape Sensitivity Assessment. Where settlements have not been assessed in that document then we have assumed a 100m boundary from the edge of the developed area.

Table 2.2 Emerging Settlement Hierarchy for the Regulation 18 Wealden Local Plan

Settlement Category	Settlement
Type 1 settlements (Town)	Crowborough, Uckfield, Hailsham and Heathfield.
Type 2 settlements (settlements that geographically relate to a regional centre with Wealden District)	Polegate, Willingdon, Stone Cross, Westham, Pevensey, Pevensey Bay.
Type 3 settlements (Primary village)	Forest Row, Horam, Mayfield, Wadhurst.
Type 4 settlements (Secondary Village)	Bells Yew Green, Berwick Station, Blackboys, Buxted, Cross-in-Hand, East Hoathly, Five Ash Down (includes Ringles Cross), Framfield, Frant, Groombridge, Hartfield, Herstmonceux, Isfield, Lower Horsebridge, Maresfield, Ninfield, Rotherfield.

Source: Wealden District Council

Table 2.3 Areas of Search

Source: Icen Projects and Urban Intelligence

2.8 To get from a gross to a net area, any of the following designations which overlapped with the identified site were removed from the site and then the boundary redrawn. In addition to excluding the SHELAA sites and to ensure that we do not encroach upon certain designations, we have also removed a buffer around them, the size of this buffer is denoted in brackets below:

- Ancient Woodland (and 15m Buffer as a minimum)
- Flood Zone 3a and 3b
- Historic Parks and Gardens
- Local Green Space
- National Nature Reserves
- Ramsar Sites
- Scheduled Ancient Monument
- Sites of Special Scientific Interest
- Special Areas of Conservation
- Special Protection Areas (and 400m Buffer)

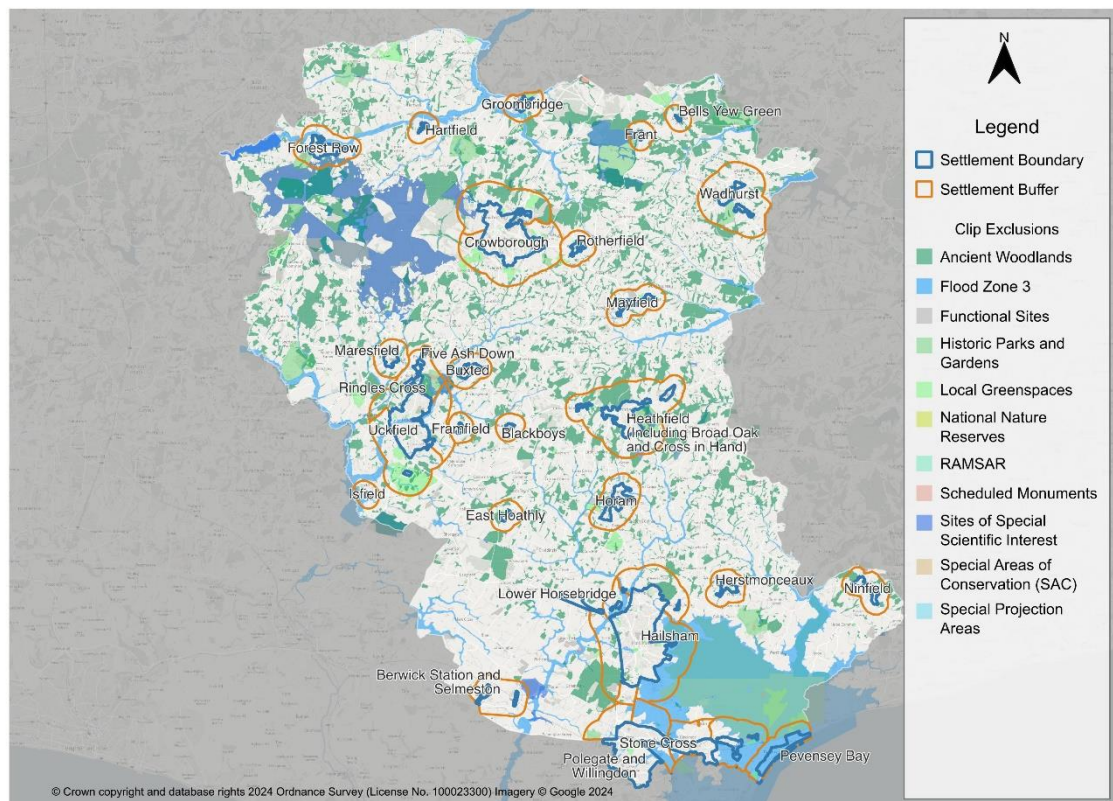
2.9 The extent of the absolute constraints are illustrated below.

2.10 Although we do not exclude sites based on being in the High Weald National Landscape, this information has been collated along with other potential constraints:

- Agricultural Land Classification
- Historic Landfill
- Local Nature Reserves
- Local Wildlife Sites
- Sewerage Works (100m)
- Suitable Alternative Natural Green Space
- Tree Preservation Orders.

2.11 We also collected information on the proximity to Listed Buildings.

Table 2.4 Map of Constraints

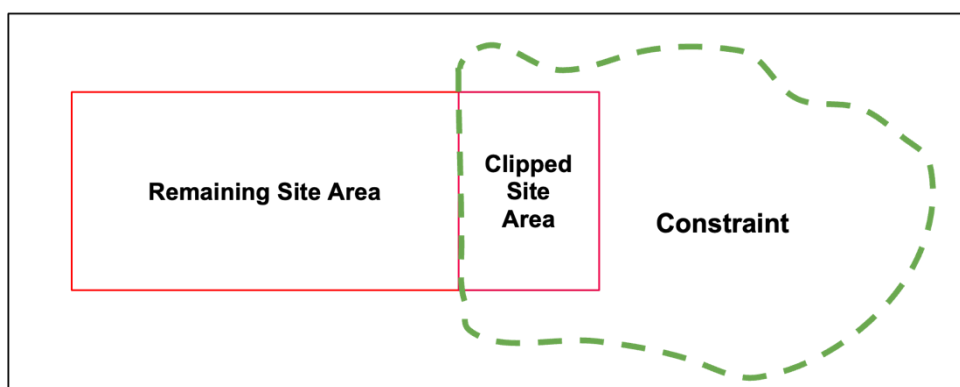


Source: Iceni Projects and Urban Intelligence

2.12 No policies or designations were considered so sensitive that any partial overlap on identified sites would make that entire site unsuitable for development. Instead, policies and designations that would

make land unsuitable for development were 'clipped' from the developable area of the identified sites, with the remaining area of the site being retained within the assessment. However, any site fully covered by 'Clip' exclusions was considered unsuitable within the analysis. This process is illustrated below.

Table 2.5 Clip Process



Source: Urban Intelligence

2.13 The results were then manually reviewed, and if one of the following conditions were met, sites were removed from the results and not carried into further stages of assessment.

- No existing access to the current road network;
- The site's composition in terms of shape or topography was not suitable for development. For example, the majority of the site was covered by existing roads, paths or water.
- The majority of the site was covered by existing mature tree planting.

2.14 Applying these constraints and the manual review resulted in 47 sites remaining and these are identified in the appendix.

2.15 One caveat to be added is that other assumptions will need to be made on a site-by-site basis (e.g. the sites will have other constraints that need to be taken into account when assessing how many homes can be built on the site). However, this is the role of the planning application process rather than this study.

Assessing the Yield

2.16 Once the site areas, net of constraints, have been calculated, we have applied density assumptions based on the settlement it is in or most closely related to and our review of its urban character. In some cases, a site falls into the settlement or buffer of more than one settlement. For example, the

Uckfield buffer encompasses Ringles Cross. Where this is the case, we have applied the assumptions around the settlement rather than the buffer. If it is in two buffer zones, we have applied the larger of the settlement's density assumptions.

- 2.17 As set out in the relevant chapter, for each settlement we have identified a minimum density range (e.g. 25-35 dpa (midpoint 30 dpa)) and a maximum density range (e.g. 45-55 dpa (midpoint 50 dpa)) based on the existing urban character. We have then summarised these into a midpoint of the midpoints of both ranges (40 dpa (midpoint of 30-50 dpa in the example above)) and the maximum of the maximum (55 dpa in the example above). This represents the reasonable range of densities for each site. This is set out in the urban design element. To calculate the yield, the net developable is multiplied by the density assumptions.
- 2.18 If a site had a calculated capacity of fewer than 5 units, then these were removed from the study. These will in effect become windfall development.
- 2.19 In addition to the sites identified in the process outlined above, as per the UCS guidance we have also included an assessment of supply from non-site specific sources. These include trends in the sub-division of existing homes, flats over shops, the reuse of empty homes and the conversion of commercial buildings.

Discounting Potential

- 2.20 The purpose of the discount is to take the unconstrained capacity and make it more realistic to what is likely to be delivered in the plan period. As Urbed explain:
- "There will be good reasons why a proportion of the capacity identified earlier in a study will not come forward for development, or may not be capable of development immediately. For example, otherwise suitable sites or buildings identified in the earlier stages may not in practice be capable of being brought forward because of viability or ownership constraints that cannot be resolved in the foreseeable future."*
- 2.21 The Urbed guidance provides a range of discounts based on site typologies. These discounts range from 25% to 100% and Urbed suggests the use of professional judgment when applying these discounts to sites. We have applied a discount of either 25% (for the sub-division of existing homes and flats over shops) or 70% (for the conversion of commercial buildings and other sites identified in the UCS process).

3. ASSESSING THE YIELD

- 3.1 Once the sites were identified and filtered, we applied the relevant settlement density assumptions from the Character Area Study to each site. The table below sets out the range of maximum and minimum densities found in each settlement. Once applied to all sites, this effectively gives a realistic range of potential capacity in the district.

Table 3.1 Density Assumptions by Settlement

	Minimum Density	Maximum Density
Bells Yew Green	20-22	25
Berwick Station	10-15	20
Blackboys	20 - 22	25
Buxted	10- 15	20 -25
Cross in Hand	25-28	30
Crowborough	20-25	50-55
East Hoathly	20	25
Forest Row	20-25	35-40
Frant	20	20
Framfield	10-15	20-25
Five Ash Down	10-15 / 30-35	35
Groombridge	10- 15	30 -35
Hailsham	20-25	50-55
Hartfield	20 -25	25
Heathfield	20-25	45-50
Herstmonceux	25	30
Horam	25	30
Isfield	20-22	25
Lower Horsebridge	20-22	25
Maresfield	5 / 25- 35	20-25
Mayfield	20-25	45-50
Ninfield	20	25
Pevensey	25-30	40-45
Pevensey Bay	20	25
Polegate	20-25	35-40
Ringles Cross	5 - 10	15
Rotherfield	25	30
Stone Cross	15	20
Uckfield	20-25	45-50
Wadhurst	15-20	30-35
Westham	15-20	40-45
Willingdon	20-25	25-30

Source: Iceni/WDC Character Area Study

- 3.2 While the character areas have a range of densities associated with them we have initially summarised these to the midpoint of the midpoints and the maximum of the maximum, which provides a reasonable assessment of the range of densities that could be applied and the range of capacity which could be identified.
- 3.3 While the site capacity identified in this report provides what we believe to be an appropriate assessment, ultimately the capacity on each site will be derived from a greater level of work produced as part of the planning application process.
- 3.4 Applying the summary density assumptions to each of the 47 sites identified results in a total unconstrained yield of between 992 and 1,422 dwellings. This is broken down by settlement in the table below.

Table 3.2 Sites and Capacity by Settlement

Settlement	Sites Identified	Mid-Point Residential Capacity	Maximum Residential Capacity
Buxted	1	5	7
Crowborough	8	174	256
Forest Row	2	11	15
Framfield	1	3	5
Hailsham	12	335	491
Heathfield	7	166	236
Herstmonceux	2	14	15
Horam	1	5	5
Maresfield	1	10	15
Mayfield	2	23	32
Ninfield	1	8	8
Polegate and Willingdon	1	6	8
Stone Cross	1	9	10
Uckfield	6	216	309
Wadhurst	1	7	10
Grand Total	47	992	1,422

Source: Icen Projects and Urban Intelligence

- 3.5 As shown, only the type 1 settlements of Crowborough, Hailsham, Heathfield and Uckfield have a yield greater than 100 dwellings. This is the same for both the mid-point and upper end of the density assumptions.
- 3.6 The median number of dwellings per settlement is around 66 for the mid-point density assumptions to 95 for the upper-end density assumptions, although there is significant variation between each settlement.

Other supply

- 3.7 The Urbed report makes a number of recommendations when examining potential sources of supply. The majority of these are picked up through a combination of the SHELAA, Brownfield Land Register, existing allocations and the site identification process.
- 3.8 However, there are some which are not picked up as they are either not site-specific or would require a policy decision to unlock them such as estate renewal programmes (there are none planned in Wealden). These sources and their potential capacity are set out below.

Sub-Division of Existing Units

- 3.9 Over the last 10 years, the district has seen an average of six new dwellings per annum being created through the sub-division of existing dwellings. This is largely through the creation of flats from larger detached and semi-detached homes.

Table 3.3 Sub-Division of Existing Dwellings

Year	Sub-Division of Existing Dwellings (Net Dwellings)
2013-2014	1
2014-2015	1
2015-2016	14
2016-2017	3
2017-2018	3
2018-2019	5
2019-2020	3
2020-2021	6
2021-2022	5
2022-2023	20
Total	61
Average	6

Source: WDC, 2024

- 3.10 If this trend was to continue over the plan period to 2040 then an additional 101 homes would be delivered in Wealden.

Flats over shops

- 3.11 The Urbed report states that “a yardstick used in a Hertfordshire study assumed that a third of the retail floor area was suitable for housing and that a third of this would be suitable for flat conversions.”

- 3.12 However, since the publication of the Urbed report, there has been a continual shift from small-scale to large-floorplate retail. Therefore, the potential from flats over shops has declined. As an adjusted assumption, we have therefore used a quarter and a quarter. The Urbed report effectively endorses this reduction by suggesting that “it may be useful to exclude retail parks and modern shopping centres from these estimates” and this is the shift to large floorplate stores we detail above.
- 3.13 According to Valuation Office Agency (VOA) statistics, there is approximately 157,000 sq. m of retail floorspace in Wealden as of 2021. A quarter of this would be 39,250 sqm of which only a quarter, or 9,813 sqm, would be suitable for flats.
- 3.14 The Urbed Report states that a conversion of 70 sq. m per flat would be appropriate to get a housing yield from this floorspace. This would equate to 140 units.

Empty Homes

- 3.15 The reuse of empty homes provides a ready supply of housing, although as the Urbed guidance states there is concern over the inclusion of this supply as most is in the private sector and the planning system has no direct control over it.
- 3.16 We have therefore only considered any empty units above a 3% threshold which is the typical percentage used in studies such as Local Housing Needs Assessments to allow for churn in the housing market.
- 3.17 Using the Council Tax Base³ we can see that there were 1,042 empty homes in the district as of October 2023. This equates to around 1.4% of all dwellings in the district. This is also below the national equivalent of 2.6%. We have therefore assumed that there is no capacity from this source of supply.

Conversion of Commercial Buildings

- 3.18 The conversion of commercial and agricultural buildings, either through their conversion, or via the demolition and rebuilding of those premises has provided a strong supply of additional homes in Wealden. This includes through permitted development.

³ Table 615 <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

- 3.19 As the Urbed report points out, this source illustrates how shifts in the wider market can influence the supply of housing. The Urbed report suggests using vacant office floorspace and converting this to housing using assumptions around gross-to-net ratios and assuming 70 sqm per unit.
- 3.20 However, in Wealden, as set out in the “Employment and Economic Study: Eastbourne and Wealden”, there is low demand for office premises and this is caused by increased conversion to other uses principally residential. As a result, the vacancy rate is low, arguably too low, and there is a need to increase this to allow for churn in the market. It is also not possible to split the vacancy rate out to exclude Grade A space and newly built office space as the guidance suggests.
- 3.21 While not ideal, we have therefore used past trends to examine the potential supply from this source. As Urbed explain, this source “also tends to be made up of a small number of relatively large developments so that it is not well suited to these studies”. But given the alternative and discounting later in this process, it is considered reasonable to do so.
- 3.22 The table below shows that 99 dwellings per annum are provided through the conversion of existing commercial and agricultural premises, while a further 81 dwellings per annum are provided from the demolition of commercial and agricultural premises and the rebuilding of dwellings.

Table 3.4 Supply of Net Dwelling from Commercial and Agricultural Buildings

	Conversions and/or Change of Use of Existing Business uses/ Agricultural uses (Net Dwellings)	Redevelopment of Business uses and Agricultural Buildings *
2013-2014	92	103
2014-2015	56	63
2015-2016	135	58
2016-2017	99	157
2017-2018	88	18
2018-2019	111	111
2019-2020	58	73
2020-2021	110	127
2021-2022	71	55
2022-2023	171	48
Total	991	813
Average	99	81

Source: WDC, 2024 *demolition and rebuild

- 3.23 If these trends were to continue over the 16.5 years of the Plan Period (to 2040) it would deliver a total of 2,977 dwellings.

Total Unconstrained Yield

- 3.24 Drawing each strand of supply together, we can see that there is a total urban capacity of 4,209 dwellings based on the mid-point density assumptions this increases to 4,639 dwellings if the upper-density assumptions are used. The breakdown of this supply is set out in the table below.

Table 3.5 Total Unconstrained Capacity Based by Density Assumptions

Source	Midpoint Density-based Capacity	Upped Density-based Capacity
UCS	992	1,422
Sub-Division of Existing Housing	101	101
Flat Over Shops	140	140
Empty Homes	0	0
Conversion of Commercial Buildings	2,977	2,977
Total	4,209	4,639

Source: Icen Projects and Urban Intelligence

- 3.25 It is not possible to break down this supply by location as some of the supply sources are based on past trends or general assumptions, which are not based on localities. However, the general distribution of capacity from these sites is likely to reflect the current distribution of homes and shops, with the largest settlements (i.e. Type 1 Settlements) likely to have the highest number of windfall sites.
- 3.26 We can therefore conclude that the unconstrained capacity (i.e. the theoretical total number of dwellings that it could accommodate if all of the potential capacity was developed optimally) of the district as identified by this report of between 4,209 dwellings and 4,639 dwellings. Although additional unconstrained capacity is also identified in the SHELAA.

Discounting the Supply

- 3.27 The Urbed guidance finally suggests that the unconstrained supply is discounted to “predict how much of this unconstrained capacity can be brought forward within the time horizon being considered”. It adds that:

“There will be good reasons why a proportion of the capacity identified earlier in a study will not come forward for development, or may not be capable of development immediately. For example, otherwise suitable sites or buildings identified in the earlier stages may not in practice be capable of being brought forward because of viability or ownership constraints that cannot be resolved in the foreseeable future”.

- 3.28 We have therefore sought to apply the following levels of discount. These are based on the ranges set out in the Urbed study:

- **UCS – 70%** - The UCS encompasses several sources of supply, so we have had to make assumptions based on a range of potential sources. While 70% is a substantial discount, it is at the lower end of the scale (70% - 85%) for many of the relevant sources including car parks, intensification and redevelopment sites and is also within the range for vacant and derelict land and buildings (65% - 85%). As an alternative to this the Council may wish to contact site owners to get a better understanding of these sites deliverability.
- **Sub-Division of Existing Housing – 25%** - Again this is the lower end of the range (25% - 40%) and reflects the fact that sub-division may accelerate in future as demand for rental properties increases as affordability and interest rates increase. It could also be potentially lower still as the capacity we have identified is based on the remaining 16.5 years of the plan period.
- **Flat Over Shops - 25%** - This is the lower end of the range (25% - 40%) and is chosen as we have already discounted the supply due to a shift from high street to out-of-town retail.
- **Conversion of Commercial Buildings – 80%** - This is the mid-end of the range (70% - 85%) as per the Eastbourne and Wealden Employment Land Review, there is low office demand and conversion should be encouraged. However, as we are using trend-based data we have discounted this above the minimum to reflect these shortcomings. It could also be potentially lower still as the capacity we have identified is based on the remaining 16.5 years of the plan period.
- **Empty Homes** – There is no capacity assumed. Therefore, discounting is not applicable.

Total Constrained Supply

- 3.29 Once the discount has been applied, we can see that there is a total constrained urban capacity of between 1,073 dwellings and 1,202 dwellings based on the mid-point and upper-density assumptions. The breakdown of this supply is set out in the table below.

Table 3.6 Total Constrained Capacity

Source	Mid-Point Density Capacity	Upper Density Capacity
UCS	298	427
Sub-Division of Existing Housing	75	75
Flat Over Shops	105	105
Empty Homes	0	0
Conversion of Commercial Buildings	595	595
Total	1,073	1,202

Source: Icen Projects and Urban Intelligence

Additional Sources of Supply

- 3.30 In addition to the sources of supply identified within this report, there are several other unquantified sources. This again draws on the Urbed report and those elements of the supply which have not been assessed herein. These are:
- 3.31 **Intensification of existing areas** – Parts of this source of supply will be picked up by estate renewal programme (of which there are none in Wealden District), while others will be picked up in the site identification process. The Urbed report recognises that other sources such as vacant sites, if looked at first (as is the case in Wealden) would make the contribution from intensification “relatively less significant”.
- 3.32 **Review of other existing allocations on plans** – We did not want to prejudge the plan-making process by including (or not) other existing allocations for other uses on previous local plans which may be carried over. However, through the plan-making process, the Council can reallocate these uses for housing. The exception to this is a small number of employment sites that the “Employment and Economic Study Eastbourne and Wealden” identified as surplus to the need, which have been included within the UCS process.
- 3.33 In addition, there will be further supply from rural communities including extensions from existing villages. We can also see that there may be some potential to derive capacity from extensions to Tunbridge Wells.
- 3.34 Finally, there is also a significant supply identified within the SHELAA, which when combined with the other sources will ensure a thorough examination of the potential supply of housing land within Wealden.

4. INCREASING THE RATE OF DELIVERY

- 4.1 This section sets out advice to the local authority on increasing the rate of delivery on large and small sites.

Delivering Large Sites

- 4.2 Sir Oliver Letwin's *Independent Review of Build Out*⁴ has explained and reported on ways in which the build-out rate on large sites can be improved. The report found that:

“if either the major house builders themselves, or others, were to offer much more housing of varying types, designs and tenures including a high proportion of affordable housing, and if more distinctive settings, landscapes and streetscapes were provided on the large sites, and if the resulting variety matched appropriately the differing desires and financial capacities of the people wanting to live in each particular area of high housing demand, then the overall absorption rates – and hence the overall build out rates – could be substantially accelerated.”

- 4.3 A key conclusion drawn from the *Review* was a need to increase diversity in the products delivered on large sites, and diversity in those who are building homes. Housing diversity is described as housing of differing type, size, style, design, and tenure mix; and includes housing sold/let to specific groups such as older persons housing, students, and self/custom-build homes. Letwin recommended that each phase of the development should be subject to housing diversity requirements – including different housing products, types, tenures and styles.

- 4.4 Iceni's view is that the principle set out in the Letwin Review of diversity in the overall scheme, and where appropriate by phase, is right and will help to support build-out rates. As part of the master planning process of large sites, the following issues should be considered:

- Sales outlets – the potential to support multiple sales outlets at different locations within the development scheme, as part of each phase. The Council should look to encourage at least 2 access points (e.g. from the North and South) to large sites and 4+ sales points from an early point in the scheme's delivery.
- Product differentiation – ensuring that these sales outlets can offer a level of differentiation between the market housing 'product' being offered to limit competition and boost sales rates.

⁴ <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

- Integrated affordable housing – integrating affordable housing within development phases, as this is catering for a different market/target group from the ‘for sale’ housing. The relatively high proportion of affordable housing in the scheme should help in these terms to support the build-out rate.
- Catering for Different Market Segments – with elements of the scheme catering for different specialist market segments, such as build-to-rent; older persons accommodation; student/graduate housing; and self-custom-build development. There would be a benefit to encourage a promoter to design the scheme such that the potential of these markets can be tested within earlier phases, providing market evidence that then supports further investment in later phases of the scheme.

- 4.5 Icení considers that these issues need to inform and be embedded within the masterplan for the development of large sites as a general rule, and there needs to be clear planning policies addressing product diversity within the relevant planning document which apply not just to the outline planning application; but which inform and guide delivery thereafter.

Delivering Infrastructure Upfront

- 4.6 Infrastructure delivery will also support the build-out rate. Fundamentally people want to live in a place, rather than a building site and thus early delivery of the local centre, a primary school and other social infrastructure can help to improve sales rates. Similarly, the accessibility of the site and the quality of public transport links can help to increase its attractiveness as a place to live. Investments in key infrastructure such as this, and placemaking more generally, which helps to make the site a more attractive place to live; and to give people a clearer impression of the place, will help to increase market sales rates and thus the build-out of the scheme.
- 4.7 There is a potential role for public funding in helping to support the early delivery of infrastructure which can have benefits both in terms of increasing sales volumes and supporting market values (and thus the viability of the scheme).
- 4.8 A report by Savills on the Value of Placemaking⁵ has shown that upfront “placemaking investment” – including through bringing forward the delivery of social and community infrastructure – makes the development more appealing and has a positive effect on both the pace of sales/delivery and residential values (and thus ultimately the residual land value). In the theoretical example given, an

⁵ <https://pdf.euro.savills.co.uk/uk/residential---other/spotlight-the-value-of-placemaking-2016.pdf>

increased infrastructure investment upfront of £15,000 per unit supports a 50% increase in sales rates and a 20% increase in sales values.

- 4.9 The report however demonstrates that to support this upfront investment requires 'patient capital' whereby essentially land is paid for over time rather than upfront creating more financial capital to invest in place.
- 4.10 The delivery of infrastructure within early phases of development can also help to create place and underpin demand. Savills research shows that investment in schools is particularly important as they can provide an immediate draw to the development attracting potential buyers, but also help to create footfall. Retail shops, services and local community facilities also need to be delivered hand-in-hand with the development of large sites.
- 4.11 The Council (and indeed the County Council) might wish to consider how it leverages its resources to contribute to early infrastructure delivery to support the creation and success of new development schemes.

Modern Methods of Construction

- 4.12 Modern methods of construction relate to homes built using a high proportion of components which are produced using modern and technologically driven methods of manufacture, with this production often taking place offsite and the components then assembled on-site.
- 4.13 Through using a high proportion of precision-manufactured components, materials and manufacturing systems, housing delivered in this way can be of a superior quality to that delivered through traditional construction methods. It can also achieve better energy performance; can reduce the effects of site deliveries, noise and pollution by shortening the construction period and thus reducing disruption to local communities; and can require lower levels of workers, helping to mitigate and manage the potential effects of construction skills shortages.
- 4.14 To a degree, there has historically been a level of stigma associated with 'prefab' homes with the perception being influenced by the perceptions of the 150,000 homes delivered as part of post-war reconstruction through the Emergency Factory Made Homes Programme. However, in other countries, the situation is quite different – in Sweden for instance it is estimated that up to 90% of homes are factory-built, and factory-built homes have a reputation for higher quality, efficiency and sustainability. BoKlok – a joint venture between Skanska and Inter Ikea has delivered 10,000 high-quality but affordable homes.
- 4.15 In the UK, there are a range of bodies which have recently set up factories to deliver modular construction. This includes Berkeley Homes, which has built a 160,000 sq. ft factory in Kent, which

can deliver 1,000 homes a year. Legal and General, which owns housebuilders such as CALA, has a modular division and has opened a factory near Leeds, which is capable of producing 3,000 homes a year. A key issue for these companies is maintaining a pipeline of work as the volume of delivery is an important component of the efficiencies which can be achieved by the model.

Utilising Delivery Tools

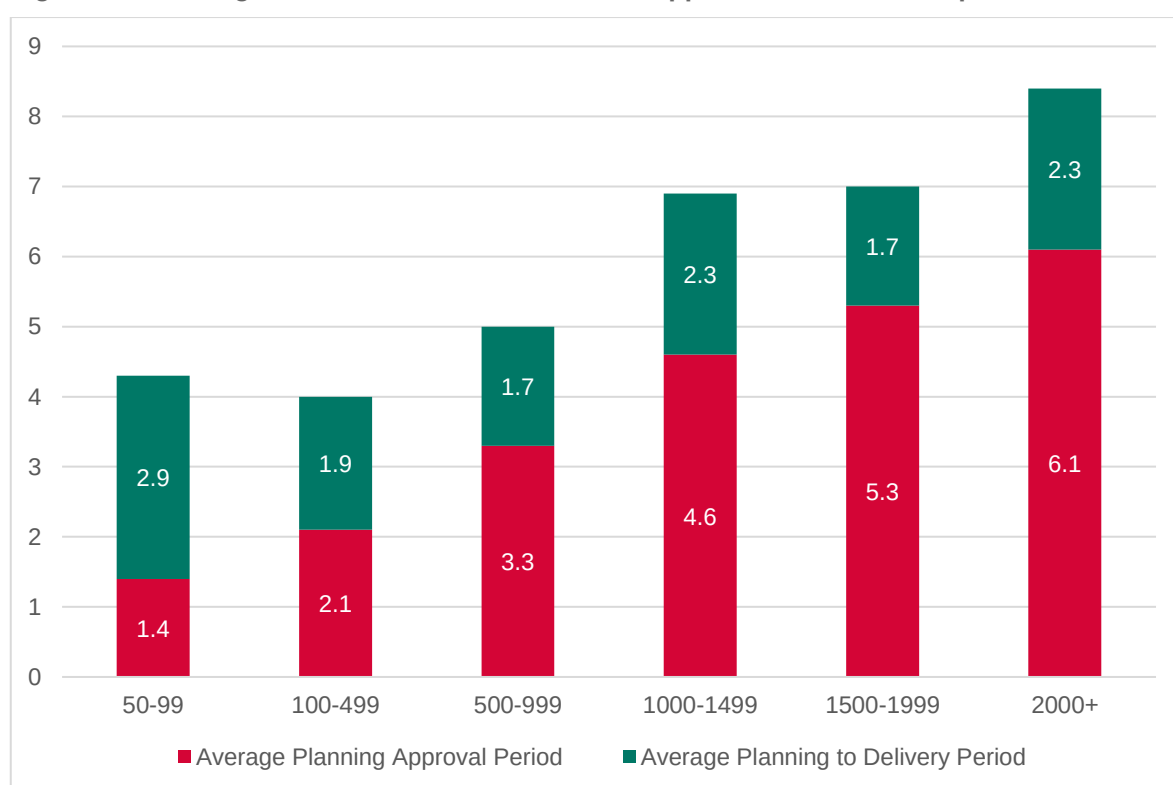
- 4.16 The Council also has several “tools” which can be used to boost the availability of land and bring forward development quicker. One tool that could be utilised is Local Development Orders (“LDO”), which provide permitted development rights for specified types of development in defined locations.
- 4.17 They are a flexible and locally determined tool that a Council can use to help accelerate the delivery of appropriate development in the right places. LDOs can help enable growth by positively and proactively shaping sustainable development in their area. They can play an important role in incentivising development by simplifying the planning process and making investment more attractive. They can also be used to free up resources by granting planning permission for uncontentious minor development. They might also be used to drive reinvestment in struggling town centres by facilitating the diversification of uses.
- 4.18 LDOs provide the Council with the opportunity to shape the development of appropriate sites/areas in more detail than might be facilitated through a Local Plan, site allocation or planning brief. The Government are keen to encourage this freedom to be exercised by the Councils, allowing them to creatively plan for development in their area that meets local social, economic and environmental priorities, whilst also addressing critically important national objectives. This is an advantage that Councils have afforded to them and one that should be embraced.
- 4.19 Another tool could be area-wide design guides which can be tied into the masterplanning process of large sites. Through establishing a design guide upfront and through joint work with landowners and developers in the masterplanning process, planning applications are more likely to be approved and commence delivering earlier in the plan period. This would define and deliver design quality, in addition to local design guides, planning briefs, heritage characterisation studies, standards and masterplans as set out in the Framework and the PPG.
- 4.20 The Council could also look to use Planning Performance Agreements (“PPA”) to encourage early pre-application engagement on large sites and avoid unnecessary delays around design, scale, etc. when determining applications. This would also ensure that individual reserved matters applications are determined in a timely fashion and the Council could use regular meetings aligned with the PPA to co-ordinate the submission of applications on smaller parcels, which could in turn deliver quicker.
- 4.21 It will be sensible for the Council to carefully consider what pre-commencement conditions will be necessary to attach to outline planning permissions, limiting it to those which are required; and to

ensure that the process of discharging conditions is adequately resourced by the Council to support the timely delivery of large sites.

Large Site Delivery Assumptions

- 4.22 Icení has reviewed Lichfields' Start to Finish research⁶ to provide context around realistic lead-in times and reproduced the analysis on average timeframes from validation of the first application to completion of the first home in the Figure below. The Lichfields research is a national study which has considered the typical lead-in time and build-out rate for different sizes of sites across England.

Figure 4.1 : Average Timeframe from Validation of Application to First Completions



Source: Lichfields Start to Finish, Figure 4

- 4.23 As is clear, the average time from validation of an outline planning application to the delivery of the first home for large sites of 500+ homes ranges from 5 to around 8.5 years depending on the size of the site. This shows the significant length of time it can take to get larger sites delivering. For sites of 100-500 homes, the average lead-in time is 4 years.
- 4.24 The Council should aim to review the lead-in times of large sites set out in the housing trajectory with this national research borne in mind, but also through detailed one-to-one discussions with

⁶ Start to Finish, Lichfields (February 2020)

landowners and developers. Invariably, local evidence and site-specific assumptions will be preferable over national research; however, any assumptions should be sense-checked using Start to Finish. The Council has produced local evidence on lead-in times for housing sites within its latest Five-Year Housing Land Supply Statement⁷.

Delivering Small Sites

- 4.25 The delivery of small sites is particularly important for any local authority. Small sites are often critical to ensuring the Council has a healthy five-year housing land supply as they can come onstream without the need for any significant infrastructure and are almost always delivered in full in the five years. They provide essential “churn” in overall delivery and can be delivered quickly.
- 4.26 In policy terms, it is going to be particularly important that the Council provides a clear policy framework which encourages smaller house builders to bring forward infill development and intensification opportunities. The Local Plan will also need to recognise that the density and character of existing residential areas may need to evolve and articulate how this can be achieved.
- 4.27 The Framework (paragraph 135c) sets out that policies and decisions should be sympathetic to local character and history, but that this should not, per se, prevent or discourage appropriate innovation and change (such as increasing densities in existing residential areas). In this context, the Council could use this study to identify opportunities within the character areas for intensification. It could also guide development principles about height, massing and materials for each character area.
- 4.28 The Council could also prepare a Small Sites Toolkit that will provide design guidance for future development on small sites in the district. This could guide specific forms of development, including extensions to properties, redevelopment of larger family homes, garden or back land development and corner plots.
- 4.29 In key areas for change, there is a role for the Council in preparing masterplans which bring together the community, developers, site promoters and other key stakeholders to identify development proposals and set out a place-specific framework to coordinate major change. This ties in with the tools we have set out above relating to large sites.

A Direct Role for the Council

- 4.30 The Council should consider its role as a landowner within the district. The Council already owns and manages a variety of land and property assets - the portfolio of landholdings is extensive, ranging

⁷ [Five Year Housing Land Supply Statement – as of 1st April 2023, December 2023](#)

from small parcels of amenity land to Commons and the Cuckoo Trail. Properties range from shops and industrial units to historic monuments and Leisure Centres.

- 4.31 This study has identified opportunities to develop sites for housing which are currently in alternative use, including underutilised sites. The Council could also investigate opportunities to ‘package up’ a portfolio of small site opportunities in a particular neighbourhood, which it could then present to an SME or Registered Provider as a portfolio, which achieves a critical mass to justify investment across the portfolio.
- 4.32 Packaging up small site opportunities should help to spur developer interest and de-risk development because of economies of scale. The Council could take this forward alongside a development partner, particularly given the strength of community feedback generated in the poll for developing across small sites.
- 4.33 In areas where land ownership is fragmented in the district, it is also likely that there are few larger development opportunities. But against this context, there may be further opportunities for the Council to act proactively to assist in the assembly of larger development opportunities in areas which it identifies as key areas of change, including through acquiring land and where necessary use of Compulsory Purchase Order (“CPO”) powers, to facilitate regeneration and growth.

Calculating a Windfall Allowance

- 4.34 As part of boosting overall supply and the supply of small sites in particular, it is important to consider whether a windfall allowance is justified. The Framework states that a windfall allowance may be justified if an authority has compelling evidence that it will provide a reliable source of supply. The Council have calculated this as part of the appendices to the SHELAA.
- 4.35 This source includes permitted development rights which will see vacant office buildings demolished and rebuilt them for residential uses. While this is expected to continue to be a reliable source of housing moving forward there may be some double-counting with the supply identified herein, particularly sub-division and conversion of commercial buildings sources. It should therefore be further discounted when bringing these sources together.