Wealden District Council

Spatial Strategy Topic Paper

Wealden Draft Local Plan (Regulation 18)

March 2024

Wealden
District Council

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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 local plan for Wealden District at the Regulation 18 stage. This topic paper explains the spatial strategy set out in the 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).

1.2 This topic paper supports the first statutory stage of preparing the draft Local Plan, which is known as the Regulation 18 stage. The Regulation 18 Local Plan is a comprehensive local plan that covers strategic policies for the district, as well as non-strategic policies and site allocations. As part of the emerging local plan at the Regulation 18 stage, the Council has produced a draft spatial strategy and settlement hierarchy. Following public consultation for the Regulation 18 local plan, we will consider the feedback received to refine the draft local plan, including its spatial strategy as well as test the spatial strategy and spatial options further.

1.3 This topic paper will be revised and updated at each 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 Process (EIP). 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.

<u>Spatial Portrait of Wealden</u>

1.4 The Council's emerging local plan aims to deliver sustainable development across the district. In order to understand the rationale for the spatial strategy presented in the Regulation 18 local plan, it is necessary to have an understanding of the district's geography and demographics.

1.5 Wealden is a large, rural district, encompassing a high number of settlements and communities. It has a dispersed and varied settlement pattern with several larger market towns, villages and hamlets scattered across the district from the south coast at Pevensey Bay to the urban edge of Royal Tunbridge Wells to the north of the district. The district is bordered by three other counties (West Sussex, Kent and Surrey) and eight other local authorities, including the South Downs National Park (SDNP) that incorporates part of the district. The regional context for Wealden is illustrated below.

Figure 1: Regional Context Map for Wealden District



1.6 Historically, five main towns are identified within Wealden that includes Crowborough, Hailsham, Heathfield, Uckfield and Polegate. Unlike other local authority areas, Wealden is not dominated by any one of its towns and overall, it is a district of many centres. In addition, there are several larger settlements that adjoin the district boundaries, such as Eastbourne to the south and Tunbridge Wells to the north, as well as other large towns and cities that lie in close proximity to Wealden (i.e. Bexhill/Hastings, East Grinstead/Crawley, Lewes/Brighton and Hove). These larger settlements outside the district exert a significant influence on Wealden particularly in terms of providing jobs, health care, leisure, further education and shopping. This is both a benefit to our communities but also a disadvantage given that the district's smaller market towns are in competition with these larger centres.

1.7 In terms of Wealden's population, the population size has increased by 7.5% from around 148,900 in 2011 to 160,100 in 2021. This is higher than the overall population growth in England that was only 6.6% over the same period but is in line with the growth rates for the wider southeast region. The Census for 2021[1] also confirms that 50.5% (or 81,350 people) of Wealden's population live within the town/parish boundaries of the five main towns of the district, with a further 14.1% (or 22,780) of the district's living in the largely urban areas that surround Eastbourne and Hailsham[2]. The remainder of the population (35.4%) lives within rural areas or in larger villages that are scattered throughout the district.

1.8 The challenge for the emerging local plan is to focus growth where it is most accessible and sustainable, whilst continuing to maintain the rural settlement pattern and ensuring that the facilities and services within towns and villages are supported for the wider community. In less sustainable locations, additional growth may simply encourage more travel by private motor vehicle and out-commuting, which would negatively impact the Council's ability to tackle climate change.

1.9 In terms of the natural environment, the district is covered substantially by national landscape designations including the High Weald National Landscape that covers 53% of the district and surrounds two of the district's major towns (Crowborough and Heathfield), as well as washing over several larger villages (i.e. Wadhurst and Forest Row). Over 7% of the district falls within the SDNP (south of the A27) and is therefore outside the jurisdiction of

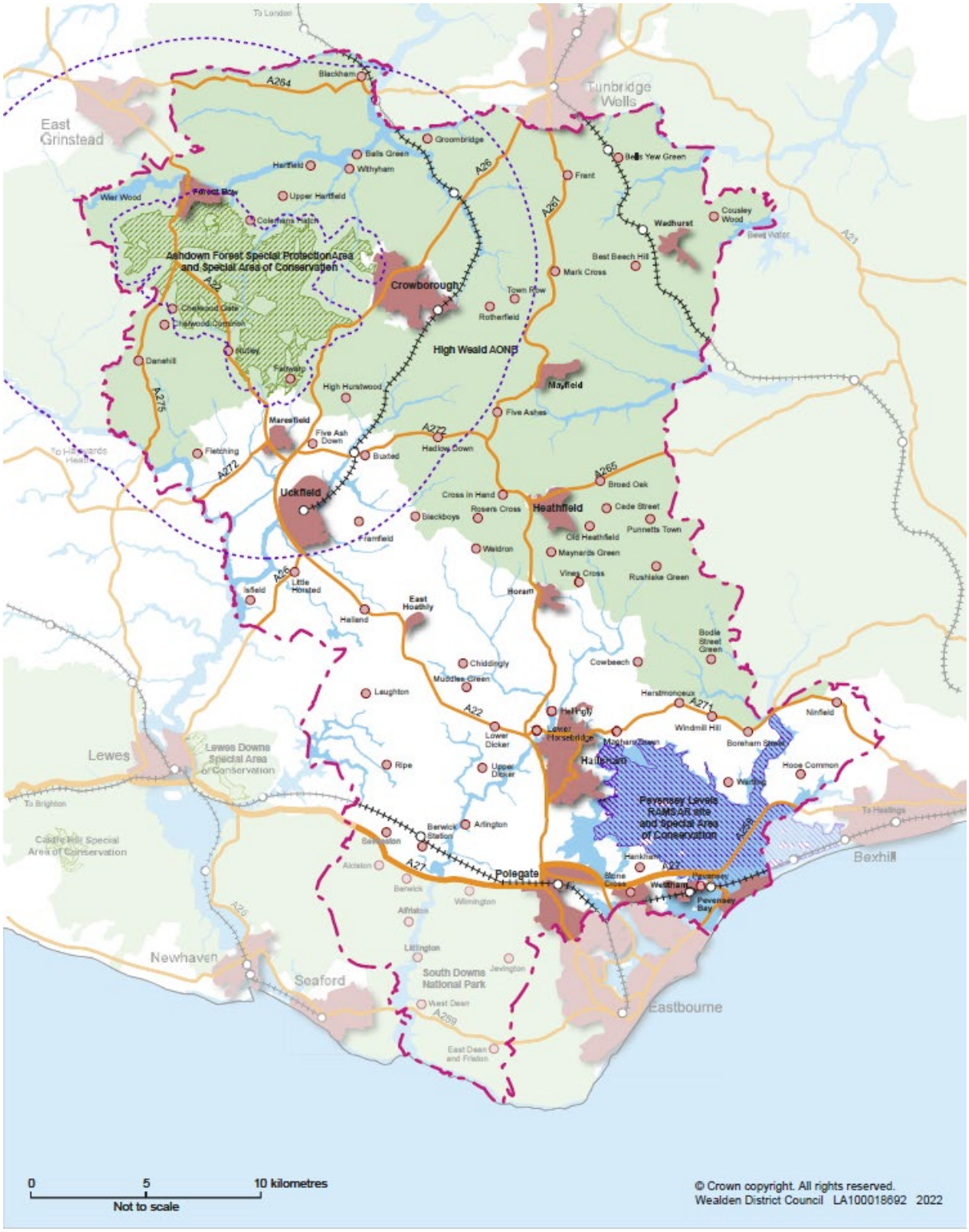
[1] Census 2021, Parish Data

[2] This includes the Parishes of Hellingly, Pevensey, Westham and Willingdon and Jevington.

Wealden District Council for planning purposes. Together, this represents over 60% of the district being recognised nationally for its landscape quality.

1.10 Wealden District also contains the Pevensey Levels Special Area of Conservation (SAC) and Ramsar Site in the southeast of the district, as well as the Ashdown Forest SAC and Special Protection Area (SPA) in the northwest of the district. There are also substantial fluvial flood risk issues in the district, which is most notable in the Pevensey Levels, posing a risk to Hailsham, Westham and Pevensey, but there are also threats from rivers in Uckfield, Crowborough, Forest Row and Horam as well as in rural parts of the district. The location and scale of future development will need to account for its potential impact on all these designated areas. A map showing the constraints of the district is provided below.

Figure 2: Constraints Plan for Wealden District



2. National and Local Policy Context

National Policy Context

2.1 All local planning authorities in England are required to address the requirements set out in national planning guidance for preparing their local plans, which includes the National Planning Policy Framework (NPPF) last published in December 2023 and the Planning Practice Guidance (PPG)[3].

National Planning Policy Framework (NPPF)

2.2 The purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 of the NPPF confirms that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. The three objectives are as follows:

- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

2.3 Paragraph 9 of the NPPF confirms that planning policies should play an active role in guiding development towards sustainable solutions, but in doing so, should take local circumstances into account, to reflect the character, needs and opportunities of their area.

2.4 At paragraph 11 of the NPPF, it states for plan-making that:

[3] Planning Practice Guidance (PPG)

a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area[4]; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

2.6 Paragraph 20 of the NPPF confirms that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

a. housing (including affordable housing), employment, retail, leisure and other commercial development;

b. infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c. community facilities (such as health, education and cultural infrastructure); and

d. conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

2.7 Paragraph 22 of the NPPF confirms that strategic policies should look ahead over a minimum 15-year period from adoption[5], to anticipate and respond to long-term requirements and opportunities, such as those arising from major

[4] This includes habitat sites (as listed in paragraph 187 of the NPPF) and/or designated Sites of Special Scientific Interest (SSSI); land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park or defined as Heritage Coast; irreplaceable habitats; designated heritage assets and areas at risk of flooding or coastal change.

[5] Except in relation to town centre development that is discussed separately.

improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

2.8 Paragraph 35 of the NPPF states that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are considered 'sound' if they are:

a. **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs[6], and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b. **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c. **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d. **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

2.9 Paragraph 74 of the NPPF confirms that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). In identifying such sites, local planning authorities should:

a. consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

b. ensure that their size and location will support a sustainable community, with sufficient access to services and employment

[6] Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 61 of the NPPF.

opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

c. set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community; and

d. make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation.

2.10 Paragraphs 82 and 83 of the NPPF relates to rural housing and notes that planning policies should be responsive to local circumstances and support housing developments that reflect local needs, including affordable housing. It also notes that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

2.11 Paragraph 87 of the NPPF in relation to economic development advises that planning policies should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters of networks of knowledge and data-driven, creative or high technology industries, and for storage and distribution operations at a variety of scales and in suitably accessible locations.

2.12 Paragraph 88 of the NPPF confirms that planning policies should enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

2.13 Paragraph 90 of the NPPF states that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. It states further that local planning authorities should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. It also recognises the role that residential development plays in ensuring the vitality of centres.

2.14 Paragraph 109 of the NPPF confirms that the planning system should actively manage patterns of growth in support of these objectives. It notes that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. However, the NPPF recognises that opportunities

to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account for plan-making.

2.15 Paragraph 110 of the NPPF states that planning policies should support an appropriate mix of uses across the area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

2.16 Paragraph 123 of the NPPF states that planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. This should include ways that makes as much use a possible of previously developed or 'brownfield' land.

2.17 Paragraph 165 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

2.18 Lastly, paragraph 182 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. It notes that the scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Planning Practice Guidance (PPG)

2.19 The PPG[7] confirms that plans should set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.

2.20 The PPG[8] also outlines that local planning authorities preparing local plans should assess future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach (except where this has already been dealt with through a spatial development strategy). This involves gathering evidence, carrying out a SA to inform the

[7] Paragraph: 001 Reference ID: 61-001-20190315

[8] Paragraph: 034 Reference ID: 61-034-20190315

preparation of local plans and effective engagement and consultation with local communities, businesses and other interested parties.

Local Policy Context

South East Local Enterprise Partnership – Economic Recovery and Renewal Strategy[9]

2.21 The South East Local Enterprise Partnership (LEP) has recently published an Economic Recovery and Renewal Strategy for the local region that includes East Sussex, Kent and Essex. The main four strategic priorities for this Plan are as follows:

- *Business Resilience and Growth* – this primarily relates to supporting start-up businesses, R & D and innovation activities, developing a highly skilled workforce, moving to a net zero economy and supporting people transitioning between and across sectors;
- *UK's Global Gateway* – this primarily relates to supporting the successful implementation of freeports and to build on the strong record of inward investment in the area and maximising new trade deals;
- *Communities for the Future* – this primarily relates to working with the private development industry to strengthen links with the private sector in order to deliver well designed community development that protects and enhances our natural resources;
- *Coastal Catalyst* – this primarily relates to addressing gaps in digital infrastructure, facilitating greater connectivity, supporting coastal and rural businesses, as well as addressing the impacts of poorer physical connectivity on coastal and rural economies.

2.22 Although there is no specific spatial component to this strategy that impacts Wealden, this does impact on key issues affecting Wealden, such as the rural economy, visitor economy, upskilling the existing workforce, the net zero economy and the delivery of new successful communities.

Transport for the South East – Transport Strategy for the South East[10]

2.23 The Transport Strategy for the South East was published in 2020 and was prepared by Transport for the South East, which is a sub-national transport body for the South East of England, with support of its 16 constituent local

[9] South East Local Enterprise Partnership – Economic Recovery and Renewal Strategy, March 2021

[10] Transport for the South East – Transport Strategy for the South East (June 2020)

transport authorities, five LEPs, as well as 46 district and borough councils and wider key stakeholders.

2.24 The plan's strategic vision is as follows:

'By 2050, the South East of England will be leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step-change in connectivity and environmental quality. A high-quality, reliable, safe and accessible transport network will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life.

2.25 The plan also sets out its three strategic goals as:

- Economic – Improve productivity and attract investment to grow our economy and better compete in the global marketplace;
- Social – Improve health, safety, wellbeing, quality of life, and access to opportunities for everyone; and
- Environmental – Protect and enhance the South East's unique and historic environment.

2.26 The plan identifies several challenges that featured transport infrastructure in Wealden, which includes capacity along the A27/A259/East Coastway Corridor, secondary routes for radial and orbital roads (e.g. the A22) that fall below standards in places, as well as the need for better rail connections between the south and north of the district and onto London (i.e. the reinstatement of the Uckfield to Lewes rail link).

East Sussex Economy Recovery Plan: East Sussex Reset (September 2020)[11]

2.27 The East Sussex Economy Recovery Plan 'East Sussex Reset' aims to build sustainable prosperity for our businesses, voluntary, community and social enterprise sectors, and support residents to access new opportunities that drive economic recovery and resilience. The Economy Recovery Plan focuses on businesses, skills and employment in a post Covid-19 landscape.

2.28 The plan identified six missions to support the East Sussex economy and livelihoods. Each one aims to go beyond just recovery to reset the opportunities for businesses, employers and employees while improving the local infrastructure and environment. Each mission is below:

- Mission 1: Thinking local, acting local;

[11] East Sussex Economy Recovery Plan: East Sussex Reset (September 2020)

- Mission 2: Building skills, creating jobs;
- Mission 3: Fast-forwarding business;
- Mission 4: Better places, fuller lives;
- Mission 5: Cleaner energy, greener transport; and
- Mission 6: The future is digital.

The Wealden District Council Strategy[12]

2.29 The Wealden District Council Strategy sets out several objectives to guide the work of the Council and its investment priorities. The three key strategic priorities of focus are as follows:

- *Climate change and our environment* – Protecting our environment and leading the district towards carbon neutrality.
- *Community resilience and wellbeing* – Building strong, mutually supporting communities which are actively engaged in their own future.
- *Local Economy* – A growing economy which enables people to live well.

2.30 Each of the Council's three key priorities have a number of objectives listed below that will support those key priorities. The Council's emerging local plan will help to deliver the spatial aspects of the Wealden District Council Strategy shaping the pattern, type, scale and location of growth within the district. In particular, the local plan:

- will seek to ensure that local facilities, amenities and services are sustained in close proximity to where residents live;
- retain and enhance areas of national and/or international landscape/biodiversity importance;
- facilitate the move towards a net zero economy;
- support the economy through the allocation of new employment floorspace within the district; and
- support the viability and vitality of our existing town and village centres.

[12] The Wealden District Council Strategy

Wealden Economic Development Strategy 2023-2033[13]

2.31 In 2023, the Council published its Economic Development Strategy for the 2023-2033 period. This outlines that Wealden has a diverse economy characterised by a high number of Small to Medium Sized Enterprises (SMEs) and a highly qualified workforce, but Gross Value Added (GVA) and jobs growth has been below the national average over the past decade. It also confirms that town centres and high streets have shown resilience during Covid-19, but there remains continuing challenges in terms of the increased cost of doing business, cost of materials, goods and energy, maintaining vibrancy, attracting visitors and retaining commercial floorspace.

2.32 The strategy sets out five priority themes, which reflects Wealden's unique characteristics as a place. These are set out below:

a. For Wealden's town centres to adapt to residents and visitor's needs, providing places to work, socialise and enjoy, whilst optimising dwell time and spend.

b. Enterprising Wealden to maintain a resilient and growing business base to ensure business and employment opportunities for all.

c. Skills and employment to support the existing and future workforce, whilst helping to enable partners and employers to develop robust working practices to success.

d. Support tourism sector by increasing overnight stays and visitor spend, whilst promoting Wealden as an attractive place to visit.

e. Net Zero Wealden: to support the development of, and opportunities arising from the transition to net zero, and ensure our businesses are ready for the impact of climate change.

Wealden Housing Strategy 2020-2025[14]

2.33 Wealden's Housing Strategy was published in 2020 and identifies that its key priorities are to increase housing supply, improve housing quality and provide housing support and advice for the district. The strategic objectives identified are underpinned by the following key principles:

- Reducing inequality – making sure that services are welcoming and responsive to the needs of Wealden's whole community.
- Improving neighbourhoods – making sure services contribute to creating safe sustainable communities.

[13] Wealden Economic Development Strategy 2023-2033

[14] Wealden Housing Strategy 2020-2025

- Accountability to local people – making sure services contribute to creating safe and sustainable communities.
- Value for money – making sure services are efficient and provide maximum impact.
- Partnership working – making sure the Council works with other agencies that can help improve the quality of life for residents in the district.

2.34 The Housing Strategy is reviewed on an annual basis and will be updated again in 2024/25 to ensure that it is in line with the priorities laid out in the Wealden District Council Strategy.

Wealden District Council Climate Emergency Plan[15]

2.35 On the 24 July 2019, Wealden District Council unanimously approved a motion to declare a Climate Emergency. In addition, the Council commissioned AECOM Limited to provide a Wealden District Council Climate Emergency Plan that was published in December 2019. This identified 43 actions that can be implemented to respond to the Climate Emergency. The actions cover both things that we can do as a Council to reduce our own emissions, and things that we can influence across the district. Those measure fall broadly under four categories:

- Energy efficiency standards in both existing and new buildings;
- An increased uptake of Low and Zero Carbon (LZC) technologies and battery storage within the Council's own stock;
- A modal shift in transport, along with the replacement of all existing petrol and diesel engine vehicles with low and zero emission vehicles; and
- Offsetting any remaining CO2e emissions, where the Council will need to explore additional measures, such as promoting carbon sequestration through sustainable woodland management or investing in large-scale renewable energy generation.

2.36 The Council's emerging local plan will aim to provide policies to address and counteract the effects of climate change, particularly through the design, location and technologies used for both existing and new buildings, as well as nature-based solutions.

2.37 The Council is in the process of developing a new Climate Change Strategy and Action Plan and it is important for our Local Plan to align with its goals

[15] Wealden District Council Climate Emergency Plan (December 2019)

and objectives. The Council are therefore working with consultants to progress our climate change evidence base which will inform both the new Climate Change Strategy and Action Plan and the Local Plan policies as these progress. In progressing our climate change evidence base, we will further test the below policy approaches and our options in order to understand how we can best address climate change in the Local Plan.

3. Key Local Issues and Evidence

The Adopted Local Plan

3.1 The Council's current statutory development plan consists of the adopted Wealden District Core Strategy Local Plan (February 2013)[16], the 'saved' policies of the adopted Wealden Local Plan (1998)[17] and the Affordable Housing Delivery Local Plan (May 2016)[18]. The Wealden District Core Strategy Local Plan (February 2013) has provided the latest spatial strategy for the district and contains the following policies, which are outlined in further detail below:

- Policy WCS1: The total provision for homes and jobs between 2006 and 2027;
- Policies WCS2 and WCS3: The distribution of housing, employment and retail growth over the 2006 to 2027 period in terms of which town/settlement; and
- Policy WCS4: Broad locations for future development across the district that were known as 'Strategic Development Areas' (SDAs).

3.2 Policy WCS1 (Provision of Homes and Jobs 2006 – 2027) outlines that Wealden District would provide for 9,440 (net) dwellings over the period 2006-2027 (or 450 dwellings per annum (dpa)) and that provision will be made for some net additional 40,000 square metres of employment floorspace and 17,000 square metres net additional retail floorspace over the same period.

3.3 The broad distribution of housing across the district is set out in policy WCS2 (Distribution of Housing Growth 2006-2027) and confirms that Hailsham and Hellingly are the focal point for housing growth at just under a third of total provision, with Uckfield, Polegate and Willingdon incorporating approximately another third of total housing provision. The remaining third of housing provision was to be distributed to the following settlements/parishes:

[16] Wealden District Core Strategy Local Plan (February 2013)

[17] Wealden Local Plan (1998)

[18] Wealden District Affordable Housing Delivery Local Plan (May 2016)

- Stone Cross and Westham;
- Crowborough;
- Heathfield and Waldron;
- Frant Parish (adjacent to Tunbridge Wells); and
- Rural villages

3.4 In terms of the distribution of employment and retail provision, policy WCS3 (Distribution of Employment (B Class) and Retail (convenience and comparison)) confirms that the retail provision would be split between Uckfield and Hailsham, whilst employment development is also expected in those towns, as well as Polegate, Willingdon and Stone Cross.

3.5 The spatial strategy for the Core Strategy (February 2013) endeavoured to focus development largely within the sustainable settlements of the Low Weald, albeit that some development was to come forward adjacent to Royal Tunbridge Wells, Crowborough and Heathfield and other rural areas, that are either within or within the setting of the High Weald National Landscape.

3.6 Policy WCS4 (Strategic Development Areas) outlines 11 broad locations for growth within Wealden District. It was noted that the exact extent and detailed form of the developments at these locations were not formally allocated as this was expected to be undertaken in the Site Allocations DPD that was to follow. However, a Site Allocations DPD did not materialise, and these Strategic Development Areas were not formally allocated. Nonetheless, most of the areas / sites identified in the adopted plan have since come forward (either commenced or with an extant planning permission).

3.7 Given the age of the Core Strategy (February 2013), all the policies within the plan and the spatial strategy are in need of review as part of the preparation of the emerging local plan. The emerging local plan at the Regulation 18 stage will look towards 2040. The new local plan will take account of up-to-date national planning policy and guidance, as well as local priorities, in order to develop a growth strategy that will support land for development in appropriate locations during the new plan period.

Neighbourhood Planning

3.8 The Localism Act 2011 provides communities a more direct way to shape development in their local areas, with the option of producing a Neighbourhood Development Plan (NDP). There are currently three 'made' NDPs in the district and others are at varying stages in the process[19] at the

[19] Full details of Neighbourhood Plans in the district can be viewed at the following weblink: https://www.wealden.gov.uk/planning-and-building-control/planning-policy/neighbourhood-planning/

time of writing. The three 'made' NDPs include Hailsham, Hellingly and Herstmonceux and none of these plans have sites allocated for development, albeit that NDPs can potentially identify sites for development. NDPs are an integral part of the statutory development plan for these areas and will be considered in the delivery of the spatial strategy.

Relevant Evidence Base Studies

Local Housing Needs Assessment (LHNA)[20]

3.9 A key element of the evidence base for Wealden is the Local Housing Needs Assessment (LHNA) that was commissioned by Wealden District Council and undertaken by Iceni Projects, being published in August 2021. 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. The study also considers the Housing Market Area (HMA) for Wealden District and its place within the wider sub-region.

3.10 The LHNA provides a local housing need assessment for Wealden District, which has been calculated using the 'standard method' calculation that is outlined in the NPPF[21] and PPG. The study considered this in 2020 and calculated the Council's housing requirement to be 1,225 dpa at that time. However, the Council has since revised this calculation as of 2023 (using the same method) and this results in a figure of 1,200 dpa. If this figure was to be extrapolated over the proposed Regulation 18 Local Plan period (1 October 2023 to 31 March 2040), this would mean a total housing need figure of 19,800 (net) dwellings.

3.11 The LHNA identifies the estimated amount of affordable housing needed within the district based on the PPG and confirms that the analysis suggests a need for approximately 519 affordable homes (rented) per year across the district, and moreover, 335 affordable home ownership dwellings per year across the district. This shows that there is an acute need for all types of affordable housing within the district.

3.12 The LHNA provides evidence of the 'housing market areas' that exist in the district in line with national planning policy. A 'Housing Market Area' (HMA) is defined within the PPG[22] as 'a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work'. Defining the HMA

[20] Wealden Local Housing Needs Assessment, August 2021

[21] See paragraph 61 of the NPPF.

[22] Paragraph: 018 Reference ID: 61-018-20190315

within the district can help to support decisions on where to provide new housing development and help guide the spatial strategy.

3.13 The study confirms that Wealden District is overlapped by five separate HMAs that includes the Eastbourne HMA, Coastal West Sussex HMA, the Northwest Sussex HMA, the Sevenoaks and Tunbridge Wells HMA and the Rother and Hastings HMA. The south of the district including, Hailsham and Polegate fall within the Eastbourne-focused HMA. The northern part of the district, including Heathfield and Crowborough are linked to Tunbridge Wells specifically. Collectively, this represents around 75% of Wealden's overall population, split relatively equally between these two HMAs.

3.14 The small rural area around Ninfield and Hooe consistently relates to Hastings and Rother HMA. The rural parts to the northwest of the district around Forest Row and Ashdown Forest relate to East Grinstead and more widely to the Horsham-Crawley HMA. The area where there is less consistency is around Uckfield with the data suggesting that the town and its surrounding area is in a zone of transition but is more closely linked to the Sussex Coast HMA (Lewes and Brighton) than anywhere else.

3.15 In short, Royal Tunbridge Wells to the north and Eastbourne to the south (outside of Wealden District), exert the most influence on the district.

Employment and Economic Study for Eastbourne and Wealden[23]

3.16 Both Eastbourne Borough Council and Wealden District Council commissioned Iceni Projects to undertake an Employment and Economic Study that was published in April 2022. The study identifies the Functional Economic Market Area (FEMA) for the area and provides forecasts for economic need[24] 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.

3.17 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. It was stated that given the uncertainty in the future outlook for office floorspace, a range was recommended from 3.1 to 6.8 hectares of office (ha) floorspace to be developed between 2019 and 2039. For industrial and warehousing development (i.e. Use Class B2 and B8), recent completions indicated a strong demand for industrial and warehousing units and losses have been

[23] Employment and Economic Study for Eastbourne and Wealden, April 2022

[24] This includes Use Class B2, B8 and office uses (Use Class E(g)).

limited. Despite these gains, the market remains strongly undersupplied. Therefore, it was also recommended that 48.3 ha (or 196,700 sqm) should be planned for up until 2039.

3.18 In spatial terms, it was 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.

Wealden Town Centre Study[25]

3.19 Wealden District Council commissioned Nexus Planning to undertake Wealden's Town Centre Study, 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 and town centre boundaries.

3.20 In terms of retail capacity, the Town Centre Study identifies the maximum floorspace capacity needed from its base date in 2021 to 2039. In terms of comparison goods capacity, by 2031, forecasts did not identify any capacity for new comparison goods floorspace over the next decade. For convenience goods, net quantitative 'capacity' for new convenience goods facilities in Wealden to 2031 is also limited and ranges between 1,600 and 2,300 sqm.

3.21 As such, whilst the study identified a quantitative need for new retail floorspace overall, the report does not consider there to be a distinct need and therefore recommended that the Council does not specifically allocate sites for new retail or commercial leisure facilities through the emerging local plan.

Strategic Housing and Economic Land Availability Assessment

3.22 The SHELAA is an essential piece of evidence which is required to support the local plan process. The application of SHELAA is considered in depth as part of the PPG[26]. The Council's latest SHELAA was published in February

[25] Wealden Town Centre Study, July 2022

[26] PPG: Housing and Economic Land Availability Assessment

2024[27]. It is a technical assessment which considers the availability, suitability and achievability of land in the district for possible development.

3.23 This evidence assists the Council in identifying what land in the district could be available to deliver housing, economic development, retail and other uses as applicable, which is then subject to a more detailed assessment. This more detailed assessment includes the site selection process, the SA, a Habitats Regulation Assessment (HRA), flood risk (i.e. sequential test), transport modelling and other infrastructure testing. Overall, the SHELAA forms an integral part of the local plan process providing the starting point for considering sites and an indication of site deliverability and capacity.

Local Transport Plan (LTP) 3 and 4

3.24 As the statutory Highway Authority, East Sussex County Council (ESCC) is required to have in place a Local Transport Plan (LTP). The current LTP (known as 'LTP 3')[28] sets out how ESCC plans to improve transport and maintain the roads between 2011 and 2026. The aim of the document is to develop an effective, well-managed transport infrastructure with improved travel choices. The high-level objectives of the plan are to:

- improve economic competitiveness and growth;
- improve safety, health and security;
- tackling climate change;
- improve accessibility and enhance social inclusion; and
- improve quality of life.

3.25 The fourth East Sussex Local Transport Plan[29] will replace the existing LTP 3 and will run from 2024 to 2050. An early consultation for this document took place between 31 October and 9 December 2022, with a further consultation on the draft LTP4 taking place between 27 November 2023 and 25 February 2024. The LTP4 once adopted will set out how ESCC plan to improve transport, deliver better access to jobs and services, including education, and create safer, healthier, more sustainable and inclusive communities. The new LTP will emphasise:

- inclusive engagement and decision-making;
- balancing the needs of rural and urban residents;

[27] Strategic Housing and Economic Land Availability Assessment (SHELAA), February 2024

[28] Local Transport Plan 3, East Sussex County Council

[29] Local Transport Plan 4, East Sussex County Council

- net zero carbon;
- health and wellbeing and social inclusion;
- opportunities and sustainable economic growth; and
- safety.

Wealden Local Plan Shared Transport Evidence Base (STEB): Assessment of Growth Options

3.26 As part of the process for developing the local plan, the Council is working with ESCC and other local authorities in East Sussex on a Shared Transport Evidence Base (STEB) in order to assess the potential growth options at this stage in the plan-making process. In terms of current key issues identified, the Wealden highway network, without additional growth proposed by the Regulation 18 Draft Local Plan, is currently approaching capacity in many key locations, although several junctions are subject to possible upgrade through the ongoing programmes by ESCC or Highways England. The following schemes are in progress, or have been completed in recent years:

- Hailsham/Polegate/Eastbourne Sustainable Transport Corridor Phase 1;
- A27 Improvements – Shared-use path stretching from Polegate to the junction with Firle Bostal;
- A27 Improvements – Berwick Roundabout Upgrade;
- A27 Improvements – Wilmington Junction Upgrade:
- A27/A2270 Polegate Junction Improvements;
- A27 link lane widening between A2270 and Cophall Roundabout; and
- A27 Station Road Drusilla's Roundabout improvements.

3.27 In terms of future works, highway improvements, particularly in the south of the district close to major growth that has taken place in recent years continues to be a priority. An outline business case for the A22 Major Road Network (MRN) junction improvement package was submitted to the Department for Transport (DfT) in 2019 for around £35m. The package of capacity improvements to five roundabouts will support housing and employment growth in the Eastbourne and South Wealden area.

3.28 However, due to the issues associated with the downturn in the wider economy (including inflation) and labour supply issues, as well as costs increasing for materials, the cost of the proposed MRN scheme has increased to £46.4m. There does remain a significant risk that if the MRN bid is not successful, that infrastructure funding requirements for these junctions would

further increase. Should this be the case, then alternate funding arrangements will need to be considered and sought. The outcome of the MRN bid is not yet known but is expected shortly.

3.29 The Council has also earmarked £2 million of Community Infrastructure Levy (CIL) receipts to support interventions required at the Ersham Road/Diplocks Roundabout Scheme, which are also identified as critical improvements required to support the current levels of growth. The Ersham Road/Diplocks Roundabout Scheme will also help deliver an improved village green within Hailsham, which would be accessible to all residents of the town via a direct link to the Cuckoo Trail.

3.30 However, despite such projects and improvements ongoing or in the pipeline, the high level of car ownership and car travel, coupled with identified gaps in sustainable transport infrastructure and poor connectivity in rural areas are key challenges within the district and the wider functional geography. In addition, funding transport schemes remains a key constraint and more funding as well as mitigation will be needed to support additional growth as well as address much wider strategic issues. The current LTP 3 identifies the following main highway infrastructure challenges with our district:

- Lack of high standard road infrastructure;
- Constraints to economic growth and improving transport connectivity;
- Poor road and pavement condition;
- Increasing levels of traffic growth;
- Uncertainty in future funding opportunities;
- Increasing numbers of housing growth across the county;
- Poor access to sustainable modes of transport an alternative to the car;
- South Wealden has a lack of good strategic connections;
- South Wealden suffers from high levels of local congestion; and
- Uckfield – highway network within the town is already very near capacity, resulting in town centre congestion issues, and it will struggle to accommodate a further increase traffic.

3.31 The STEB work has also identified varying levels of accessibility across the district. Overall, the work to date confirms that public transport provision is generally poor for most of the district with a higher than the national average use of the car as the primary method of travel. The key issues are below:

- The lowest levels of existing sustainable travel across East Sussex, with only 31% of internal Wealden trips made by non-private vehicle modes;
- The high proportion of commuters working outside the district makes sustainable travel initiatives and incentives hard to encourage, unless connectivity is improved cross-boundary;
- A high proportion (79%) of commuting between Wealden and Eastbourne is by car. Over 86% of trips to Lewes, Hastings, Rother, and other counties and 82% of all commuter trips into the district are made by car;
- Car ownership levels, 89% of households in Wealden have one or more cars. This is significantly higher than the national average (74%); and
- 50% of the population live in rural or remote areas and, except for Stone Cross, Westham, Pevensey, Wadhurst, Frant (at Bell Yews Green), Eridge and Buxted, many areas do not have direct access to rail connections or a frequent bus service.

3.32 In terms of potential issues identified because of the Regulation 18 Draft Growth Strategy, the capacity of the existing Strategic Road Network (SRN) A27 and MRN (A22 and A26) corridors to accommodate traffic resulting from development identified within the Regulation 18 local plan, even with a modal shift of 10% applied, remains and in some locations is already over capacity, (e.g. A22 Boship Roundabout). Table 1 below identifies the key SRN/MRN junctions that either have or will have capacity issues because of the growth strategy that forms part of the Regulation 18 local plan.

Table 1: SRN/MRN – Junctions capacity issues as a result of the Regulation 18 Growth Strategy

Road	Junction	2022 Capacity	2040 Capacity	Mitigation Required
A22	Boship Roundabout			Y
A22	Diplocks Way Roundabout			Y
A22	Eagle Roundabout			Y
A27/A22	Cophall Roundabout			Y
A27	A27/A2270 & A2270/Wannock Road Junctions			Y
A27/A22	Golden Jubilee Roundabout			Y
A22/B2247	Dittons Roundabout			Y
A295/A271	Roundabout			N
A295	Ersham Road Roundabout			Y
A22/A26	Little Horsted Roundabout			Y
A22/A26	Black Down Roundabout			Y
A22/B2210	Lewes Road Roundabout			N
A26	London Road			Y
A22/B2192	Halland Roundabout			Y
A22	Shaw Roundabout			Y
A22/B2124	Lewes Road			Y
A22/B2102	Copwood Roundabout			Y

Key:

	Exceeds 110% Capacity		At or approaching 90 – 110% capacity		Under 90% capacity

3.33 In short, the evidence base indicates that the levels of development growth anticipated in the Regulation 18 local plan, without mitigation, could result in severe impacts on parts of the A27, A22 and A26 and A2270 specifically. Even when taking modal shift into account, there are likely to be residual impacts on key corridors and key junctions. As part of the STEB model, initial concept designs have been assessed at these locations for mitigation; however, the level of impact on parts of the A22, north of Hailsham, the A27/A2270, between Wealden and Eastbourne, and A26 corridor, is likely to require further consideration in the countywide model, further option testing and the consideration of possible additional mitigation measures.

3.34 Transport modelling is and will continue to be an important aspect of determining the growth strategy for the district and equally, in identifying specific sites. Further transport modelling work will be undertaken prior to publication of the Regulation 19 local plan, including work around mitigation on these key junctions and the surrounding highway network to ensure that the local plan will not result in a severe impact on the highway network, both alone or in combination with other developments in nearby Districts and Boroughs.

Climate Change

3.35 The Council is in the process of developing its own climate change evidence base for the emerging local plan. Statistics[30] from the Department for Energy Security and Net Zero confirms that CO2e emissions have been falling steadily in Wealden from 2005 to 2020. In 2020, Wealden's greenhouse gas emissions totalled 516.3kt CO2e, which is a decrease of some 42.8% since 2005. This can largely be attributed to the decarbonisation of the national grid. However, as can be seen by the STEB work undertaken by the Council, the road network is widely used by residents and the majority of emissions come from road transport (55.6%) within Wealden, with domestic and commercial and industrial emissions accounting for 49.8% and 12.8% respectively[31].

3.36 In terms of total fuel consumption within the district in 2020, this equated to 260,900 tonnes of oil equivalent (ktoe), with the domestic sector accounting for 43.5% of total fuel consumed. The transport sector accounted for 37.4%, whilst industrial, commercial and other uses accounted for only 19.1%. Gas and petroleum consumption has been reducing since 2005, particularly in the

[30] UK local authority and regional greenhouse gas emissions national statistics, Department for Energy Security and Net Zero, June 2023

[31] It should be noted that land use, land use change and forestry (LULUCF) played an important part in reducing the district's emissions, with the removal of 137.6ktCO_2e in 2020.

domestic and road transport sectors, albeit they are both the primary methods of fuel consumption. The method of transport within the district is the most significant contributor towards greenhouse gas emissions in the district and therefore climate change, which means that the spatial growth strategy is key to reducing greenhouse emissions in the future.

Wealden Landscape Character Assessment (LCA) 2022[32]

3.37 The Wealden Landscape Character Assessment (LCA) provides a comprehensive and up-to-date strategic assessment of the district's landscape in terms of the physical and cultural influences that have shaped it and the perceptual qualities it possesses. The classification of the landscape within the assessment was undertaken at a scale of 1:25,000 and nests within the National Character Areas and the East Sussex Landscape Character Areas but is at a local scale and mapped to a finer grain of detail.

3.38 From the data gathered, six Landscape Character Types (LCTs) were identified and within these, 12 landscape character areas. The Wealden LCA provides a detailed discussion of the key characteristics of the LCTs and LCAs along with the forces for change and landscape guidelines should development come forward in the respective areas.

Wealden Landscape Sensitivity Assessment (LSA): Residential and Employment Development 2023[33]

3.39 This study focuses on the relative landscape sensitivity of different landscapes within the district (outside the National Park) to different types and scales of residential and employment development, in order to help inform decisions on the potential location of housing and employment growth, including the subsequent allocation of sites in the new local plan and to guide consideration of individual planning applications. The study adopts a two-step process to assess the sensitivity of the landscape at different scales:

- A strategic LSA assesses the sensitivity of the landscape across the district using the Wealden Landscape Character Assessment as a spatial framework; and
- A site-specific LSA assesses the sensitivity of the landscape of SHELAA sites submitted to the Council.

3.40 The LSA provides a sensitivity rating for each site, based on a number of criteria and judgements, together with detailed landscape mitigation guidelines for each site, should the site be considered within the local plan. This

[32] Wealden District Council Landscape Character Assessment, May 2022

[33] Wealden District Council Landscape Sensitivity Assessment: Residential and Employment Development, November 2023

evidence base helps to guide decisions of sites to allocate in relation to landscape impacts.

Wealden Landscape and Visual Appraisal (LVA): New Settlements and Large Urban Extensions 2023[34]

3.41 To help us consider options for growth in the district, the LVA assesses the suitability of potential large-scale development sites to accommodate growth (in landscape and visual terms), as well as determine any site-specific constraints and design considerations. For each potential development site, an analysis of the potential effects of development was undertaken. This included identification of the potential effects of development on landscape character and features, designated landscapes, existing settlement form and setting, visual amenity and cumulative effects as well as the constraints and opportunities in landscape terms for each site.

3.42 The suitability of the landscape across the potential development sites considered are summarised and illustrated with a constraints/opportunities plan with guidance on locations within each site where development could (if considered suitable and deliverable) be best accommodated in landscape and visual terms, together with advice on suitable mitigation measures (to avoid or minimise adverse landscape effects) and opportunities to enhance the landscape.

Wealden Landscape Sensitivity Assessment: Renewable Energy Development 2024[35]

3.43 The Council also commissioned Land Use Consultants (LUC) to undertake a landscape sensitivity assessment for solar photovoltaic (PV) and wind energy development. The report provides judgements on the landscape sensitivity of different parts of Wealden to these forms of renewable energy development. The findings of the study are intended to assist the Council to identify broad areas for renewable energy development, should this be taken forward, and to establish a local policy framework for such development in line with paragraph 160 of the NPPF.

3.44 The study comprises a criteria-based assessment, in line with the Natural England guidance on Landscape Sensitivity Assessment. This methodology highlights the specific landscape and visual characteristics that are most likely to be affected by renewable energy development. The LSA provides an indication of sensitivity across Wealden District, so that potential landscape

[34] Wealden District Council Landscape and Visual Appraisal: New Settlements and Large Urban Extensions, November 2023

[35] Wealden District Council Landscape Sensitivity Assessment: Renewable Energy Development, February 2024

opportunities and constraints can be considered in addition to the technical opportunities/constraints for these types of development.

Wealden Landscape and Visual Appraisal (LVA): Potential Development Sites in the High Weald AONB 2024[36]

3.45 Many sites submitted to the SHELAA process are located within the High Weald National Landscape. This LVA assesses the potential for these sites to accommodate development (in landscape and visual terms), as well as determine any site-specific constraints and design considerations.

3.46 For each potential development site, or groups of sites where sites are located adjacent to one another, an analysis of the potential landscape related impacts of development was undertaken. This included identification of the potential impacts of development on landscape character and features, existing settlement form and setting, visual amenity and the High Weald landscape.

3.47 The suitability of the landscape across the potential development site or group of sites is summarised, highlighting the key recommendations for accommodating development, with larger sites also having a constraints / opportunities plan with guidance on locations within the site(s) where development, if considered suitable and deliverable, could best be accommodated in landscape and visual terms.

Wealden Level 1 Strategic Flood Risk Assessment (SFRA)[37]

3.48 In line with the requirements of the NPPF, the Council (and Eastbourne Borough Council) has undertaken a Strategic Flood Risk Assessment for the district. These were published in May 2022 and included one for the North of Wealden and one for the South of Wealden incorporating Eastbourne. These reports set out a high level and strategic assessment of the risk of flooding from all sources (fluvial, coastal/tidal, surface water, groundwater, reservoir and sewer) within the district. This evidence helps the Council to identify land at the highest risk of flooding within the district so that development can be focused within those parts of the district at the lowest risk of flooding.

3.49 The SFRAs provide recommendations regarding all sources of flood risk in Wealden, which can be used to inform policy on flood risk within the emerging Local Plan. This includes how the cumulative impact of development should be considered. They also provide the latest flood risk data and guidance to inform the Sequential Test and provide guidance on how to apply the

[36] Wealden District Council Landscape and Visual Appraisal: Potential Development Sites in the High Weald AONB, January 2024

[37] Wealden District Council SFRA Level 1 (2022)

Exception Test. This information has been used by the Council to apply the Sequential Test to strategic allocations and identify where the Exception Test will also be needed (if applicable).

3.50 Fluvial flood risk is most notable on the Pevensey Levels to the southeast of the district but is also found to a lesser extent along the other four principal watercourses (Rivers Medway, Uck, Cuckmere and Shortbridge Stream), resulting in predicted flooding in Uckfield, Crowborough, Forest Row, Horam, Hailsham and Polegate as well as large rural areas.

Wealden Level 2 Strategic Flood Risk Assessment (SFRA)

3.51 As discussed above, paragraph 166 of the NPPF states that strategic policies should be informed by a SFRA and should manage flood risk from all sources. The Level 2 SFRA is necessary where land outside Flood Zones 2 and 3 cannot accommodate all the necessary development within a local plan. In these circumstances, the Level 2 SFRA should consider the detailed nature of the flood characteristics within a Flood Zone and assessment of other sources of flooding. The main objectives of the Level 2 SFRA are to:

- Assess the flood risk to potential development sites using the latest available flood risk data and climate change uplifts where available;
- Provide information and mapping to show flood risk from all sources for each site option;
- Provide recommendations for making the site safe from flooding throughout its lifetime where the Exceptions Test is required;
- Take into account, as far as practically possible the most recent policy and legislation in the NPPF, PPG and LLFA SuDS guidance; and
- Provide further assessment of cumulative development impacts on high-risk catchments as indicated in the Level 1 SFRAs.

3.52 The Level 2 SFRA delivers site specific guidance and recommendations for 32 sites in Wealden District, including further evaluation and management of flood risk at each of the sites if they were to come forward. It should be read in conjunction with the Level 1 SFRAs, which deliver a strategic assessment of all sources of flooding in the area.

Habitats Regulation Assessment (HRA) for Regulation 18 Local Plan[38]

3.53 The Conservation of Habitats and Species Regulations 2017 (Habitat Regulations)[39] as amended, transpose the requirements of EC Directive 2009/147/EC on the Conservation of Wild Birds (the Birds Directive) and EC Directive 94/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive). The Habitat Regulations set out a requirement for a HRA to be applied to all land use plans to assess the potential effect of a plan against the conservation objectives of European Sites including SACs, SPAs and Ramsar Sites.

3.54 As highlighted in the introduction to the Spatial Strategy Topic Paper, there are a number of European Sites within Wealden District that need to be protected that includes the Ashdown Forest SAC and SPA, and the Pevensey Levels SAC and Ramsar Site and the HRA considers this against the Regulation 18 growth strategy and whether there is a detrimental impact to any of the European Sites identified (either within or outside the district).

3.55 At this stage, the report confirms that the Regulation 18 Local Plan will not result in an adverse effect on the Lewes Downs SAC and Ashdown Forest SAC. In relation to water quantity, level and flow at the Pevensey Levels SAC and Ramsar site, policy wording in the local plan is provided to protect the hydrological regime of the Pevensey Levels and therefore adverse effects can be mitigated through the provision of Sustainable Drainage Systems (SuDS). In relation to water quality at the Pevensey Levels, further work is required to confirm that adequate headroom is available in the two wastewater treatment works at Hailsham prior to it being confirmed that adverse effects can be excluded. Similarly, it is not possible to conclude at this time whether development will adversely affect the integrity of Ashdown Forest SPA as Suitable Alternative Green Space (SANG) to avoid / mitigate the full amount of growth identified in the local plan has not yet been identified. The HRA will be updated further in relation to all relevant 'Habitats' sites as information and evidence becomes available as the local plan progresses towards its Regulation 19 stage and submission.

Sustainable Settlement Strategy (SSS)

3.56 The SSS surveys a wide range of settlements within Wealden to determine the services and facilities present and the accessibility to existing public transport networks and frequency of transport provision, providing a basis for understanding the sustainability of settlements across the district. This involved defining a list of key services, important community services and

[38] HRA of the Wealden Local Plan: Regulation 18

[39] The Conservation of Habitats and Species Regulations 2017

other community services to reflect their relevant importance and then applying weighted scores to each service, including the availability and frequency of public transport.

3.57 In addition to the quantitative nature of the scoring system, other qualitative factors in determining a settlement's sustainability were considered to understand where a settlement should sit within the settlement hierarchy. This included factors such as transport links, accessibility to larger centres, environmental constraints and the location of settlements and whether they support or share services with a neighbouring settlement. Ultimately, the sustainability of the larger settlement provides a supporting role for settlements that surround it. This approach reflects one of the main objectives of the NPPF, which is to focus growth where residents have the opportunity to use non-car modes of travel.

3.58 The SSS has been used to inform the Settlement Hierarchy and the Spatial Strategy within the Regulation 18 local plan. Table 2 below sets out the proposed Wealden Settlement categories and hierarchy, whilst Figure 1 provides a map showing their location. All settlements that are categorised as types 1, 2, 3 and 4 are considered to be sustainable settlements and are proposed to have development boundaries within the draft Regulation 18 Local Plan[40].

Table 2: Settlement Categories within the Sustainable Settlement Hierarchy

Settlement category	Description	Settlements
Type 1 settlements (Town)	A district centre providing a retail and employment function as well as providing both key and community services. The settlement will provide very frequent public transport options to higher order settlements outside of the district to access employment and additional retail, services and facilities. The settlement provides	Crowborough, Uckfield, Hailsham and Heathfield

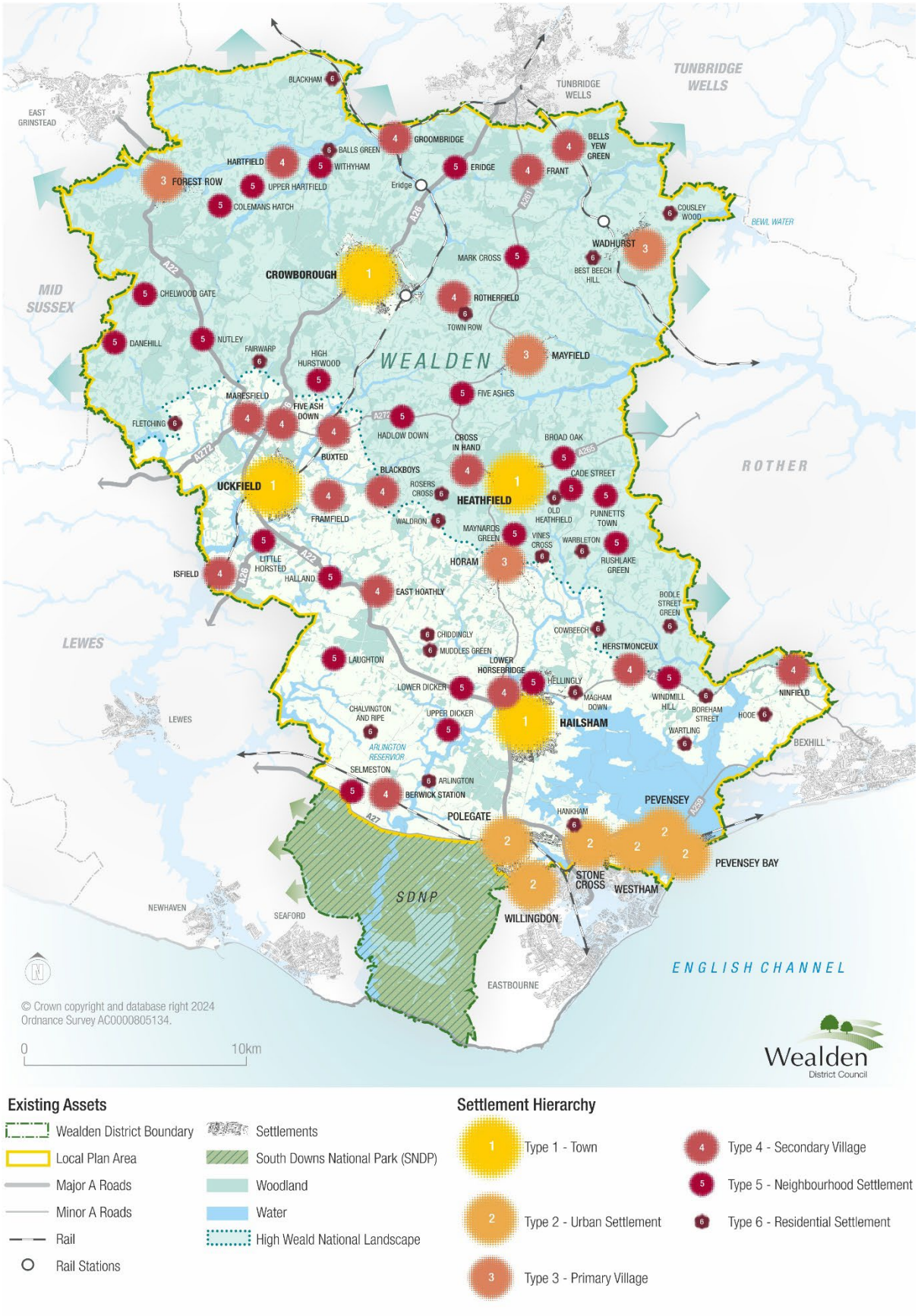
[40] The only exception to this is the settlement of 'Eridge' that is adjudged to have too many significant constraints within its boundaries that includes flood risk, the High Weald National Landscape and many designated heritage assets.

Settlement category	Description	Settlements
	nursery, primary and secondary school provision as well as access to a range of supermarkets.	
Type 2 settlements (Settlements that geographically relate to a regional centre within Wealden district; urban settlements)	A settlement located on the edge of a major conurbation that has very frequent public transport services to access a nearby regional centre, such as Eastbourne or Tunbridge Wells.	Polegate, Willingdon, Stone Cross, Westham, Pevensey, Pevensey Bay.
Type 3 settlements (Primary village)	A settlement providing a smaller retail function than a type 1 settlement as well as providing both key and community services. The settlement will have a frequent public transport service to higher order settlements and key employment locations both within and / or outside of the district. As a minimum the settlement will have a primary school and / or nursery provision, a secondary school or public transport access to a secondary school, a large range and number of services (but less than a type 1 settlement) access to a supermarket or a convenience store (open 9-5, 7 days a week). These settlements provide a number of key services and facilities that meet the settlements own day-to-day needs.	Forest Row, Horam, Mayfield, Wadhurst.

Settlement category	Description	Settlements
Type 4 settlements (Secondary village)	A settlement with a good range of community services with at a minimum a frequent public transport service to a type 1 settlement to access retail, services, facilities and employment.	Bells Yew Green, Berwick Station, Blackboys, Buxted, Cross in Hand, East Hoathly, Eridge, Five Ash Down, Framfield, Frant, Groombridge, Hartfield, Herstmonceux, Isfield, Lower Horsebridge, Maresfield, Ninfield, Rotherfield.
Type 5 settlements (Neighbourhood settlement)	A settlement with some community services with limited access to public transport. It is likely that residents will rely on the private car to travel to meet their day to day needs for education, employment, services and facilities.	Broad Oak, Cade Street, Chelwood Gate, Coleman's Hatch, Danehill, Five Ashes, Hadlow Down, Halland, Hellingly, High Hurstwood, Laughton, Lower Dicker, Little Horsted, Mark Cross, Maynards Green, Nutley Punnetts Town, Rushlake Green, Selmeston, Upper Dicker, Upper Hartfield, Windmill Hill, Withyham.
Type 6 settlements (Residential settlement)	A small rural settlement with limited or no community services and limited or no access to public transport. It is likely that residents will rely on the private car to travel to meet their day-to-day needs for education, employment, services and facilities.	Arlington, Balls Green, Best Beech Hill, Blackham, Bodle Street Green, Boreham Street, Chalvington & Ripe, Chiddingly, Cowbeech, Cousley Wood, Fairwarp, Fletching, Hankham, Hooe, Magham Down, Muddles Green, Old Heathfield, Rosers Cross, Town Row, Vines

Settlement category	Description	Settlements
		Cross, Waldron, Warbleton, Wartling.

Figure 2: Sustainable Settlement Hierarchy



Other Evidence Base Documents

3.59 In addition to the above evidence base documents that are pertinent to the spatial strategy of the district, the Council has also produced a number of other evidence base documents that will inform local plan policies within the district that includes:

- Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA), May 2022;
- Visitor Accommodation Needs Assessment, February 2024;
- Urban Capacity and Density Study, March 2024;
- Interim Infrastructure Delivery Plan (IDP) Part 1, January 2024;
- Draft Equalities and Fairness Impact Assessment, January 2024;
- Development Boundary Topic Paper, March 2024;
- Playing Pitch and Outdoor Sports Strategy, April 2022;
- Open Space Assessment Report, April 2022;
- Indoor Sports Facility Needs Assessment, April 2022;
- Playing Pitch and Outdoor Sport Strategy and Action Plan, March 2023; and
- Wealden Local Plan Viability Assessment, March 2024.

3.60 There are equally a number of existing evidence base documents that will be in the process of being updated prior to the publication of the Regulation 19 local plan, as well as a number of new evidence base documents that will be published in the intervening period between the Regulation 18 and Regulation 19 local plans. This list will be reviewed following the consultation feedback on the Regulation 18 local plan. These are identified below:

- Local Housing Needs Assessment (Update);
- Employment and Economic Study (Update);
- Town Centre Study (Update);
- SHELAA (Update);
- STEB Transport Model (Update);
- HRA (Update);
- Wealden Local Plan Viability Assessment (Update with Sites);
- Green Infrastructure Study;
- Renewable Energy Study;

- Climate Change Study; and
- Biodiversity Study

4. Previous Consultation on a Spatial Strategy

4.1 The first stage of the Council's local plan process was the publication of its 'Direction of Travel' document that was consulted upon between 23 November 2020 and 18 January 2021[41]. It provided an opportunity for us to hear the views of our communities, partner organisations and stakeholders on a range of important topic areas 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. The consultation document set out a number of high-level growth options and invited comments on these. The high-level growth options identified at this stage were as follows:

- 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.

4.2 The following bullet points provide a summary of the common themes raised from the consultation in relation to the growth options presented:

- The respondents to the consultation, when asked what their preferred spatial option was, were relatively evenly split between the four spatial options presented and there was no clear preferred option. However, a new settlement was the least favoured spatial option of the four presented;
- There was support for the Council identifying sustainable settlements to accommodate the majority of housing and development needs, acknowledging that those settlements have access to good public transport, facilities and infrastructure;
- There was strong support for not pursuing allocations for major development schemes within the High Weald National Landscape or in close proximity to the SDNP, or within sites designated for their biodiversity importance (i.e. Ashdown Forest SAC and SPA);

[41] Wealden Local Plan Direction of Travel Consultation, November 2020

- There was general support for delivering sustainable housing sites of all sizes across a large range of settlements, and not to rely solely on larger-scale strategic locations for growth;
- There was some support for development in the smaller villages and settlements within rural areas and this was considered of importance in order to support affordable housing provision, as well as to support the improvement of existing infrastructure/facilities in these locations;
- In relation to Option 1, it was stated by many respondents that concentrating growth in these locations will enable quick and easy connection to existing infrastructure and will reduce the extent of new infrastructure required;
- It was noted that some settlements (Heathfield and Crowborough) were sustainable but largely constrained by the High Weald National Landscape designation, so may not be able to deliver housing growth as envisaged in options 1 and 2;
- In relation to option 3, that is to provide more dispersed growth across all settlements, it was identified that there was some concern from respondents that the option would exacerbate existing pressures on already inadequate transport infrastructure in rural areas and increased car dependency;
- It was suggested by several respondents that the other options (i.e. options 1, 2 and 4) were too restrictive and did not allow for the sustainable growth of rural settlements in order to support their vitality and services. Option 3 would therefore support the vitality of services in those rural settlements;
- Although there is support in principle for option 1, it was considered by some respondents that this should not mean the acceptance of ‘major’ development within the High Weald National Landscape, so we should consider smaller settlements outside of this designation (i.e. option 3);
- In relation to option 4, a ‘new’ freestanding settlement(s) of between 2,000 and 5,000 dwellings, many respondents suggested that the infrastructure requirements needed to serve a brand-new settlement would be significant. It was considered by some that this would make this option untenable by itself as it would not be able to deliver homes in the short to medium term;
- If a location for a new settlement can be found, it was suggested that it could provide for a substantial element of housing need whilst

limiting environmental impacts elsewhere. It was suggested that such development has the opportunity to be sustainable and carbon neutral;

- It was suggested by many respondents that such a 'new' settlement could only be located in the Low Weald and would therefore skew both infrastructure and affordable housing provision to the south of the district;
- It was suggested that with the uncertainty of funding for large-scale infrastructure providers (i.e. A22/A27 improvements), it would be difficult to allocate such a settlement with any certainty.
- It was suggested by some respondents that if a 'new' settlement could not be located near to a railway station, then this would continue to not be a particularly 'green' option or assist with the climate change agenda;
- There was a general consensus that a new settlement would need to be located within the Low Weald (i.e. north of the A27 and to the south of the High Weald National Landscape), near to a trunk road or mainline railway station; and
- Several specific areas of the district were supported in the consultation for new settlements mainly by those promoting those particular sites. This included Isfield, areas surrounding Uckfield, East Hoathly and areas to the west of Hailsham and Polegate. It was suggested that any of these options would require significant infrastructure improvements.

Summary of the Key Issues

4.3 A wide range of considerations and evidence have informed the emerging spatial strategy for the Regulation 18 local plan. These include the following:

- A consideration of previous local plan spatial strategies. This includes the Wealden District Core Strategy Local Plan (February 2013).
- The adopted Wealden District Core Strategy Local Plan (February 2013) spatial strategy focusses development and growth at existing large settlements within the Low Weald (namely, Hailsham, Polegate, Willingdon and Uckfield), as well as the edge of Royal Tunbridge Wells.
- Overall, the previous adopted local plans in Wealden District have tended to focus growth in and around our main towns and have focused less on our more rural settlements and villages.

- However, it is known that other larger rural villages in the Low Weald (i.e. Horam, East Hoathly, Lower Horsebridge, Ninfield etc.) and elsewhere that was not focused upon in the adopted Wealden District Core Strategy Local Plan (February 2013) have had housing development come forward at scale. This was in part due to the Council not being able to demonstrate a five-year housing land supply position in recent years and therefore the application of the 'presumption in favour of sustainable development' as outlined in paragraph 11 of the NPPF.
- The LHNA shows that the district has a substantial housing need of 1,200 dpa and confirms that the Council has a pressing requirement to provide affordable housing of all forms. It also evidences that larger regional towns on the edge of the district do exert influence on the district in terms of its HMA and that primarily, the pull is from Eastbourne and Tunbridge Wells, albeit that there are other HMAs overlapping into the district.
- The Employment and Economic Study (April 2022) produced for the Regulation 18 local plan outlines substantial land requirements for industrial and warehousing uses (Use Class B2 and B8) and it was recommended that 48.3 ha (or 196,700 sqm) should be found to support those uses between 2019 and 2039. It was also found that there was a more limited requirement of 3.1 to 6.8 hectares of office (ha) floorspace to be provided by 2039. The Town Centre Study did not identify any distinct need to allocate retail floorspace within the local plan.
- In spatial terms, it was recommended that Wealden should make provision across the district for employment floorspace as all towns with industrial estates are essentially 'full'. It was recommended that at least one larger allocation (10 ha +) in the south of the district would be appropriate, making use of connectivity and proximity to the Eastbourne urban area and highways connections (A22 / A27).
- The current transport evidence base indicates that the levels of development growth within the Regulation 18 local plan could have severe impacts on parts of the A27, A22 and A26 and A2270 specifically. As part of the STEB model, initial concept designs have been assessed at several junction locations for mitigation; however, the level of impact on parts of the A22, north of Hailsham, the A27/A2270, between Wealden and Eastbourne, and A26 corridor, is likely to require further consideration in the countywide model, further option testing and the consideration of possible additional mitigation measures.

- Although CO2e emissions have been falling steadily in Wealden from 2005 to 2020, the road network is widely used by residents and the majority of greenhouse gas emissions in 2020 continue to come from road transport (55.6%) within Wealden. The method of transport within the district is the most significant contributor towards greenhouse gas emissions in the district and therefore climate change, which means that the spatial growth strategy is crucial in reducing greenhouse emissions in the future.
- The SSS has considered the sustainability of settlements and has defined a settlement hierarchy for the district, and this will help guide (subject to constraints and the availability of sites) the location of future development.
- The previous 'Direction of Travel' document offered four broad spatial options that could form the spatial strategy for the district, and we received a variety of comments on those options. Consultation responses in general supported growth in our most sustainable settlements specifically in order to support the viability of those centres and to reduce the effects of climate change by providing choices for those residents to use sustainable modes of travel.
- It was recognised by some respondents that development within smaller, more rural settlements may also be beneficial in order to sustain services in those locations and provide much needed affordable housing. There was also some concern as to the viability of developing new garden villages in the early part of the plan period due to the requirement to provide significant infrastructure on such sites and the likely long lead in times for such developments.

4.4 Paragraph 35 of the NPPF confirms that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are 'sound'. It confirms, amongst other matters, that spatial development strategies need to be consistent with national policy (i.e. enabling the delivery of sustainable development in accordance with the NPPF) and justified, based on an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

5. The Spatial Strategy Options for the Wealden Regulation 18 Local Plan

5.1 On the basis of the above information from national planning policy, local planning policy, consultation, evidence base documents and other guidance, a number of potential spatial options have been developed for consideration

for the emerging Regulation 18 local plan. These comprise of the following options:

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 SSS), and to the edge of major towns that lie adjacent to the district (i.e., Eastbourne and Royal Tunbridge Wells);

c) To focus growth outside of the High Weald AONB, 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;

5.2 The analysis of the options is set out in more detail in Appendix 1, as well as the Council's SA. This shows the seven identified options (A-G) for the spatial strategy. In assessing these options, the Council has had regard to the following criteria:

- Whether the spatial option is considered to be consistent with national planning legislation, policy and guidance;
- Whether the spatial option is considered to be consistent with the emerging Local Plan policies, as well as the Council's local evidence base. This also includes whether the spatial strategy addresses other objectives of the corporate plan, the climate emergency plan etc.;
- Whether the spatial option 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 spatial strategy performs in terms of their sustainability, as evidenced through the Sustainability Appraisal (SA) process.

5.3 The following paragraphs will now summarise all seven of the spatial options assessed, before reaching a conclusion as to what the Council's preferred spatial strategy option is at the Regulation 18 stage of the plan-making process.

The Spatial Option - Reasonable Alternatives

5.4 Option A is an identified strategic spatial option that seeks to maximise growth in all locations within the district to meet the Council's housing and employment needs requirement. This option presents opportunities for all settlements to grow and allow for the vitality of some of our urban and rural communities to be sustained, and moreover, support new services and facilities. However, it could also lead to development in locations that are not sustainable (i.e. not well served by a range of existing services, facilities, infrastructure or public transport). It is considered that this could lead to unsustainable patterns of movement and a reliance on the car which would further be detrimental to the climate change agenda and could also result in social isolation.

5.5 In addition, spatial option A would require all settlements within the district to be able to expand. This is not achievable given the physical and / or planning constraints in certain locations. Such constraints include designated sites, such as Ashdown Forest and Pevensey Levels as well as other nationally or local biodiversity sites, flood risk, landscape constraints including locating development within the nationally designated High Weald National Landscape or in the setting of the South Downs National Park. In addition, maximising growth in all settlements may also lead to detrimental impacts upon the character and identity of settlements and the rural environment. In terms of deliverability, Option A is also dependant on the availability of a wide range of sites in all locations and there are some areas where sites are not suitable or deliverable.

5.6 In addition, maximising growth in all locations is likely to cause severe impacts on the local highway network, particularly along existing SRN/MRN junctions where there are known capacity issues and limited access to sustainable modes of travel. This option is therefore not preferred, and it is proposed that Option A is not taken forward.

5.7 Similarly, spatial option E is an identified strategic spatial option that seeks to maximise growth in all locations within the district to meet the Council's housing and employment needs requirement and would also potentially meet part of our neighbouring authority's development needs. This spatial option suffers from similar issues to Option A, although exacerbated further due to the scale of development included in this option and it is proposed that Option E is not taken forward.

5.8 Option B focuses 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). The approach of this spatial option most resembles the Wealden District Core Strategy Local Plan (February 2013) and confirms that settlements, which are the most sustainable as defined within the SSS, should deliver the most growth in line with that settlement hierarchy. It also confirms that sites on the edge of Royal Tunbridge Wells and Eastbourne will also be considered sustainable given their proximity to these higher order towns, their services and facilities, as well as access to sustainable modes of transport. This would in turn support the viability and vitality of our main town/village centres and potentially sustain/enhance key services within the district. It also aligns with both national planning policy on this issue and our local evidence base.

5.9 However, spatial option B is not selected given there is currently some uncertainty within the local plan as to whether an employment site (Ashdown Business Park) can come forward (which is included within this spatial option) and further work on this and other potential options for employment growth will be considered at the Regulation 19 stage.

5.10 Option C aims to focus growth outside of the High Weald National Landscape, within sustainable settlements as outlined in the SSS and within the Low Weald landscape area (i.e. Uckfield, Hailsham, Polegate and Willingdon and other villages). This would reduce the impact on the High Weald National landscape, which is a key priority both nationally and locally. However, this approach may not adequately support the smaller rural communities located within the High Weald National Landscape, including the viability and vitality of its high streets, the rural economy (including tourism) or affordable housing provision. If this option was to be taken forward in isolation, the Council may miss opportunities to provide sustainable development in these locations, which would also mean that the Council has not explored all opportunities for housing growth to meet its housing needs. For this reason, it is proposed that Option C is not taken forward.

5.11 Option D aims to focus growth on the delivery of new strategic extensions at existing sustainable settlements. It is considered that there are some substantive options to deliver new strategic extensions, particularly within the Low Weald and that this option may be deliverable, although further work will be needed to determine this as part of Regulation 19 local plan.

5.12 However, this spatial option D, in isolation, is unlikely to deliver benefits across a wide range of communities, given that substantial growth would only be achieved within a single or several towns and villages across the district. This option may also take a long time to deliver (between 10-20 years) should such site(s) be suitable. The current transport modelling exercise (STEB)

shows that with growth contained within the Regulation 18 Local Plan could have a severe impact on parts of the A27, A22 and A26 and A2270 particularly, which would require significant mitigation. The scheme(s) will likely have long lead-in times as they will have more complex and protracted infrastructure, transport, masterplanning and construction issues. This will have implications for the Council's housing land supply position, as it would not be able to demonstrate the deliverability of such sites within the first five years of the Plan. This option is therefore not preferred, and it is proposed that Option D is not taken forward.

5.13 Option G is a combination of spatial option B and D and therefore has similar issues to those spatial options. At this stage, there is currently some uncertainty within the Local Plan as to whether an employment site (Ashdown Business Park) included in this spatial option can come forward through the Local Plan and further work on this and other potential options for employment growth will be considered at the Regulation 19 stage. In addition, there is also uncertainty as to whether a large mixed-use site, named 'West of Uckfield' can come forward through this spatial option and this will be explored further in the Regulation 19 Local Plan. It is noted that further development within and around existing sustainable settlements would continue and subject to the suitability and achievability of specific sites, this could achieve a satisfactory spatial strategy overall, but requires further testing.

Preferred Option for Regulation 18 Local Plan

5.14 Option F is considered to provide the most sustainable spatial strategy at the Regulation 18 local plan stage 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.

5.15 Option F was considered positively within the SA, as it would deliver growth largely within our most sustainable settlements as defined within the SSS, which have the majority of facilities, services and access to sustainable modes of transport. This spatial option therefore has the potential to improve these existing facilities and services through a new population and would also reduce the future need for trips via the private motor vehicle, which would help to combat the effects of climate change.

5.16 In addition, this spatial option would make the best use of 'brownfield land' as it would ensure that growth is directed to our most sustainable settlements. It also ensures that the Council can deliver as much of its housing and employment growth as possible, without compromising the natural and built

environment, particularly the High Weald National Landscape and national/internationally designated ecological sites. Lastly, there are no significant uncertainties surrounding the sites provided within this spatial option and it is considered that the spatial option is deliverable.

6. Conclusion and Next Steps

6.1 In light of the assessment above and the SA for the Regulation 18 Local Plan, the Council considers that Spatial Option F is the preferred spatial option at this stage, although the Council will continue to explore other spatial options (specifically, Spatial Options B, D and G) in preparation of the Regulation 19 local plan.

6.2 The 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 producing further evidence base documents that will include updates to its LHNA, its economy study, its SHELAA (including the assessment of new sites), responses to the Regulation 18 local plan consultation, specifically on the spatial strategy, other site-specific evidence, transport modelling (using the county-wide transport model), the HRA, as well as further rounds of the SA. The Council will also consider any changes to the NPPF, which may come forward in the intervening period between the Regulation 18 local plan and the Council's Regulation 19 local plan.

6.3 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.

Appendix 1: Assessment of Spatial Strategy Options

Spatial Option A: To maximise growth in all locations within the district to meet the Council's housing and employment needs requirement			
NPPF & legislation	**Evidence Base & emerging Local Plan Policies**	**Deliverability**	**SA Performance**
Partially. This would mean that the Council may be able to achieve the district's overall housing and employment need target. In addition, this spatial option will create jobs and homes in all locations across the district, which would positively impact those communities. However, there would of course be negative environmental impacts in more sensitive rural locations (particularly within or near to the High Weald National Landscape, SDNP, Ashdown Forest and Pevensey Levels), which are national/ international environmental or landscape designations. This	Both the quantum and dispersed nature of the growth has the potential to support the economy across the district and would also support meeting the housing needs of communities across all parishes, and particularly affordable housing needs in rural communities and the High Weald National Landscape. However, a more dispersed approach is likely to include residential development at scale that would be located in less sustainable locations, which would result in a greater reliance on the private motor vehicle to meet daily needs.	The deliverability of this approach relies upon the availability of a wide and diverse range of sites that are suitable for their prospective use in all locations within the district. However, it is known that some sustainable settlements will not be able to expand significantly due to major physical/planning constraints (i.e. flood risk at Pevensey Levels, or settlements within, or largely within the 400-metre boundary of the Ashdown Forest Special Protection Area (SPA)). It is also known that several sites within the spatial option are considered unsuitable as part	This spatial option will deliver around 20,250 (net) dwellings in, or surrounding sustainable settlements, which is 450 dwellings over Wealden District's overall housing need target for the Plan period. The option will also meet the full employment needs of the district and will improve town and village centres through new jobs and homes. However, there will be major negative impacts of this growth, namely from the impact on the landscape of Wealden (including the High Weald National Landscape). There are also significant highway constraints within the

option may also result in development in more unsustainable locations, which would be contrary to the NPPF and particularly paragraph 109, which states significant development should be focused on locations which are or can be made sustainable. This would have implications for climate change objectives as the resultant dwellings may be dependent upon the private motor vehicle to meet day to day needs.	There are also major constraints within the district (landscape and ecological) that would limit development in significant parts of the district. Lastly, the impact of maximising growth in all locations within the district on infrastructure (i.e., the strategic road network, sewage infrastructure, water supply etc.) may be severe and would require significant mitigation, which may not be possible during the plan period.	of the Regulation 18 local plan process. Therefore, there will be local constraints that will limit the deliverability of this spatial option within the entirety of the district.	district for growth along the SRN/MRN. Maximising growth in all locations is likely to cause severe impacts on the local highway network, particularly along existing SRN/MRN junctions where there are known capacity issues and limited access to sustainable modes of travel. The Council will consider whether mitigation measures are possible between the Regulation 18 and Regulation 19 consultations, but early indications of the transport modelling show that if this option was pursued, it would be unlikely that such mitigation at junctions along the SRN/MRN will be achievable for all sites.
Summary – Option A			
Spatial Option not selected			

Overall, this spatial option would enable the vitality of some of our urban and rural communities to be sustained, and moreover, support new services and facilities within those villages where growth happens. However, to maximise development in some settlements, which are unsustainable and where there is a lack of services, facilities and public transport, is not considered to be consistent with the NPPF or the Council's own evidence base (i.e. the SSS). This could lead to unsustainable patterns of movement and a reliance on the car, as well as detrimental impacts to both the landscape and townscape of villages within the district. In addition, maximising growth in all locations is likely to cause severe impacts on the local highway network, particularly along existing SRN/MRN junctions where there are known capacity issues and limited access to sustainable modes of travel.

Spatial Option B: 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)			
NPPF & legislation	**Evidence Base & emerging Local Plan Policies**	**Deliverability**	**SA Performance**
This spatial option is consistent with the NPPF. Paragraph 109 of the NPPF confirms that the planning system should actively manage patterns of growth and that significant development should be focused on locations which are or can be made sustainable, through limiting the need for travel and offering a genuine choice of transport modes. It is considered that focusing growth on the most sustainable settlements in the district and on the edge of other major towns that adjoin the district boundaries will align with the NPPF for plan-making and will support	It is considered that the larger settlements of the district are in most cases, to provide the most services, facilities, access to sustainable transport modes, educational facilities and employment opportunities. Therefore, the spatial option is considered to align with the Council's evidence base in terms of its SSS and would support the vitality and viability of a wide range of larger and smaller communities across the district. This would include support for Town Centres and High Streets across the district. It would also ensure that the existing infrastructure in those towns and villages	This option is likely to be deliverable. The Council's SHELAA process has identified many sites within or on the edge of our most sustainable settlements. Given the breadth of site's submitted within or surrounding those settlements, it is envisaged that sites of all sizes and locations across the district can come forward. However, there is significant uncertainty as to the suitability and deliverability of an employment site (Ashdown Business Park) contained within this spatial option.	This spatial option will deliver around 15,750 (net) dwellings in sustainable settlements, which is circa 4,000 dwellings short of overall housing need for the Plan period. The option, however, will meet the full employment needs of the district and will improve town and village centres through new jobs and homes. There are no major negative impacts of this spatial option, although minor negative impacts do occur for climate change mitigation, waste, pollution, biodiversity, landscape and heritage, although there may be mitigation measures that could be implemented for some or all of these issues.

growth in the most sustainable locations.	(i.e. roads, sustainable modes of travel, sewage works etc.) can continue to be utilised and improved, without the significant requirement for the construction of new infrastructure. This option largely replicates the Council's previously adopted Wealden District Council Core Strategy Local Plan (February 2013) and its spatial strategy that distributed growth largely to its main towns and areas adjacent to Eastbourne and Royal Tunbridge Wells.		However, there is currently some uncertainty within the local plan as to whether an employment site (Ashdown Business Park) can come forward (which is included within this spatial option) and further work on this and other potential options for employment growth will be considered at the Regulation 19 stage.
Summary – Option B			
Spatial Option Not Selected (but further work to be undertaken on this spatial option for the Regulation 19 stage) It is considered that this spatial option is sustainable as it would distribute growth to our most sustainable settlements as defined within the SSS. This would in turn support the viability and vitality of our main town/village centres and potentially sustain/enhance key services within the district. This would also mean that the new population will already be supported by a range of facilities and services, as well as access to other non-car modes of transport. However, there is currently some uncertainty within the local plan as to whether an employment site (Ashdown Business Park) can come forward (which is			

included within this spatial option) and further work on this and other potential options for employment growth will be considered at the Regulation 19 stage.

Spatial Option C: To focus growth outside of the High Weald AONB, within and around sustainable settlements in the Low Weald (i.e., Uckfield, Hailsham, Polegate and Willingdon and other villages)			
NPPF & legislation	**Evidence Base & emerging Local Plan Policies**	**Deliverability**	**SA Performance**
This spatial option is largely consistent with the NPPF. Paragraph 182 of the NPPF confirms that great weight should be given to conserving and enhancing landscape and scenic beauty in the High Weald National Landscape. It also states that the scale and extent of development within these designated areas should be limited. This spatial option would aim to steer development away from the High Weald National Landscape. However, it should be noted that some large sustainable settlements within Wealden (i.e. Crowborough, Heathfield) are surrounded by the High	This is largely consistent with the Council's evidence base, and the emerging polices of the Local Plan that seeks to avoid development within the High Weald National Landscape where possible. It is considered that the larger settlements of the Low Weald are in most cases, to provide the most services, facilities, access to sustainable transport modes, educational facilities and employment opportunities. Therefore, the spatial option is considered to align with the Council's evidence base in terms of its SSS and would support the vitality and viability of a wide range of larger and smaller	This option is likely to be deliverable. The Council's SHELAA process has identified many sites within or on the edge of our most sustainable settlements in the Low Weald. Given the breadth of site's submitted within or surrounding those settlements, it is envisaged that sites of all sizes and locations across the Low Weald can come forward. However, in terms of the HMA for the district, it is known that settlements within the High Weald National Landscape (i.e. Crowborough and Heathfield) form part of the Tunbridge Wells/Sevenoaks HMA and that much of the	This spatial option will deliver around 15,000 (net) dwellings in sustainable settlements, which is approximately circa 4,800 dwellings short of overall housing need for the district and is the least of any of the spatial options considered. The option will, however, meet the full employment needs of the district and improve the town and village centres through new jobs and homes, at least within the Low Weald. There are no major negative impacts for this spatial option, although minor negative impacts do occur for climate change mitigation, waste, pollution, biodiversity and social

Weald National Landscape designation, whilst some larger villages (i.e. Wadhurst) are washed over by the designation. If the Council was to steer growth away from the, this may mean that the growth of those sustainable settlements may be curtailed. This would be contrary to the NPPF at paragraph 109 that aims to focus growth within the most sustainable locations.	communities in the Low Weald. However, the SSS also considers other settlements within, or surrounded by the High Weald National Landscape are sustainable (i.e. Crowborough and Heathfield) and could therefore support growth on sustainability grounds subject to constraints. This spatial option may therefore miss opportunities to deliver new homes/employment development in these locations and may not support the viability and vitality of those locations.	Low Weald forms part of the Eastbourne focused HMA. In terms of deliverability, this may mean that the delivery of market housing and employment uses in the Low Weald could slow the delivery of housing overall in the district, given that parts of the district will not have new housing or employment land delivered.	deprivation. There may be mitigation measures which could be implemented for some or, all of these issues. However, due to the low level of housing supported in this spatial option, particularly within the High Weald National Landscape, it is not considered to meet several objectives for the Local Plan. In addition, there is currently some uncertainty within the Local Plan as to whether an employment site (Ashdown Business Park) can come forward through the Local Plan and further work on this and other potential options for employment growth will be considered at the Regulation 19 stage.
Summary – Option C			
Spatial Option not selected.			

Locating growth within the Low Weald within our most sustainable settlements (as defined by the SSS) is considered to be sustainable spatial option and would reflect national planning policy and the Council's SSS. It would also reduce the impact on the High Weald National Landscape designation, which is key priority both nationally and locally.

However, this approach may not adequately support the smaller rural communities located within the High Weald National Landscape, including the viability and vitality of its high streets, the rural economy (including tourism) or affordable housing provision. If this option was to be taken forward in isolation, the Council may miss opportunities to provide sustainable development in these locations, which would also mean that the Council has not explored all opportunities for housing growth to meet its housing needs. Therefore, although the Council will aim to avoid harm to the High Weald National Landscape through its local plan, opportunities to deliver development in these locations will still need to be explored and this spatial does not allow for this to happen.

There is currently some uncertainty within the local plan as to whether an employment site (Ashdown Business Park) can come forward (which is included within this spatial option) and further work on this and other potential options for employment growth will be considered at the Regulation 19 stage.

Spatial Option D: To focus growth on the delivery of new strategic extensions at existing sustainable settlements. Continue to support growth through windfalls at those settlements			
NPPF & legislation	**Evidence Base & emerging Local Plan Policies**	**Deliverability**	**SA Performance**
This spatial option is largely consistent with the NPPF. Paragraph 74 of the NPPF confirms that the supply of large numbers of homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure (including a genuine choice of transport modes). However, this approach is likely to result in new development in the countryside at the edge of settlements (in greenfield locations) and not necessarily	This spatial option, delivered in isolation, is unlikely to deliver benefits across a wide range of existing communities, particularly in the short term as the site(s) themselves will take a long time to deliver. However, if a large-scale site(s) was to be found suitable at the edge of an existing sustainable settlement within the Low Weald, this may bring particular benefits to that town/village in terms both retaining and enhancing its services and facilities, as well as potentially providing other benefits (i.e. educational uses, sports provision, community uses) at the site itself. Dependent on the	The deliverability of this spatial option is a concern, particularly in the short-term, as this option may take a long time to deliver (between 10-20 years) if suitable sites are found. In addition, the current transport modelling exercise (STEB) shows that growth contained within the Regulation 18 Local Plan could have a severe impact on parts of the A27, A22 and A26 and A2270 particularly, which would require significant mitigation. The scheme(s) will likely have long lead-in times as they will have more complex and protracted infrastructure, transport, masterplanning and	This spatial option will deliver around 15,500 (net) dwellings in sustainable settlements, which is circa 4,300 dwellings short of overall housing need. The option will, however, meet the full employment needs of the district and will improve the town and village centres through new jobs and homes. There are no major negative impacts for this spatial option, although minor negative impacts do occur for climate change mitigation, waste, pollution, biodiversity, landscape and heritage. There may be mitigation measures which could be implemented for some or all of these issues.

in the most sustainable locations (albeit this may be achieved when adjoining the most sustainable settlements). This spatial option is likely to support and sustain the existing village and/or town centre it adjoins but would not necessarily support the re-use of brownfield land within the district or support other town and village centres in the district, if brought forward in isolation.	specific location of the site(s), there may also be potential to provide pedestrian/cycling access to sustainable transport modes, such as a railway station. Lastly, it is considered that this spatial option could deliver a substantial number of homes to meet a large part of housing need and would be best able to achieve a greater diversity of housing stock and types (i.e. affordable housing, older persons accommodation, self-build) when compared to other smaller sites.	construction issues. This will have implications for the Council's housing land supply position, as it would not be able to demonstrate the deliverability of such sites within the first five years of the Plan. This spatial option in isolation is not considered deliverable by itself.	There is currently some uncertainty within the Local Plan as to whether an employment site (Ashdown Business Park) included in this spatial option can come forward through the Local Plan and further work on this and other potential options for employment growth will be considered at the Regulation 19 stage. In addition, there is also uncertainty as to whether a large mixed-use site, named 'West of Uckfield' can come forward through this spatial option and this will be explored further in the Regulation 19 Local Plan.
Summary – Option D			
Spatial Option Not Selected (but further work to be undertaken on this spatial option for the Regulation 19 stage) The NPPF confirms that the supply of large numbers of homes can often be achieved through planning for larger scale development, such as significant extensions to existing villages and towns, provided they are well located, supported by the necessary infrastructure that includes a choice of transport modes for future occupants. It is considered that there may be site			

options within the Local Plan process to achieve this. This is supported nationally and locally through the SSS, albeit that not all communities across the district would benefit, particularly in the short-term.

However, there is currently some uncertainty within the Local Plan as to whether an employment site (Ashdown Business Park) included in this spatial option can come forward through the Local Plan and further work on this and other potential options for employment growth will be considered at the Regulation 19 stage. In addition, there is also uncertainty as to whether a large mixed-use site, named 'West of Uckfield' can come forward through this spatial option and this will be explored further in the Regulation 19 Local Plan. It is noted that due to deliverability concerns, this option cannot be taken forward in isolation, and that further development within and around existing sustainable settlements would be required to achieve a satisfactory spatial strategy overall.

Spatial Option 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			
NPPF & legislation	**Evidence Base & emerging Local Plan Policies**	**Deliverability**	**SA Performance**
Partially. This would mean that the Council may be able to achieve the district's overall housing and employment need target, as well as meet some of our neighbouring authority's development needs. In addition, this spatial option will create jobs and homes in all locations across the district, which would positively impact those communities. However, there would of course be negative environmental impacts in more sensitive rural locations (particularly within or near to the High Weald National Landscape, SDNP, Ashdown Forest and Pevensey Levels), which are national/	Both the quantum and dispersed nature of the growth has the potential to support the economy across the district and would also support meeting the housing needs of communities across all parishes, and particularly affordable housing needs in rural communities and the High Weald National Landscape. However, a more dispersed approach is likely to include residential development at scale that would be located in less sustainable locations, which would result in a greater reliance on the private motor vehicle to meet daily needs. There are also major	The deliverability of this approach relies upon the availability of a wide and diverse range of sites that are suitable for their prospective use in all locations within the district. However, it is known that some sustainable settlements will not be able to expand significantly due to major physical/planning constraints (i.e. flood risk at Pevensey Levels, or settlements within, or largely within the 400-metre boundary of the Ashdown Forest Special Protection Area (SPA)). It is also known that a number of sites within the spatial option are considered unsuitable as part of the Regulation 18 local	This spatial option will deliver around 21,200 (net) dwellings in, or surrounding sustainable settlements, which is approximately 1,400 dwellings over Wealden District's overall housing need. The option will also meet the full employment needs of the district and will improve the town and village centres through new jobs and homes. However, there will be major negative impacts of this growth, namely the impact on the landscape of Wealden (including the High Weald National Landscape), the historic environment and pollution. There are also significant highway constraints within the district for growth

international environmental or landscape designations. This option may also result in development in more unsustainable locations, which would be contrary to the NPPF and particularly paragraph 109, which states significant development should be focused on locations which are or can be made sustainable. This would have implications for climate change objectives as the resultant dwellings may be dependent upon the private motor vehicle to meet day to day needs.	constraints within the district (landscape and ecological) that would limit development in significant parts of the district. Lastly, the impact of maximising growth in all locations within the district on infrastructure (i.e., the strategic road network, sewage infrastructure, water supply etc.) would be severe and would require significant mitigation, which may not be possible during the plan period.	plan process. Therefore, there will be local constraints that will limit the deliverability of this spatial option within the entirety of the district.	along the SRN/MRN routeways. Maximising growth in all locations is likely to cause severe impacts on the local highway network, particularly along existing SRN/MRN junctions where there are known capacity issues and limited access to sustainable modes of travel. The Council will consider whether mitigation measures are possible between the Regulation 18 and Regulation 19 consultations, but early indications of the transport modelling show that if this option was pursued, it would be unlikely that such mitigation at junctions along the SRN/MRN will be achievable for all sites.
Summary – Option E			
Spatial Option not selected.			

Overall, this spatial option would enable the vitality of some of our urban and rural communities to be sustained, and moreover, support new services and facilities within those villages where growth happens. However, to maximise development in some settlements, which are unsustainable and where there is a lack of services, facilities and public transport, is not considered to be consistent with the NPPF or the Council's own evidence base (i.e. the SSS). This could lead to unsustainable patterns of movement and a reliance on the car, as well as detrimental impacts to both the landscape and townscape of villages within the district. In addition, maximising growth in all locations is likely to cause severe impacts on the local highway network, particularly along existing SRN/MRN junctions where there are known capacity issues and limited access to sustainable modes of travel.

Spatial Option 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			
NPPF & legislation	**Evidence Base & emerging Local Plan Policies**	**Deliverability**	**SA Performance**
This spatial option is consistent with the NPPF. Paragraph 109 of the NPPF confirms that the planning system should actively manage patterns of growth and that significant development should be focused on locations which are or can be made sustainable, through limiting the need for travel and offering a genuine choice of transport modes. It is considered that focusing growth on the most sustainable settlements in the district and on the edge of other major towns that adjoin the district boundaries will align with the NPPF for plan-	It is considered that the larger settlements of the district are in most cases, to provide the most services, facilities, access to sustainable transport modes, educational facilities and employment opportunities. Therefore, the spatial option is considered to align with the Council's evidence base in terms of its SSS and would support the vitality and viability of a wide range of larger and smaller communities across the district. This would include support for Town Centres and High Streets across the district. It would also ensure that the existing infrastructure	This option is likely to be deliverable. The Council's SHELAA process has identified many sites within or on the edge of our most sustainable settlements. Given the breadth of site's submitted within or surrounding those settlements, it is envisaged that sites of all sizes and locations across the district can come forward.	This spatial option will deliver around 15,750 (net) dwellings in sustainable settlements, which is approximately 4,000 dwellings short of the overall housing need. The spatial option will also not deliver the full employment needs of the district and will be 68,000 sqm short of the overall need for B2 and B8 uses (when accounting for completions). However, the option will continue to improve town and village centres through new jobs and homes. There are no major negative impacts for this spatial option, although minor negative impacts do occur for climate change mitigation,

making and will support growth in the most sustainable locations.	in those towns and villages (i.e. roads, sustainable modes of travel, sewage works etc.) can continue to be utilised and improved, without the significant requirement for the construction of new infrastructure. This option largely replicates the Council's previously adopted Wealden District Council Core Strategy Local Plan (February 2013) and its spatial strategy that distributed growth largely to its main towns and areas adjacent to Eastbourne and Royal Tunbridge Wells.		waste, pollution, biodiversity, landscape and heritage and social deprivation. There may be mitigation measures that could be implemented for some, or all of these issues. There are no significant uncertainties surrounding the sites provided within this spatial option and it is considered that the spatial option is deliverable.
Summary – Option F			
Spatial Option Selected (further work to be undertaken on this spatial option for the Regulation 19 stage) It is considered that this spatial option is sustainable as it would distribute growth to our most sustainable settlements as defined within the SSS. This would in turn support the viability and vitality of our main town/village centres and potentially sustain/enhance key services within the district. This would also mean that the new population will already be supported by a			

range of facilities and services, as well as access to other non-car modes of transport. There are no significant uncertainties surrounding the sites provided within this spatial option and it is considered that the spatial option is also deliverable.

Spatial Option G: Combined Option of Spatial Options B and D			
NPPF & legislation	**Evidence Base & emerging Local Plan Policies**	**Deliverability**	**SA Performance**
This spatial option is largely consistent with the NPPF. Paragraph 74 of the NPPF confirms that the supply of large numbers of homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure (including a genuine choice of transport modes). However, this approach is likely to result in new development in the countryside at the edge of settlements (in greenfield locations) and not necessarily in the most sustainable	It is considered that the larger settlements of the district are in most cases, to provide the most services, facilities, access to sustainable transport modes, educational facilities and employment opportunities. Therefore, the spatial option is considered to align with the Council's evidence base in terms of its SSS and would support the vitality and viability of a wide range of larger and smaller communities across the district. This would include support for Town Centres and High Streets across the district. It would also ensure that the existing infrastructure in those towns and villages (i.e. roads, sustainable modes	The deliverability of this spatial option is a concern, particularly in the short-term, as this option may take a long time to deliver (between 10-20 years) if suitable sites are found. In addition, the current transport modelling exercise (STEB) shows that growth contained within the Regulation 18 Local Plan could have a severe impact on parts of the A27, A22 and A26 and A2270 particularly, which would require significant mitigation. The larger scheme(s) will likely have long lead-in times as they will have more complex and protracted infrastructure, transport, masterplanning and	This spatial option will deliver around 17,750 (net) dwellings, which is approximately 2,000 dwellings short of the overall housing target of 19,800 (net) dwellings. The option will, however, meet the full employment needs of the district and will improve town and village centres through new jobs and homes. There are no major negative impacts of this spatial option, although minor negative impacts do occur for climate change mitigation, soil, land and minerals, waste, pollution, biodiversity, landscape and heritage, although there may be mitigation measures that could be implemented for some or all of these issues.

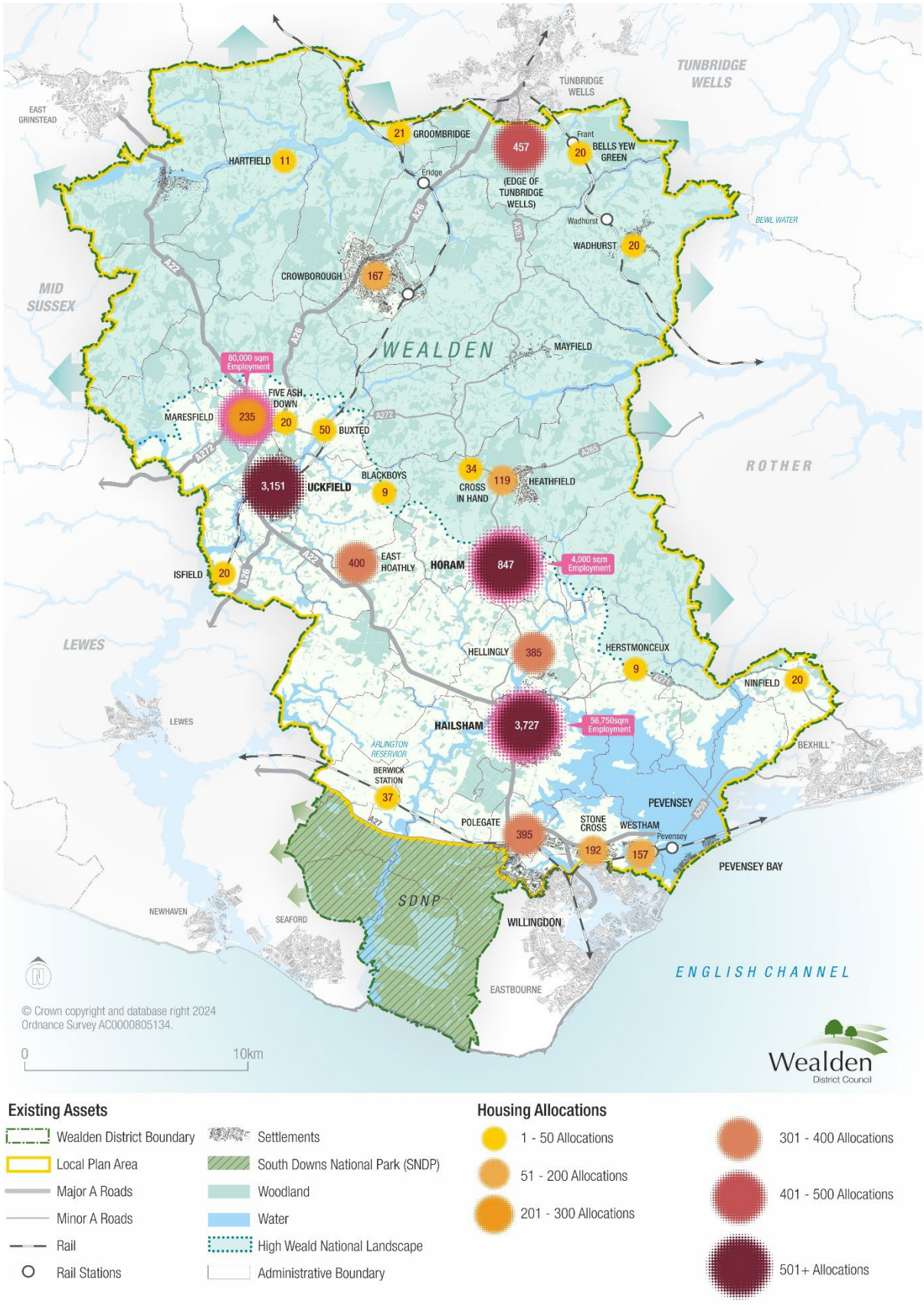
locations, albeit this combined option will continue to support smaller housing development within sustainable settlements.	of travel, sewage works etc.) can continue to be utilised and improved. However, due to the new strategic sites included within this spatial option, there will continue to be a significant requirement for the construction of new infrastructure. This option largely replicates the Council's previously adopted Wealden District Council Core Strategy Local Plan (February 2013) and its spatial strategy that distributed growth largely to its main towns and areas adjacent to Eastbourne and Royal Tunbridge Wells.	construction issues. This may have implications for the Council's housing land supply position, as it would not be able to demonstrate the deliverability of such large sites within the first five years of the Plan. However, the combination of spatial options B and D will mean that some smaller sites will come forward in the early part of the plan period.	There is currently some uncertainty within the Local Plan as to whether an employment site (Ashdown Business Park) in this option can come forward through the Local Plan and further work on this and other potential options for employment growth will be considered at the Regulation 19 stage. In addition, there is also uncertainty as to whether a large mixed-use site, named 'West of Uckfield' can come forward through this spatial option and this will be explored further in the Regulation 19 Local Plan.
Summary – Option G			
Spatial Option Not Selected (but further work to be undertaken on this spatial option for the Regulation 19 stage) The NPPF confirms that the supply of large numbers of homes can often be achieved through planning for larger scale development, such as significant extensions to existing villages and towns, provided they are well located, supported by the necessary infrastructure that includes a choice of transport modes for future occupants. It is considered that there may be site			

options within the Local Plan process to achieve this. This is supported nationally and locally through the SSS, albeit that not all communities across the district would benefit.

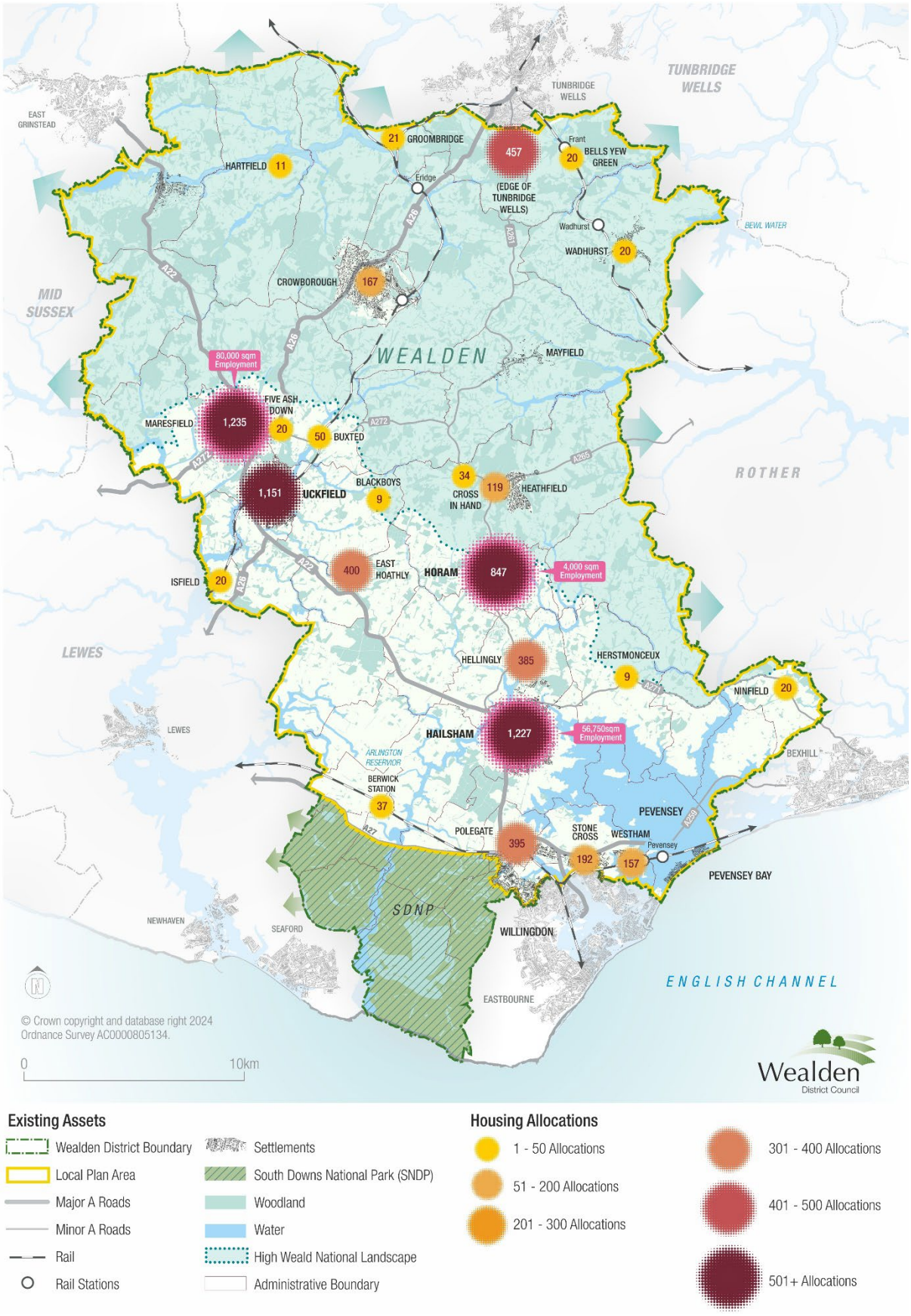
However, there is currently some uncertainty within the Local Plan as to whether an employment site (Ashdown Business Park) included in this spatial option can come forward through the Local Plan and further work on this and other potential options for employment growth will be considered at the Regulation 19 stage. In addition, there is also uncertainty as to whether a large mixed-use site, named 'West of Uckfield' can come forward through this spatial option and this will be explored further in the Regulation 19 Local Plan. It is noted that further development within and around existing sustainable settlements would continue and subject to the suitability and achievability of specific sites, this could achieve a satisfactory spatial strategy overall.

Appendix 2: Spatial Option Maps for Regulation 18 Local Plan

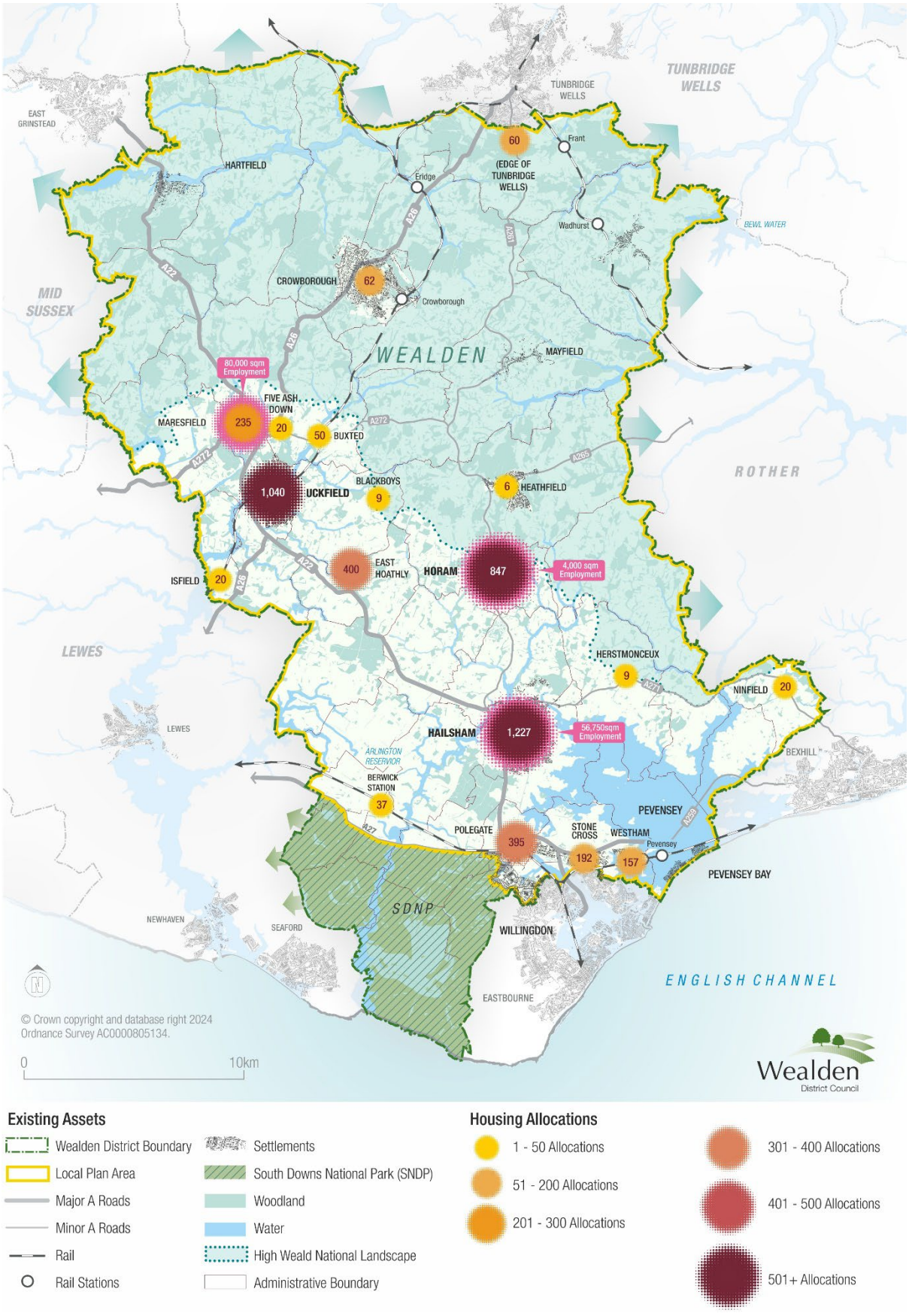
Spatial Option A



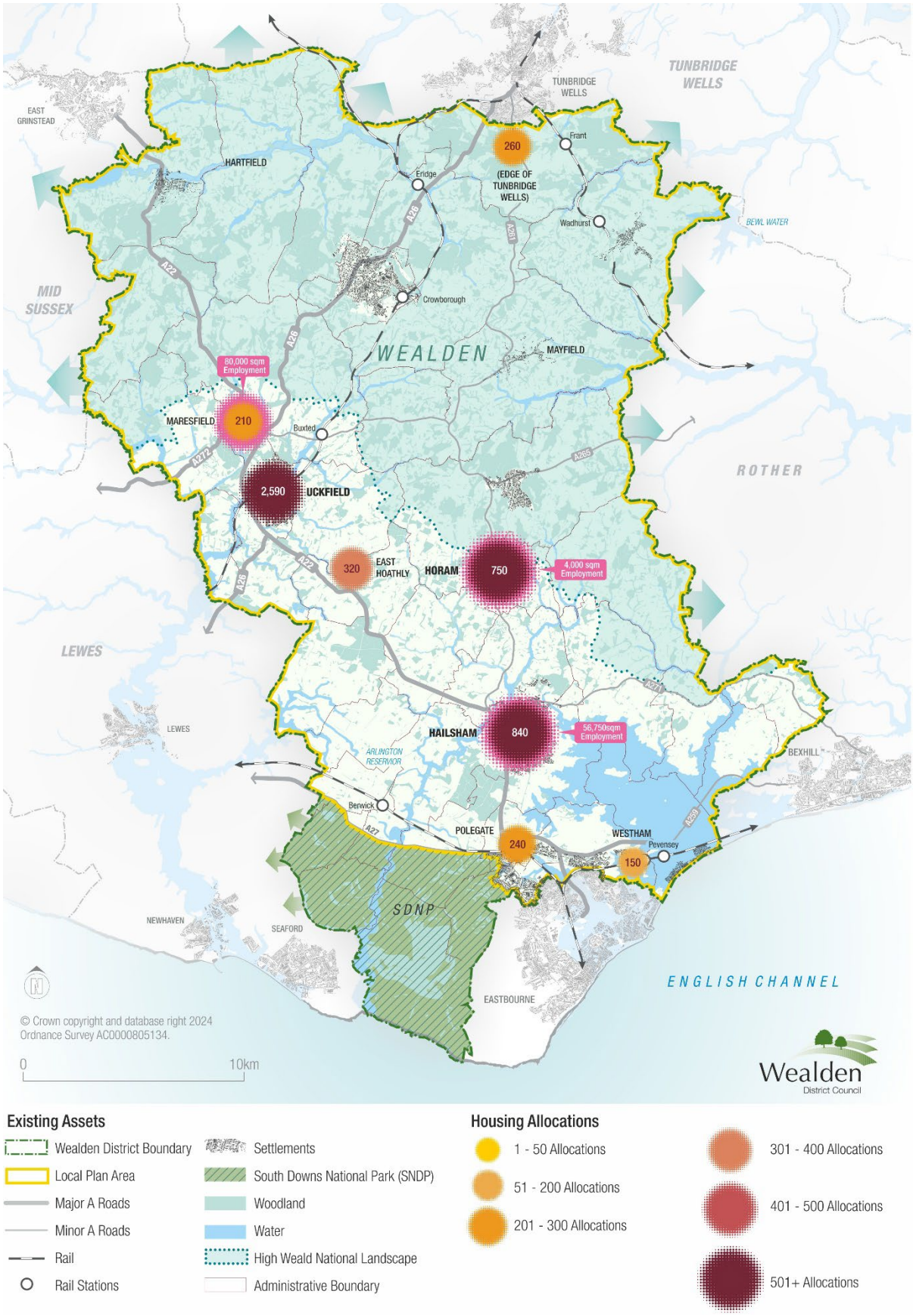
Spatial Option B



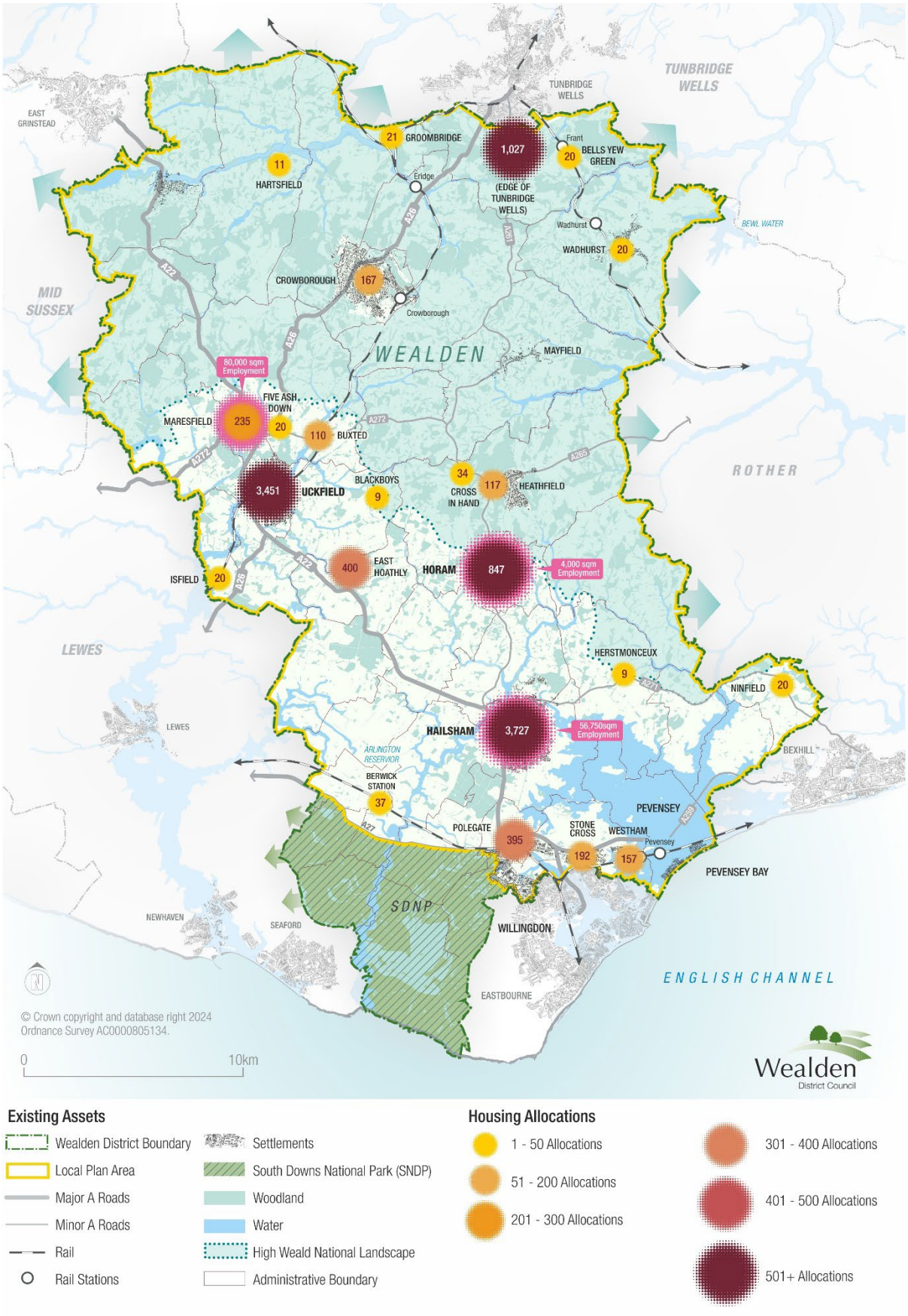
Spatial Option C



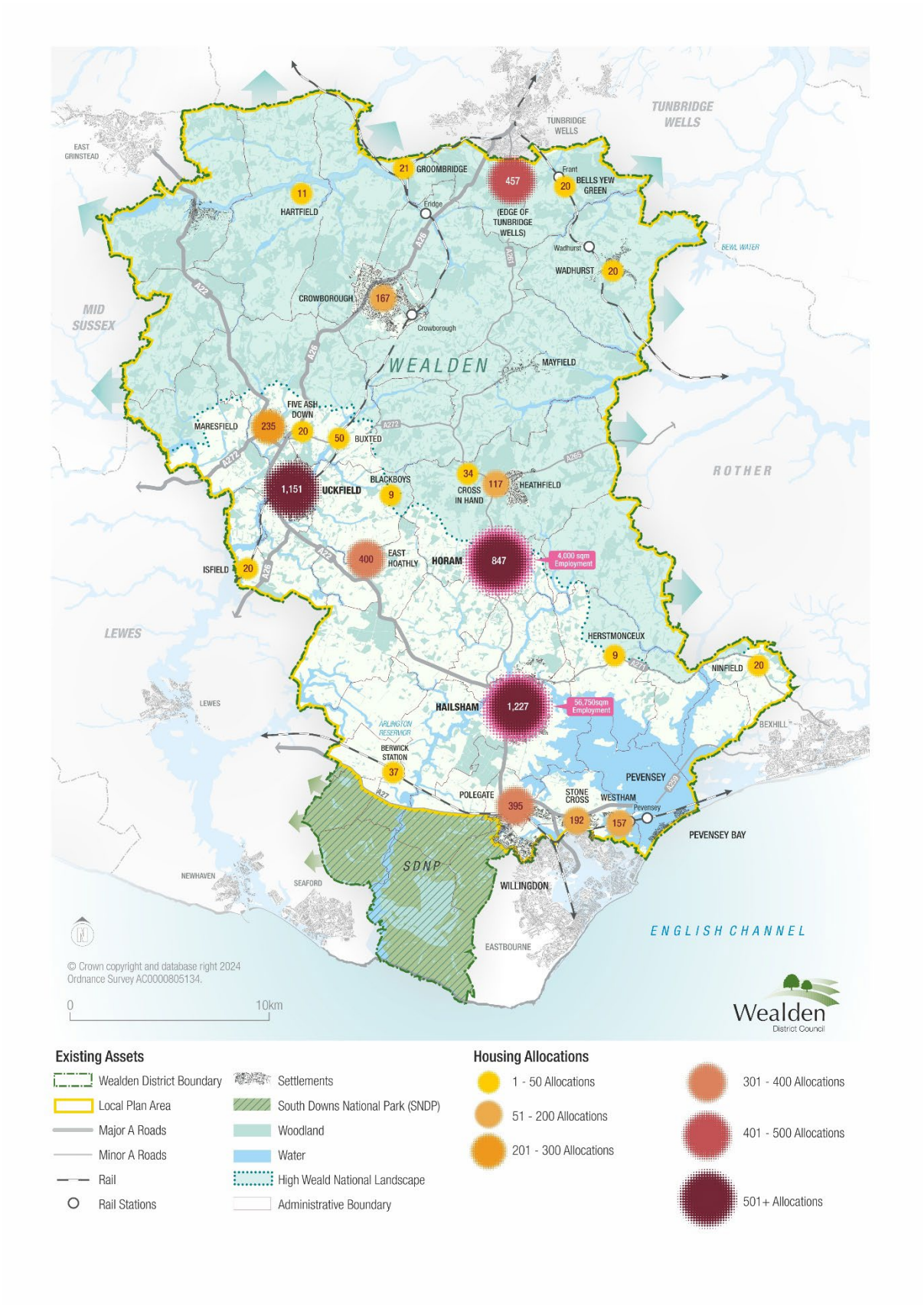
Spatial Option D



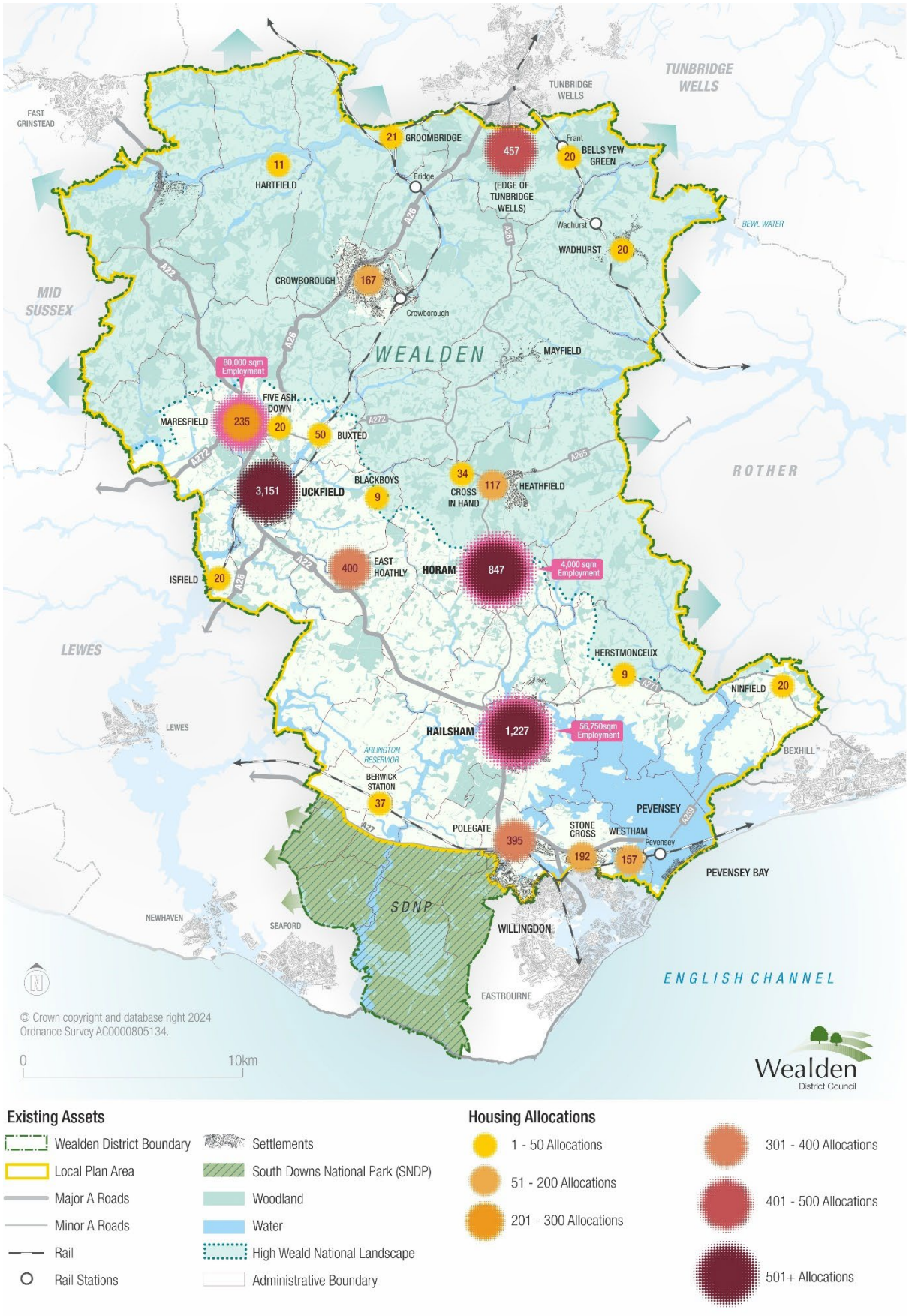
Spatial Option E



Spatial Option F



Spatial Option G



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