Wealden District Council

Wealden Local Plan
Direction of Travel Consultation



November 2020

Wealden
District Council

How to Contact Us

Planning Policy
Wealden District Council
Council Offices, Vicarage Lane, Hailsham, East Sussex BN27 2AX

Telephone 01323 443322
E-mail: planning policy@wealden.gov.uk
Website: www.wealden.gov.uk

If you, or somebody you know, would like the information contained in this document in large print, Braille, audio tape/ CD or in another language please contact Wealden District Council on 01323 443322 or info@wealden.gov.uk

Foreword		2
1	Introduction	6
2	Context	14
3	Structure of Document	18
4	Tackling Climate Change	20
5	Infrastructure to Support Growth	30
6	Housing	38
7	Our Local Economy	56
8	Our Town and Local Centres	68
9	Tourism	80
10	Our Natural Environment	90
11	Our Landscape, Heritage and Cultural Assets	104
12	Design	120
13	Health and Well-Being	130
14	Our Growth Options	144

Foreword

Foreword

It goes without saying that a lot has happened in the past year, not just here in Wealden, but across the nation. In the early part of 2020 we learnt that our Local Plan was unsuccessful at its Examination. Whilst we remain frustrated about the outcome of the Examination, we must now move on and embrace the changes and challenges that producing a new plan offer us.

In particular, in July 2019, the Council declared a Climate emergency. Delivering our Climate Emergency Action Plan needs to be supported in our planning policies if we are going to be successful in reducing carbon emissions and achieving carbon zero. In February 2019, the Government published new national planning policy. Although there is current uncertainty on the future of the planning system with the Government proposing further significant reforms, we have an opportunity to ensure that we are consistent with the latest legislation, policy and guidance including the role that we must take to ensure that future generations have suitable housing to live in as well as the skills to access new employment opportunities that we can provide.

Of course it will be a challenge for us to meet the Government's housing target. But this presents us with an opportunity to deliver much needed affordable homes, in the places that this is most needed, as well as deliver the many benefits that growth can deliver, such as schools, medical and community facilities as well as improvements to our transport system.

Although our town centres and our economy has historically been resilient to economic crisis and change, this last year has seen changes at an unprecedented level. It is too early to understand the full extent of this impact and so we know that we need to be flexible in how we manage the change that we are experiencing now and may experience in the longer term. Ultimately, it is our communities and our environmental needs that matter the most.

We need to of course deliver growth whilst protecting our valued landscape, natural environment and the ecological services that our environment provides, as well as ensuring that our communities have opportunities to live safe and healthy lives.

These issues and challenges and more besides are set out in this consultation document. We need to move forward and plan the best we can for our futures. We are therefore calling on all of our residents, businesses, communities, partners and stakeholders to tell us what is important to you and which direction we should take forward in a new Local Plan, so that we can secure and make the most of the opportunities we have to embrace change in a positive way.



Councillor Ann Newton

Deputy Leader and Portfolio Holder for Planning & Development

Foreword

Chapter 1

Introduction



What is a Local Plan

1.1 The Local Plan is the key planning document for the District. It will set out policies to shape our places, plan and manage growth and guide development across the District over a 15-20 year period.

1.2 In developing the Local Plan we must set out a vision and framework for the future development of the area, address needs and opportunities in relation to a wide range of issues, make decisions on the location, amount and type of development needed and also identify places to be protected and how places will change. Ultimately, the Local Plan will be the main document against which we assess and make decisions on planning applications, which will, alongside other strategies, facilitate growth and change that will support both our new and existing communities.

Why do we want to hear from you?

1.3 This Direction of Travel document is the first stage in our engagement process with residents, businesses and other stakeholders. We want to hear your views as to how the District should accommodate growth and what our future strategic vision should be. The District is facing a number of key challenges, opportunities and critical planning issues and this document sets out what we think they are, and how they could be included in a new local plan.

1.4 Within our Local Plan, we will need to provide both strategic and non-strategic policies, meet the housing and employment needs of the area, meet our and our partner's ambitions and priorities, as set out in various existing and emerging strategies, and set out an overall strategy for the pattern and scale of growth. It is too early to say what this will look like for Wealden and we do not want to set out our framework in isolation, without the input of our communities, businesses, partners and stakeholders. We have some big issues and challenges ahead of us and we know that we need to plan for change. Doing nothing is therefore not an option.

1.5 Ultimately, the Local Plan will affect decisions in places where you live, work, shop and spend leisure time and in preparing the Local Plan we have an opportunity to take a fresh look at how we would like our district to be. We want to know your views so please tell us if you agree, or if we have missed any opportunities or issues you think need to be addressed in the new Local Plan.

1.6 We are committed to engaging with our communities, businesses, stakeholders and partner organisations in preparing a new local plan. This consultation document provides the first opportunity to be involved in the plan making process.

How to make comments?

1.7 The document sets out a number of key themes that we think are important to address in our local plan. Only some of the chapters may be of interest to you. That is perfectly fine and we have structured the document in a way that you can respond to on a theme basis. Under each theme / chapter we have asked a series of questions presented in coloured boxes.

Please let us know if you agree, disagree or if we have missed any issues, opportunities or challenges that we can address through the local plan by responding to these questions. You can respond to the Direction of Travel consultation by:

1. Submitting your comments via our online consultation system using this link https://consult.wealden.gov.uk/kse

   This is the easiest way for you to submit comments and for us to process your comments. You will receive an automatic message to confirm that your consultation response has been received. All comments received will be published on our consultation database once these have been processed. You will also be able to view all other comments made.

2. Or if you are unable to access our consultation portal then you can email us at planningpolicy@wealden.gov.uk or write to us at Planning Policy, Wealden District Council, Vicarage Lane, Hailsham, BN27 2AX. Please ensure that you clearly identify which consultation question(s) you are answering.

1.8 All of the documents relating to the consultation can be found on the Council's website at www.wealden.gov.uk/directionoftravel.

1.9 Given the current restrictions due to the Covid-19 pandemic, it is not possible to guarantee that documents will be available to view at our Council office or other locations. If you have difficulty accessing a copy of the consultation document then please contact us. Please note that the options available will be dependent on any restrictions that are in place at the time.

1.10 If you experience any difficulty in submitting your comments then please contact the Planning Policy Team on 01892 602008 or email us at planningpolicy@Wealden.gov.uk We will only accept responses after the deadline in exceptional circumstances.

1.11 A summary of the responses will be made available following the consultation period. These responses will be fully considered and taken account when preparing the Plan. There will also be further engagement opportunities at later stages in the plan-making process.

How long will it take to produce a new local Plan?

1.12 The detailed timeline for the plan is set out in our Local Development Scheme[1]. A summary is set out below:

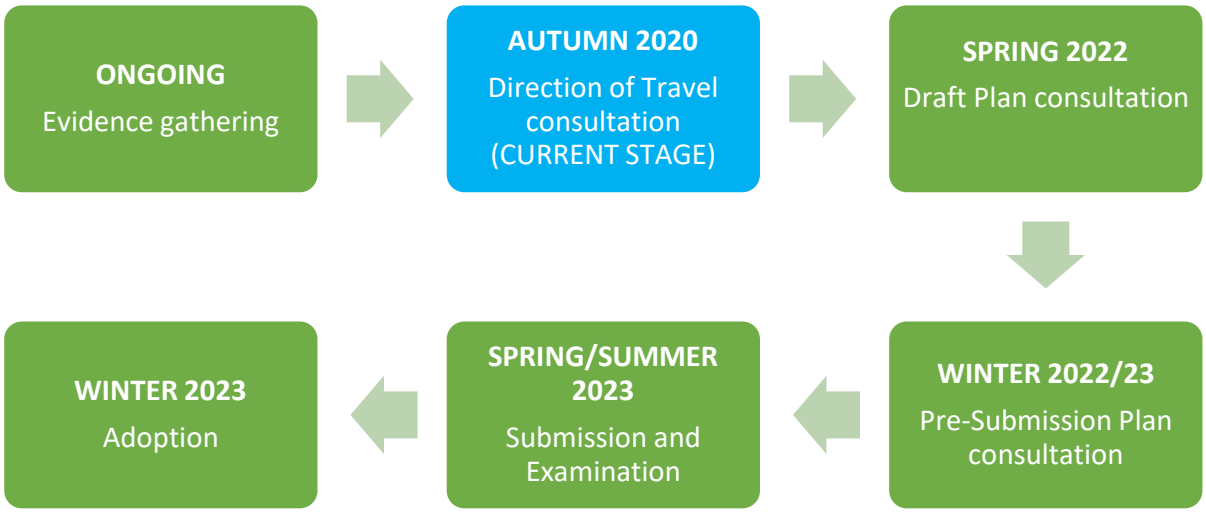


Figure 1 Stages in the preparation of the Local Plan

1.13 Please note that we may in the future need to update these key stages for plan-making in line with any changes to the planning system, following any future reforms to the planning system / legislation, however, we will inform those who are on our local plan database when our consultations will take place.

Section 2: Why do we need a new Local Plan?

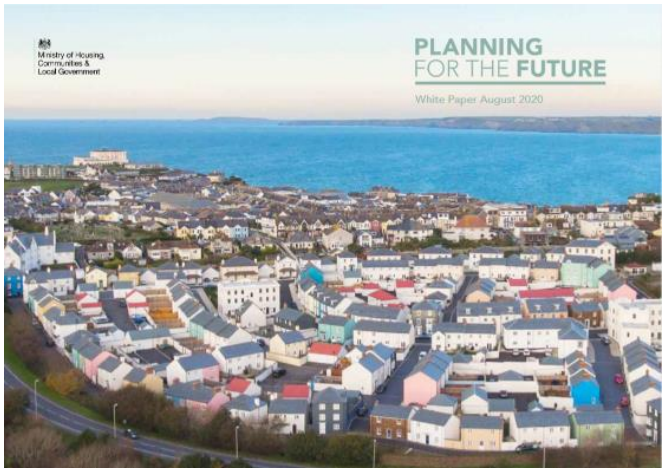
1.14 We are preparing a new local plan for a number of reasons:



Reason 1: Our development plan[2] which covers 2013 – 2027 is currently considered to be 'out of date' and we need to address this to ensure that we can best deliver on the needs and priorities of the district. Local Planning Authorities are required to have an up-to-date Local Development Plan. We are also required to review and assess whether a local plan needs updating every five years to ensure that the plan is both relevant and effective

1 Wealden Local Development Scheme 2020-2023 https://www.wealden.gov.uk/UploadedFiles/Final-LDS-1.pdf
2 The current Development Plan consists of the Wealden Core Strategy Local Plan 2013 – 2027 (adopted in 2013), The Affordable Housing Delivery Local Plan (2016) and saved polices from the Wealden Local Plan (adopted in 1998).

Reason 2: The Government is regularly changing planning policy, guidance and legislation. Since the adoption of our Core Strategy in 2013, significant changes have been made by the Government, not least the publication of an updated National Planning Policy Framework (NPPF) in February 2019, the publication of the Government's Housing White Paper and the Government's Environment Bill, and further planning reforms are underway in the shape of the consultation on the Planning for the Future White Paper (August 2020)[3]. There has also been a number of changes to Permitted Development Rights, the Use Class Order and Neighbourhood Plans are becoming an ever popular mechanism to shape local non-strategic policy and development. We need to make sure we can implement these changes in Wealden through a new local plan.



Reason 3: Our society and economy is changing and we need to take account of these changing circumstances. Since the adoption of our last plan, technology has changed and the way we live, work and use our town centres and green spaces has changed. In addition, as a result of digitalisation and other technological advances, new industries are emerging and existing industries are adapting. We have also more recently experienced changes in our lives due to the Covid-19 pandemic. We would like to be forward thinking, responsive and flexible to both global and local issues and the changes that are taking place. We would also like to maximise the opportunities that change will bring.



3 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf

Reason 4: In July 2019 we declared a climate emergency. We are committed to taking robust action to tackle the local and global threat of climate change, both internally and in partnership with local organisations and residents. We want to minimise our environmental impact by cutting carbon emissions, waste and pollution and have committed to work towards net zero CO_2 emissions for both the Council and also for the district by 2050. Our Climate Emergency Strategy sets out the actions and the approaches we will take in dealing with climate change and we are committed to implementing a plan-led approach to development that minimises and mitigates against emissions from new development. This necessitates a new strategic vision for the future of the district and a new place making strategy for how this will be achieved.



Reason 5: Our district is changing and our population is growing. Similar to other parts of the country, we face the challenge of accommodating new growth and development and the Government has provided us with a high housing target, which we must seek to meet. We need to carefully plan for this growth to ensure the infrastructure is there to support our existing and new communities. We can ensure better connectivity within the district and encourage a change in the way people choose to move around by focusing on walking and cycling infrastructure. We can enable the Districts residents, workers and visitors to travel more sustainably by improving travel choice and connecting communities to destinations, such as shops, health services and parks. And in delivering the required growth we can improve the provision of schools, community, and health and leisure facilities as well as increase and improve our accessible greenspaces. All of this will help us to create a greener, safer, more sustainable and inclusive district.



Future Planning Reform

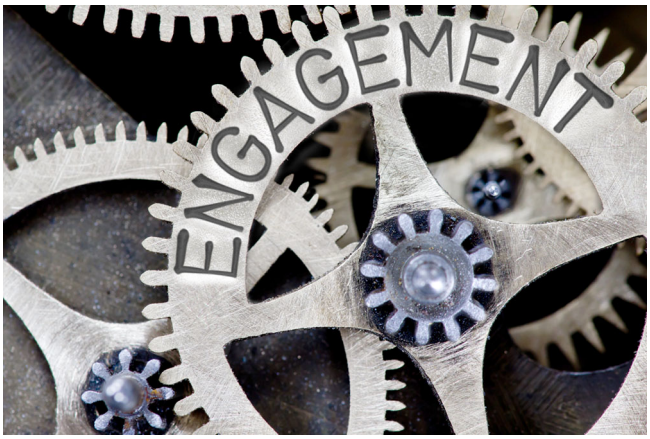
1.15 There is a clear message from central Government that local plan progression is important, hence us undertaking this work. However, we consider it is important to let you

know that we are looking at progressing a local plan at a time when there is no certainty what the Government will be asking of us in relation to the way we undertake plan making.

1.16 The Government White Paper 'Planning for the Future[4]' has set out options for reforming the current planning system. If and when these changes come into force, certain issues will become a matter for national, rather than local, policy in the future.

1.17 However, whatever legislative and national policy changes are made by the Government and indeed any other changes to the planning system that we may encounter, we still consider that it is important and relevant to hear your views of what matters to you. This is especially as community engagement is at the heart of plan-making now as well as in the future. Whatever changes to the planning system are made, we will work towards bringing forward a plan that is fit for purpose to manage growth and change and we will deliver this in an effective and timely way[5].

Working with our neighbours, partners and stakeholders



1.18 Engagement with our communities, partners and stakeholders is a critical component in preparing a local plan. We have already updated our Statement of Community Involvement (SCI) which details how stakeholders and communities will be consulted in the plan making process. In addition, we have also devised an Engagement Strategy, which is published alongside this consultation. This provides detail as to how we will engage with a range of other sectors, such as other organisations and agencies including other local authorities, environmental bodies, businesses, community and voluntary sectors. We know that we cannot deliver on our local plan and strategic ambitions and priorities without this partnership working and having two-way conversations.

Gathering information

1.19 As part of the plan-making process, we are required to underpin our policies by relevant and up-to-date evidence, which is adequate and proportionate, focused on supporting and justifying policies and taking into account market signals. We already have a substantial evidence base which is used to support planning decisions and has helped us provide a solid foundation in which to inform this consultation document. However, we will need to gather more-up-to-date evidence throughout the development of our local plan. We will use our current understanding of the issues as well as the outcome of this consultation to define the

4 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907956/Planning_for_the_Future_web_accessible_version.pdf

5 For further information on the Planning for Reform White Paper please see: https://www.gov.uk/government/consultations/planning-for-the-future

evidence we need. This will include surveys, analysis of existing data, monitoring and research about the economy, our housing, development and social needs as well as our environment. We will also need to understand whether our plan is viable and therefore deliverable.

Sustainability Appraisal and Habitats Regulations Assessment

1.20 As part of the process we are also required to undertake a Sustainability Appraisal and a Habitats Regulations Assessment. These will be undertaken iteratively to ensure that the Local Plan will not result in any adverse environmental, social or economic impacts or adverse effects to European or internationally protected biodiversity sites, respectively.

1.21 Alongside this consultation we have also published our Sustainability Appraisal (SA)Scoping Report. This sets the context and scope of the SA and provides 18 sustainability objectives that will be used to assess the sustainability of the Local Plan.

Chapter 2

Context



Our place

2.1 Located in the economic powerhouse of the South East, close to London and within easy reach of Europe, Wealden is the largest and also the most rural local authority in East Sussex. We have 74 defined settlements, ranging from our larger towns of Hailsham, Crowborough, Uckfield, Heathfield and Polegate and Willingdon to a range of large villages, such as Forest Row and Wadhurst, as well as our much smaller settlements. In general terms, over half of our residents live within our towns, with the remainder of our population living in our more rural areas. Overall, our location as well as our high quality environment, landscape and heritage makes Wealden a very attractive place to live, work and visit.

2.2 Wealden District Council is responsible for planning for 40 out of the 42 Town / Parish Council areas in the district. The South Downs National Park Authority is responsible for planning in Alfriston, East Dean and Friston Parishes. Each of our parishes, towns and villages are unique and special in their own way, each with their own character, history and heritage. Our towns and villages are essential, providing our communities with valuable local services and facilities, reducing the need for our communities to travel further afield. However, we are also located close to much larger towns outside of our district including Tunbridge Wells to the north and Eastbourne to the south, as well as Brighton and Hove and Haywards Heath. These centres also provide important retail, employment, leisure and other services for our communities.

Our population

2.3 The makeup of our population is an important consideration and key to understanding the issues and challenges we will face in the future, for example, having enough suitable and adaptable housing, providing social, healthcare and community facilities to ensure health and well-being, as well as better understanding the needs of our communities now and in the future.

2.4 The latest estimates show Wealden's population at 161,475 (2019) which represents a 10% increase over the last 10 years and a 15% increase since 2001[6]. Our population is projected to increase further over the next 15-20 years at a reasonably steady rate.

2.5 Our birth and death rates have remained relatively stable over the last 10 years. However, the number of deaths in Wealden has been greater than the number of births, which means that population growth has been / is being driven by migration[7]. International migration has historically been low in Wealden with the majority of migration into the district coming from other East Sussex locations and London.

2.6 There are more people in the age categories between 25–65+ moving into the district than out of the district, so we know that Wealden is an attractive place to live for families. We also know that Wealden is an attractive place to retire. However, we are aware that more

6 Office for National Statistics (ONS), Mid-year Population Estimates. Population estimates, 2001-2019 – districts. Available at: www.eastsussexinfigures.org.uk

7 Office for National Statistics (ONS), Vital Statistics and Mid-year population estimates supporting information (June 2020). Births, deaths and natural change, 1991-2019 – districts. Available at: www.eastsussexinfigures.org.uk

people aged between 15-24 move out of the district than in. Wealden is therefore a net exporter of young people and a net importer of older people.

2.7 Projections suggest that by 2033, nearly 32% of Wealden's population will be aged over 65. An ageing population has implications including an increased need for spending on health and social care facilities, but it could also impact economic growth due to a smaller workforce.

2.8 There are of course differences in our population age structure between our different towns and villages, with some towns and villages having a younger population compared with others having a predominately older or ageing population.

Our housing and economy

2.9 The housing market and the economy within the district are heavily influenced by the historic under provision of infrastructure and the influence exerted by other towns and employment opportunities in the wider region.

2.10 Housing market areas are geographical areas defined by household demand and preference for housing, and they reflect key functional linkages between where people live and work, recognising that there are interrelationships between administrative boundaries. From previous work undertaken it was identified that our housing market area is characterised by 50% internal moves alongside strong migration flows with Eastbourne, Tunbridge Wells, Rother District and to a lesser extent Lewes and Mid Sussex Districts. Overall, our location in the southeast alongside the high quality of life on offer and proximity to London and the Crawley / Gatwick area for work, creates a high demand for housing.

2.11 Our location in the southeast has exerted considerable upward pressure on house prices, particularly in the north of the district, where connections to Tunbridge Wells and London are strongest. This has led to a widening gulf between local incomes and market prices, and has led to a significant shortage of market housing that is affordable for local households. The attractiveness of the district as a place to live is also reflected in the rent levels found in the private sector. Overall, affordability is a key issue within Wealden.

2.12 The composition of households has been changing with a trend towards more people living alone. It is estimated that by 2033 just over 30% of households will be occupied by a single person[8]. However, despite this trend, the average household size has remained stable. Overall, the housing stock within the district is very different compared to East Sussex and the South East. We have a very low proportion of one bedroom properties and a high proportion of larger properties.



8 East Sussex County Council (ESCC). Household projections by type and age (dwelling-led), 2018-2033 – districts. Available at: www.eastsussexinfigures.org.uk

2.13 With an increase in population, as well as an ageing population, the mix, type and size of housing that we will need to deliver, including the types of specialist accommodation, will be a particular challenge for our local plan to address.



2.14 In relation to employment and our economy, in 2016, there were around 8,900 businesses in the district with 44,200 jobs. Within the district, 44% of jobs are located within rural areas and 56% within urban areas, which include the larger villages of Wadhurst and Forest Row. Overall, Wealden has an employment density of around 0.42 jobs for every working age resident (aged 16 to 74). In other words, there are more residents aged 16 to 74 than there are jobs, and therefore the district is an overall exporter of labour. We will be updating our evidence base in relation to the economy, especially in light of recent impacts due to the Covid-19 pandemic.

2.15 In addition to the above, a significant proportion of land in the district is used for agriculture, with a new focus on viticulture and associated tourism and local food produce. The role of agriculture and tourism both contribute to the economy of the district.

2.16 Historically we have a low unemployment rate. However, around 1 in 5 of our residents aged 16 to 74 have no qualifications. Work place wages are also generally lower than the national average and this is a key issue in terms of combating out-commuting for work. We also have the more recent issue in relation to the economic impacts of the Covid-19 pandemic in relation to employment and businesses.

2.17 Although in recent years we have made great progress towards increasing job opportunities as well as providing high quality work and commercial spaces such as Chaucer Business Park in Polegate, we are aware that more needs to be done through the provision of high value jobs, as well as supporting businesses to develop and expand in our district.

Chapter 3

Structure of Document



3.1 Based on our work to date, we have been able to identify what we currently consider to be the key issues, opportunities and challenges that we will need to address when taking forward a strategy and policies for growth and change in a new local plan. However, we want to hear your views on these and what you think our vision and objectives for our district should be.

3.2 The key issues, opportunities and challenges are identified under the following themes and we consider that these themes are central to identifying our vision for the district:

- Tackling climate change, achieving carbon zero outputs and improving air quality;
- Ensure that growth and change is supported by infrastructure delivery to meet the needs of our communities;
- Deliver the right type of homes, in the right location and to a high standard to meet local need;
- Support local businesses, increase jobs and ensure a thriving, diverse and a locally sustainable economy;
- Improve our existing tourism offer and increase visitor spend;
- Support and regenerate our town and local centres by attracting the right investment and creating vibrant places that provide for our community's needs;
- Protect and enhance our natural environment and increase biodiversity and the quality of our green and blue spaces;
- Protecting our high quality landscapes, our heritage and cultural assets;
- Deliver high quality places through design, accounting for local character and distinctiveness; and
- Help our communities to thrive, living safe, inclusive and healthy lives.

3.3 Under each of these themes we have identified what we know so far, issues and challenges, what we are already doing, what information we need and what we need to do. We also identify some policy options that we will consider as part of the plan-making process. Under each theme we ask a set of questions and this is your opportunity to tell us how bold we should be in setting our vision and ambitions for our new local plan and how we should provide the framework for growth for the next 15-20 years.

Chapter 4

Tackling climate change, achieving carbon zero outputs and improving air quality





What do we already know?

4.1 We know that addressing climate change, including transitioning to a low carbon future and mitigating and adapting to climate change, is a key principle that we both need to and are required to deliver.

4.2 Ahead of producing a local plan, it is important to understand climate change in the context of our district. Understanding this will assist us to consider what more we can and should be doing to address climate change as well as consider our options in plan making for doing so.

4.3 In terms of what we know, we know that Wealden's per capita carbon emissions have been reducing year on year. In 2018, Wealden District's total emissions were 616 $ktCO_2$, down 32.4% from 2005. Use of land for agriculture, forestry and other similar uses had the effect of reducing the 2018 total emissions from 757.6 $ktCO_2$ to 616 $ktCO_2$ (a reduction of 141.5$ktCO_2$). To achieve our decarbonisation targets, our emissions as a district need to reduce further.

4.4 In terms of what we know, we know that Wealden's per capita carbon emissions have been reducing year on year. In 2018, Wealden District's total emissions were 616 $ktCO_2$, down 32.4% from 2005. Use of land for agriculture, forestry and other similar uses had the effect of reducing the 2018 total emissions from 757.6 $ktCO_2$ to 616 $ktCO_2$ (a reduction of 141.5$ktCO_2$). To achieve our decarbonisation targets, our emissions as a district need to reduce further.

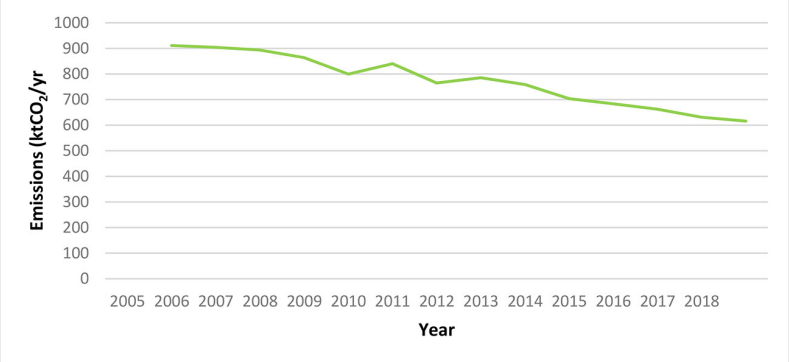


Figure 2 Total Wealden District CO2 (2005-2018)

4.5 To reduce our emissions, we first need to know what our key carbon contributors are. The sectors and fuel types that contribute to CO_2 emissions are provided in the figure below

4.6 We understand that approximately half of the CO2 emissions (47.2%) in the district are related to the transport sector and around a third are from our homes (34.7%). Finally, non-domestic buildings, such as business premises, public buildings and agriculture accounts for 15.2% of the total.

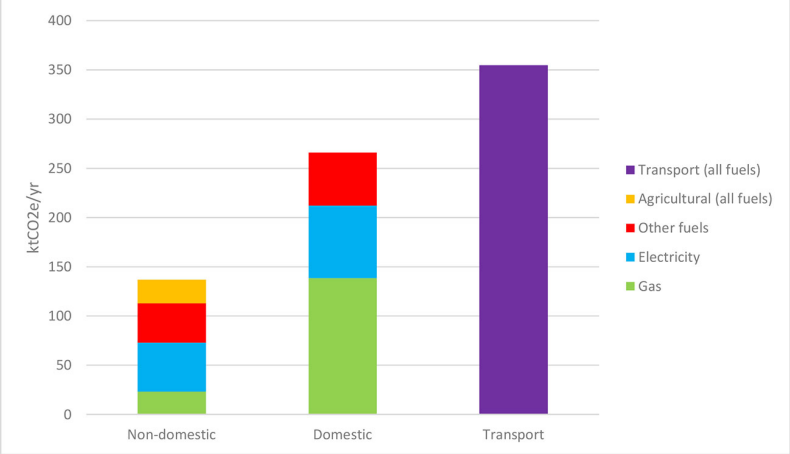


Figure 3 Total Wealden District CO2 emissions by sector and fuel type (2018)

4.7 The predominant fuel type consumed in the domestic sector is gas, which is mainly used for heating and hot water. This is followed by electricity and petroleum products, which signals that a relatively high proportion of homes in Wealden use oil for heating. For non-domestic sectors electricity is the dominate fuel type used, closely followed by petroleum products and then gas. Despite recent shifts towards hybrid and full electric vehicles, the transport sector remains almost exclusively powered by petroleum products.

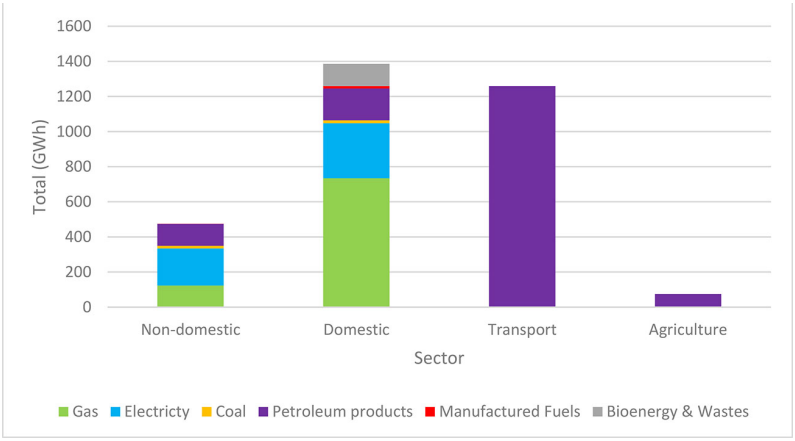


Figure 4 Fuel consumption in Wealden by sector and fuel type (2018)

What are our key issues and challenges?

4.8 Combating climate change and ensuring that the district is prepared for climate change (i.e. temperature increases, increased rainfall, and droughts) is crucial for Wealden's communities, our environment and economy. Delivering a sustainable built environment will be key to achieving this, as well as a key driver to assist in meeting net-zero carbon emissions by 2050. Our key issues and challenges are set out below.

4.9 Air pollution is associated with a number of adverse health impacts, which most often affect those most vulnerable. In Wealden, road traffic is the dominant source of air pollution with several major routes passing through the district. Whilst it is good that there are currently no areas in Wealden where people are exposed to levels of pollutants in excess of the UK Air Quality Objectives, we know the congestion on our roads has been increasing, due to continued high car usage.

4.10 This issue is made particularly challenging because we are a large, predominantly rural district with relatively poor connections to other nearby towns that offer us additional

employment, leisure and services our communities rely upon. In addition, especially in our most rural areas, our communities lack a connected and regular public transport network. Despite some recent improvements, there is also limited cycling and walking infrastructure to reach key locations. All of these factors lend themselves to a heavy reliance on the use of our cars to travel to where we need to go.

4.11 We will need to think very carefully about how we can address the reliance on the car through the location and design of development and also how we can facilitate change by encouraging more sustainable forms of travel, electric vehicle take up and a step change in our travel choices.



Flooding at Alfriston

4.12 The district is also susceptible to flooding from all sources and this risk will increase with climate change. The main sources of potential flooding within the district are river flooding from the River Cuckmere and River Uck, tidal flooding as a result of sea defences being breached, primarily at Pevensey and Pevensey Bay and also from surface water flooding following periods of intense rainfall and from inadequate drainage systems, including blockages within culverts or drains. To protect our existing and planned communities we need to prepare for increased flooding events in the future as a result of climate change where more extreme weather events involving heavy and intense rainfall are likely to occur in the future. We will also need to consider how we can ensure that new development is appropriately flood resistant and resilient and does not increase flood risk elsewhere through appropriate mitigation.



4.13 Conversely, the South East of England is in an area that is classed as seriously 'water stressed' which means that at times the demand for water can be higher than the amount available. We are at a risk of drought if reservoirs, rivers and aquifers are not replenished by winter rainfall. This is a situation that is likely to be made worse by climate change as a result of drier, hotter summers and even though we may experience more intense rainfall events, where these take place in the summer months the water is likely to runoff quickly over the land and evaporate instead of replenishing our water supplies. Water use restrictions could have significant consequences for our communities, our environment and economy in the future. Therefore, as the demand for water will grow alongside housing and population growth, there will be a need for greater water efficiency as well as considering options for either new or enhanced sites for water abstraction to meet demand.

4.14 Our natural environment is likely to face significant challenges with temperature increase potentially resulting in species migration and habitat loss whilst drier summers are likely to impact the growth of our flora and fauna. Extreme rainfall is also likely to impact our natural environment, for example in soil being washed away. However, our natural environment also offers us significant potential to combat climate change if it is managed and looked after properly – providing opportunities for carbon storage/sequestration; summer cooling from trees and flood mitigation.

What are we already doing?

4.15 Climate change emergency: Achieving net-zero carbon emissions by 2050 and combating climate change is a huge challenge ahead of us and one that we are committed to achieving. On 24th July 2019, the Council declared a 'Climate Emergency' and committed to delivering on a number of actions. The Council recognised the need to respond quickly to the 'emergency' and so by the end of December 2019, we had:

- written and approved our Climate Emergency Plan;
- identified and analysed the Council's own emissions;
- analysed total emissions across the district (from industry, domestic and transport),
- modelled future emissions trends up to 2050; and
- identified the key priority areas of action needed to achieve net-zero.

4.16 Our Climate Emergency Plan, cited as one of the 'pioneering early plans' by the South East Climate Alliance (SECA), represents the Council's initial response, enabling us to swiftly identify and initiate actions.

4.17 We have already taken action to mitigate and adapt to climate change including:

- Delivery of a number of domestic energy efficiency advice schemes (pop-up shops, smart meter roadshows, grant promotions etc.) and across all housing tenures in the district, to improve energy efficiency, reduce emissions and tackle fuel poverty;
- Promotion of waste reduction initiatives, including the development of a single-use plastics reduction plan, promotion of the Refill scheme, and delivery of campaigns to increase recycling, reduce food waste and inspire community action. For example, the Wealden Spring Clean has successfully engaged groups across the district, stimulating wider environmental action;
- Supporting local households at medium to high risk of flooding and encouraging resilience by providing free property surveys and grant funding toward the cost of flood defence measures;
- Facilitating the provision of 12 electric vehicle charging points within the district, including 2 at the Council offices in Hailsham; and
- Granting planning permission for 8 solar photovoltaic farms (plus 2 extensions) and one wind farm in the district. Collectively, these consents provide for a total capacity of 71MW, estimated to provide enough power for just under 20,000 homes.

4.18 We are also currently working on a range of projects including:

- An exploration of low carbon and renewable energy investment opportunities;
- The low carbon redevelopment of Vicarage Field in Hailsham and potential to co-locate renewable technology such as a heat network, solar PV and battery storage, and incorporation of high building thermal standards and EV charging onsite;
- The development of a pilot project to help accelerate the uptake of renewable energy among SMEs in the District;
- Assessment of our public car parks to install electric vehicle charge points for public use;



- Working with our district and borough partners, towns and parishes, and communities to stimulate action, establish synergies and identify opportunities for joint working; and
- Working with our partners to support the Riding Sunbeams project aiming to directly connect solar power generated in the District to power our trains.

4.19 We also undertake work in other climate change related areas so that we develop in a way that respects environmental limits and improves quality of life. We do this by:

- Air pollution: We currently monitor air quality across the district, working with East Sussex County Council and Sussex Air Quality Partnership. The partnership provides assistance to members and information to the public via its web-site, with recent air quality data, news updates, educational resources, links and other services such as airAlert.
- Flooding: We locate development away from areas at high risk of flooding. We consult East Sussex County Council, as the Lead Local Flood Authority (LLFA) for managing flood risk, on planning matters. The LLFA provide guidance on the implementation of sustainable drainage systems (SuDS) to developers and ourselves, to ensure that development is flood resilient, resistant and does not impact land elsewhere. We are also undertaking work with Eastbourne Borough Council and East Sussex County Council on the hydrology of the Eastbourne and South Wealden catchment area and the risk from groundwater flooding within the south of the district, to better understand flood risk. Together with Eastbourne Borough Council we have also engaged consultants to undertake fluvial modelling so that we can better understand flood risk in the southern area of the district adjacent to Eastbourne.
- Water stress: We have continued dialogue with South East Water over the expected requirements in terms of water supply for the district, including the option for safeguarding land at Arlington Reservoir for a potential expansion in reservoir capacity. We also continue to seek the highest possible water efficiency standards in development, working within the framework of national legislation.



Arlington reservoir



4.20 Electric vehicles: There has been a significant increase in the number of Ultra Low Emission Vehicles (ULEVs) registered in Wealden between 2011 and 2019, with 668 registrations by the end of September 2019. In 2011 the numbers were just 23.

What further work is needed?

4.21 The Climate Change Emergency declared by the Council and the direction of government policy will assist us to deliver a local plan that positively addresses climate change. We want our policies to be effective and deliver real results on the ground.

4.22 In addition to finding ways that we can take forward the actions detailed in the Climate Change Emergency Plan we will need to gather further information and evidence to inform our policies. This will include:

- Undertaking Strategic Flood Risk Assessments to understand the extent of flood risk from all sources within the district, taking account of the impacts of climate change on this risk;
- Work with the Lead Local Flood Authority to better understand hydrology in key locations and understand how Sustainable Drainage Systems (SuDS) can be best used to protect the Pevensey Levels and new and existing communities;
- A study to understand the potential to deliver renewable and low carbon energy and heat generation;
- Liaising with our partners to consider sustainable travel options including through East Sussex County Council's Local Cycling Walking Infrastructure Plan;
- Modelling the impacts of transport growth that will result from new development;
- Understanding the transport improvements that will be required as a result of additional growth in the district;
- Investigate opportunities and the potential for carbon off-setting and carbon sequestration, including the potential for natural solutions to sequester and store carbon;
- Gathering information on the take up of electric vehicles within the district and the potential for further developing the electric vehicle charging network district wide; and
- Gathering information to consider whether there is a justifiable case for setting more stringent water efficiency standards.

What do we have to do?

4.23 The Local Plan will have a key role in the transition to a zero-carbon future and the policies that it will contain will shape decisions and will promote environmentally-friendly choices in areas such as built development, energy and transport.

4.24 Our future local plan policies will need to allow both new and existing communities to be developed in ways that reduce energy consumption as well as reducing the emission of greenhouse gases. They will also need to provide the framework to help us adapt to climate change by future-proofing both new and existing homes, businesses, public buildings and the natural environment for our existing and future communities.

4.25 Delivering sustainable development including achieving this through good design and addressing our 'climate emergency' will continue to be a high priority. However, to achieve this we will need to consider a number of key matters:

- We need to consider the policy context for addressing climate change and how we can deliver on climate change at the district / local level. Currently, legislation, national policy and guidance provides the context, however the latest Government White Paper on Planning Reform talks to amending national policy and legislation for this to effectively play a role in mitigating and adapting to climate change and maximising environmental benefits. It also talks to facilitating ambitious improvements in energy efficiency standards for buildings to assist in delivering net-zero carbon emissions by 2050. We are currently uncertain whether these standards will be set in the planning or building regulations arena or both.
- We need to consider the ways that we can minimise climate change through policy as well as investigate the use of natural solutions to climate change mitigation and adaptation including habitat protection, restoration and creation to enable carbon sequestration / storage and flood risk management;
- We need to understand the fast evolving technological response to climate change so that we can ensure that we have the policy framework in which efficient and appropriate solutions can be supported;
- We need to consider how we can promote greater water efficiency as well as working with partners to consider options for either new or enhanced sites for water abstraction to meet the demand that arises from housing and population growth;
- We need to think carefully about how we can address the reliance on the car through the location and design of development;
- We also need to ensure that any future planning policies look to encourage more sustainable and active modes of transport such as improving walking and cycling infrastructure as well as supporting the development of an electric vehicle charging network in the district. This will help encourage a move away from petrol and diesel vehicles. This could include the provision of suitable and appropriate cycle storage in new developments as well as cycle infrastructure to encourage cycling.
- We need to consider our response to opportunities to produce clean energy in the District, specifically though further solar and wind generation but also through other renewable sources and storage.

Direction of travel policy options:

As part of our local plan we will consider the following:

1 Delivering improvements in energy efficiency for new and existing developments;
2 Facilitating the provision of water efficiency and renewable energy installations in developments;
3 Facilitating the provision of decentralised energy networks and renewable energy developments;
4 Encouraging active and sustainable transport to improve air quality and reduce carbon emissions including the provision of walking and cycling infrastructure within major new developments;
5 Encouraging ULEV network and infrastructure;
6 Enabling carbon sequestration / storage in appropriate locations and as part of developments;
7 In liaison with partners, encourage and seek measures to help manage flood risk and deliver suitable sustainable drainage systems as part of developments;
8 Safeguard land to deliver sufficient water storage capacity (i.e. increasing reservoir capacity at Arlington);
9 Implementing parking standards for development; and
10 Ensuring that new development is designed to consider climate change from project inception, taking account of the whole life of the development.

Question 1

What do you think?

1 Are there any issues or challenges that we have missed?
2 Do you agree with the proposed policy options?
3 Do you disagree with any of the options?
4 Are there any other policy options we should be considering?
5 Do you have any other comments in relation to how we can plan to combat climate change?

Chapter 5

Ensure that growth and change is supported by infrastructure delivery to meet the needs of our communities



What do we know?

5.1 The consideration of and effective provision of infrastructure and community facilities is crucial to ensure sustainable growth and healthy communities. The local plan provides us with an opportunity to carefully consider and manage patterns of growth and what infrastructure will be required to be delivered alongside this growth. A key national policy driver is that significant development should be focused in locations which either are, or can be made, sustainable.

5.2 As well as 'traditional' infrastructure such as roads, schools and rail, we will also need to consider community and social infrastructure such as village halls, as well as green infrastructure, which is considered in chapter ten and of course that needed to respond to the challenges posed by climate change, such as sustainable transport and the offering of a genuine choice of transport modes. Infrastructure is a key aspect for our local plan because not only will it be essential in order to make development acceptable, but development can also provide opportunities for both short and long-term major improvements to our existing infrastructure provision, whether this be transport improvements or the delivery of new health, community or cultural facilities. It is also vital to help us meet the needs of our communities and to ensure that we can sustain and deliver our economic, environmental and climate change objectives.

5.3 We know that certain types of our existing infrastructure require improvement. For example, we know that we have issues in relation to road capacity at certain locations in the district. In some instances we have detailed plans and funding commitments in place, in others we are seeking external funding, however this is not universal. It is however important to be clear that the planning system alone is unable to solve this problem. Under planning laws, we are not allowed to require new development to address existing issues, only mitigate the impact of the new growth proposed. To solve pre-existing problems, or those made worse over time that are not linked to new development, we must work with our infrastructure partners to seek alternative funding opportunities.

What are our key issues and challenges?



Polegate train station and Buses in Uckfield

5.4 A key issue for the district is car dependency, particularly in rural areas, and therefore the Council needs to consider ways to move away from the highest emitting forms of transport (i.e. the private motor vehicle) towards the lower emitting forms of transport where at all possible – known as 'modal shift'. It is acknowledged that some trips in the district, particularly for those residents in the most rural areas, may still need to be made by car, however, we will need to encourage and promote sustainable modes of transport (including cycling/walking and public transport) for all new developments to reduce capacity on our roads, to address health and well-being of our communities as well as meet climate change objectives.

5.5 The road network, particularly in the south of the district and on major routes (particularly junctions on the A27/A22) is already in a situation of stress and has required interventions to improve capacity and reduce congestion. The further growth required for the new Local Plan, particularly for residential development, will need to be considered in this context and solutions will be required in order to deliver growth. However, the delivery of strategic highway improvements is dependent on the ability to secure substantial external funding. Working at the earliest opportunity with key local stakeholders, strategic transport providers and developers will therefore be key to enable the funding and delivery of strategic road and rail infrastructure. We therefore have to plan to cater for such transport impacts and moreover, towards ensuring that residents have the choice to use public transport (or other sustainable modes of transport) to make key journeys.

5.6 The capacity of primary and secondary schools is dependent on the number of new homes built in the district and particularly family sized homes. We know that a substantial number of new homes will be required in the district over the plan period and therefore new school places will need to be catered for. In order to deliver all of the growth within the new Local Plan, it will be necessary to deliver education provision proportionate to the level of growth in locations which maximise the accessibility for new residents.

5.7 The capacity of existing GP surgeries is also dependant on the number of new homes built in the district. The challenge will be supporting the Clinical Commissioning Group in ensuring that new GP surgeries (when required) are in appropriate locations and meet resident's needs. In order to deliver growth within the Local Plan, it will be necessary to deliver healthcare provision equal to the level of growth and in locations which maximises the accessibility to new residents.



Buxted Medical Centre

5.8 During the preparation of the Council's Core Strategy Local Plan (adopted in February, 2013) it was apparent that additional discharges into the Pevensey Levels may become an effective limit to housing growth until an acceptable solution for treating wastewater had been identified. Southern Water is working to complete these upgrades by the end of 2021. Depending on the direction and pace of new growth the Council may need to consider this issue further and will be proactive in working with Southern Water and other associated statutory bodies in relation to sewerage capacity.

5.9 There have also been challenges in terms of telecommunications infrastructure within a largely rural district and this is a particular issue with many people and businesses working from home during the Covid-19 pandemic and requiring fast broadband speeds. National planning policy confirms that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. It notes that local policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. We will aim to support such infrastructure providers through planning policies to ensure telecommunications infrastructure is provided where it is needed.

5.10 There have also been challenges within the district relating to the loss of community assets, such as individual village shops and public houses, to other uses (particularly residential) and this may be exacerbated by the impacts of the Covid-19 pandemic. This is particularly important in rural settlements where only a single community facility exists (i.e. public houses). The Council will need to reassess such settlements for their community facilities and to identify deficits in provision. The protection of existing community assets within our villages will also be critical in addressing this issue.



Kings Arms Public House, Rotherfield

5.11 A key issue for the Council is that we do not directly provide or have responsibility for a number of the key infrastructure items considered above including the highway network, gas networks, electricity networks, network rail, wastewater infrastructure or water supply infrastructure and are therefore reliant on the relevant statutory body to fulfil their duty in this respect. We will therefore require coordination between Wealden and the other infrastructure providers to ensure that all development needs are catered for and new infrastructure delivered when it is needed.

5.12 Lastly, the Council's ability to secure infrastructure funding from new development is currently split into two separate arrangements named Planning Obligations (or Section 106 agreements) and the Community Infrastructure Levy (CIL). Planning Obligations are secured from new development and relate to the direct impacts of such development (such as highway access improvements or affordable housing), whilst CIL is a charge that is applied to all new development in the district (subject to a number of national exemptions) that is on the CIL charging schedule (currently this includes new residential development and some retail development) at a fixed rate.

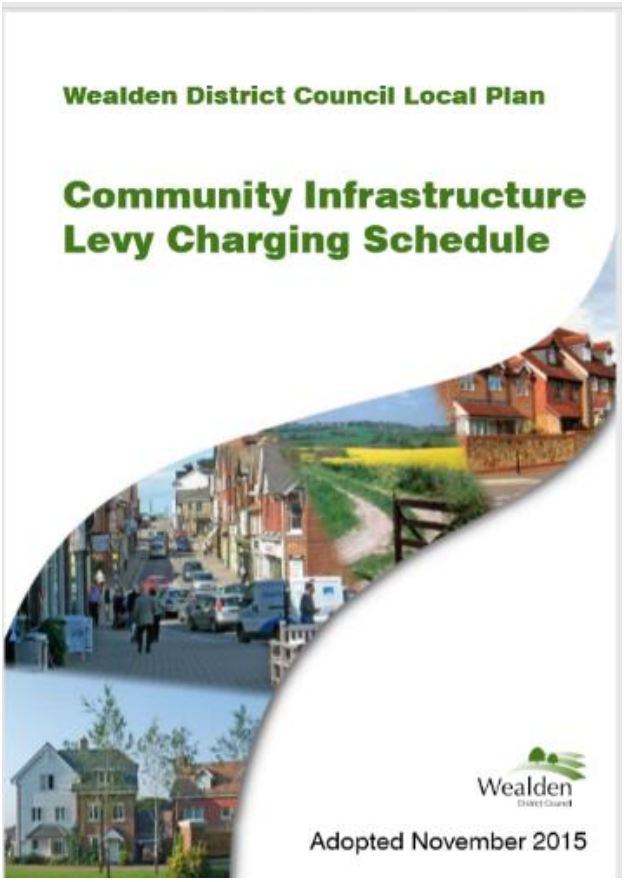
5.13 The Government's White Paper proposes that the existing system for delivering infrastructure be replaced with a new, consolidated 'Infrastructure Levy', which will mean the current system of Planning Obligations would be abolished. If this is taken forward, this would result in significant changes to the way development contributions are secured. In addition the current rules on the financial viability of development are critical to determining the amount of CIL and Developer Contributions that can be collected by us towards infrastructure projects. We will continue to work with government to maximise the extent of developer contributions in order to deliver all the infrastructure we require.

What are we already doing?

5.14 The Council continually liaises with infrastructure providers on the key issues and challenges outlined above and has jointly commissioned a number of studies, particularly on transport issues (with East Sussex County Council) in recent years. This will continue throughout the new Local Plan process and beyond, and the Council will continue to draft an Infrastructure Delivery Plan in support of our new Local Plan. This will provide details as to the infrastructure required, funding arrangements, schemes status and timeframe for delivery and this will be continually under review.

5.15 In order to inform the Infrastructure Delivery Plan, the Council already holds meetings with various stakeholders who provide infrastructure within the district and this information is collected to inform what is required and when, as well as the funding needed to achieve those goals. The Council also provides infrastructure providers with the information they need (such as development projections within the district) to ensure that they are aware at an early stage what development is expected to come forward. This liaison is crucial throughout the local plan process to ensure that infrastructure is delivered when it is required.

5.16 The Council has already adopted a CIL charging schedule that was effective from 1 April 2016 and collects monies for infrastructure funding from new residential and retail developments within the district. For the 2019-20 monitoring period, the Council collected just over £2 million in revenue that could be spent on infrastructure to support new development within the district. Between 1st April 2016 and 31stMarch 2020, the Council has collected a cumulative total of over £13 million from CIL.



5.17 We also secure individual Planning Obligations (or Section 106 Agreements) with new developments that can include highway access improvements, sustainable urban drainage systems, open space and other infrastructure assets as part of new development, either directly or through monetary contributions.

What further work is needed?

5.18 As we develop the spatial distribution of residential and non-residential development for the new Local Plan, we will work with all our infrastructure providers and neighbouring Councils to test our options and ensure that any necessary mitigation measures can be

provided. Where delivery of infrastructure would be a particular challenge (new roads, schools, waste water treatment works for example) we will ensure that this is a truly iterative process. Ensuring that from the outset the plan is one that can be delivered, together with all necessary infrastructure.

5.19 Once we have developed our overall strategy for growth we will test this to identify all non-strategic infrastructure requirements and secure appropriate mechanisms to deliver proportionately with the new growth.

5.20 Depending on the timing of any Government updates to collecting funds for infrastructure, we may need to review our CIL charging schedule in parallel with the Local Plan to ensure that the levy charge remains appropriate over time. A review of the CIL charging schedule should take account of market conditions and infrastructure needs, as well as new development in its area. The Council will aim to do this by the end of 2023 to support infrastructure provision contained within the Local Plan unless other mechanisms are required as a result to Government changes to the planning system.

What do we have to do?

5.21 In order to support the delivery of infrastructure to meet the needs of our communities, we will:

- Work closely and collaboratively with the significant infrastructure providers that play a role within Wealden including East Sussex County Council, Southern Water, South East Water, Network Rail, Highways England and Clinical Commissioning Groups to ensure that the right infrastructure is provided at the right time and right location;
- Work closely and collaboratively with neighbouring local planning authorities, including Kent County Council, Surrey County and West Sussex County Council to identify cross boundary infrastructure issues and funding where this is required; and
- Continue to support Neighbourhood Plans that can allow local communities to set out a positive vision for new development in their area and set priorities for local infrastructure spending.

Direction of travel policy options

We are considering the following policy directions:

- To help create sustainable communities and reduce the need to travel by private motor vehicle, planning polices will support development by ensuring that the right infrastructure is provided in sustainable locations at the appropriate time;
- Planning policies will seek to promote the use of sustainable transport modes (i.e. walking, cycling and public transport) and will favour development in locations where existing sustainable transport routes are in place (or where this can be provided);

- Planning policies will seek to direct new development allocations to sustainable locations and to be designed to support sustainable modes of transport, as well as provide suitable vehicular accesses and parking;
- Planning policies will support the provision of new social infrastructure where it is needed;
- Planning policies will support the provision of new education infrastructure in locations where it is most needed to meet the requirements for school places;
- Planning policies will support the provision of new telecommunications infrastructure where it is required;
- Planning policies will support the provision of new health infrastructure (particularly GP surgeries) where it is most needed;
- Continue to have firm planning policies that seek to resist the loss of existing facilities (i.e. public houses, village shops, community halls) where possible;
- Allocate sites for social and community uses to meet the needs identified by Wealden District Council and/or other infrastructure providers and to aim to locate these where they are most needed and within walking distance;
- Continue to consider the impacts of large new developments within Wealden and the impact they have on existing social and community infrastructure within towns/villages;
- If required, subject to Government planning reforms, the Council will seek to review its CIL Charging Schedule by the end of 2023 to ensure that new development is making an appropriate contribution to infrastructure provision; and
- The Council will progress an overall assessment of the financial viability of new development contained within the Local Plan to support the review of the CIL charging schedule.

Question 2

What do you think?

6 Are there any issues or challenges that we have missed?
7 Do you agree with the proposed policy options?
8 Do you disagree with any of the options?
9 Are there any other policy options we should be considering?
10 Do you have any other comments in relation to how we can support the delivery of infrastructure within Wealden?

Chapter 6

Deliver the right type of homes, in the right location and to a high standard to meet local need



Housing Need and Delivery - What do we know?

6.1 The Council delivered 828 (net)[9] housing units in the 2018/2019 period and 1,034 (net) in 2019/20. This is the largest amount of new homes built within the district in a twenty year period, as can be seen below.

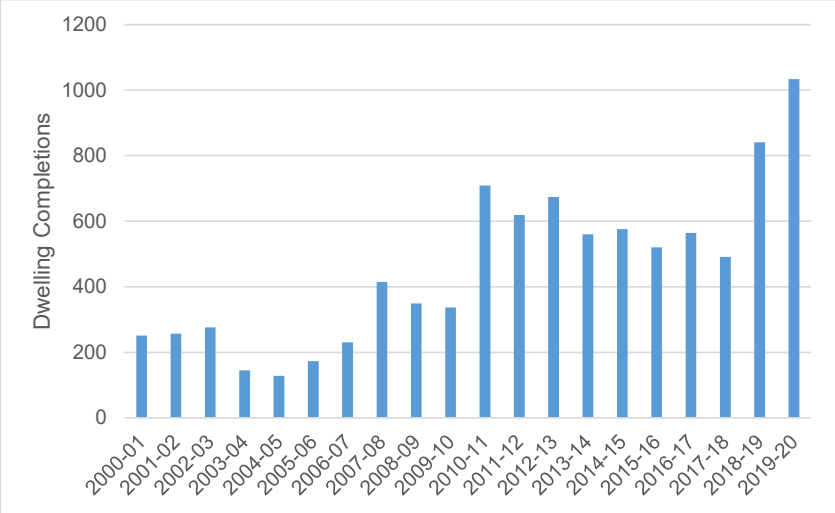


Figure 5 Annual Net Housing Completions in Wealden District - 2000-01 to 2019-20

6.2 However, although our housing delivery has increased we are not currently meeting our requirement to identify five years' worth of deliverable new homes. As of 1st April 2020, we can only meet 3.85 years of our five year supply requirement, which is higher than the 3.67 years recorded as of 1st April 2019. In August 2020, we were required to publish a Housing Action Plan[10] due to not meeting the Government's Housing Delivery Test (HDT). The test identified that we have delivered 1,896 dwellings out of the required 2,185 (net) between 2016-17 and 2018-19, a measurement of 87%. In short, these measurements show that more housing is needed within our district and that homes need to be delivered at a faster rate than they are currently.

6.3 We recognise that these figures are alarming and that many of our communities consider that we are already planning for enough, or even too many homes. We are sympathetic to these views, however, we must also be clear from the outset that our housing requirement is one that is set for us and one that we must meet to assist in delivering the national shortage of homes. Under current national policy, we know that not doing so would lead to planning by appeal, delivering growth in areas that we have not chosen, not being able to adequately plan for the infrastructure we need to support growth. It may also lead to negative consequences for the environment and our communities. A local plan that delivers on our full housing need requirement will provide us the opportunity to take control, ensuring that we have a say in the sustainable growth of our district.

6.4 The Council's latest self-build and custom-build (as of 1st September 2020) shows that there were 94 individuals (and no groups) enrolled on the self-build and custom housebuilding register, with just over half of applications originating from within the district.

9 Please note that this figure does not include the area of the district that is located within the South Downs National Park
10 Wealden District Council – Housing Action Plan, August 2020

6.5 In 2016 we engaged consultants to provide a Housing Needs Assessment[11] to understand our current and future housing market and how this relates to housing growth and housing needs in Wealden. We have begun work to update this work but in the meantime the study provides us with context to help us consider how we can best shape and improve the delivery of new homes in the district.

6.6 At the time of the 2011 Census, Wealden had the largest population out of all East Sussex local authorities with 148,915 people living within 62,676 households. It is estimated that the population stood at 161,475 (2019) and 70,029 households (2019). In terms of the proportion of the existing dwelling stock by type in 2011, the key characteristics of the dwelling stock for Wealden at that time are shown below. Most notably, settlements in the north of the district have higher proportions of larger 4 and 5+ bedroom stock (particularly in Crowborough St Johns) and settlements in the south of the district have higher proportions of smaller 2 bedroom stock (particularly Polegate and Hailsham) (2011 Census).

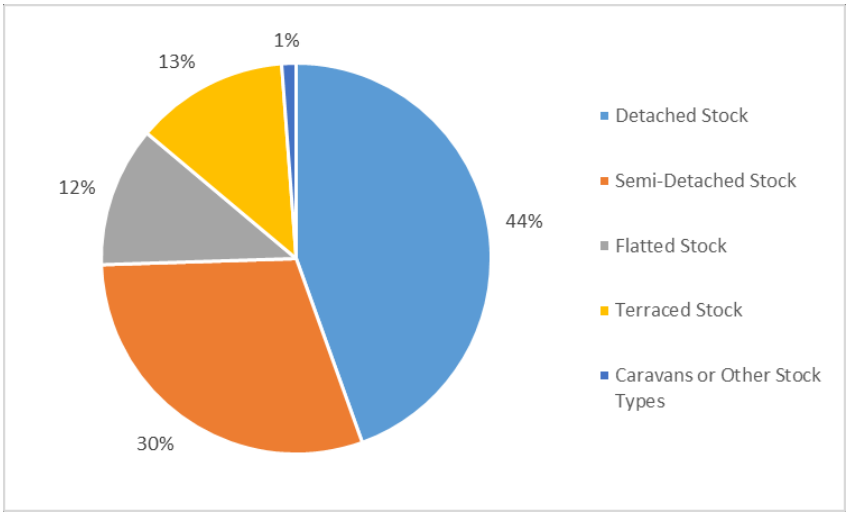
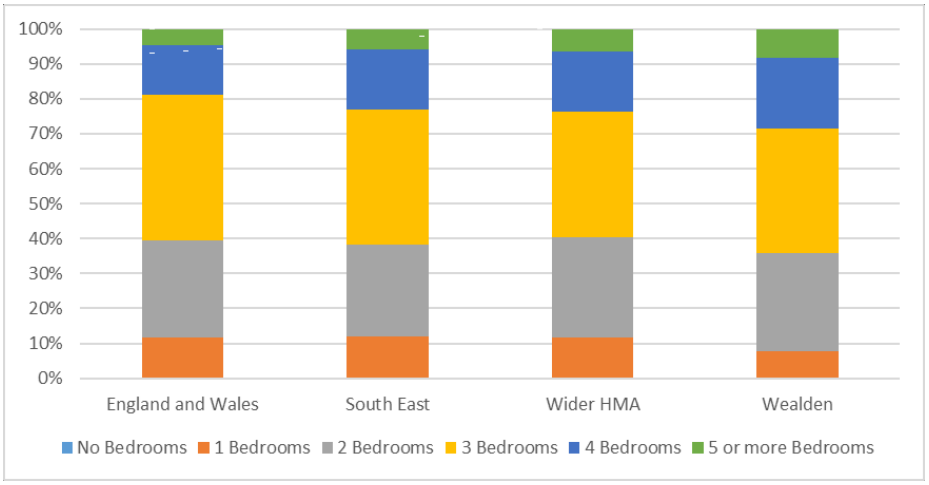


Figure 6 % Profile of Dwelling Stock by Type (2011) for Wealden



6.7 The report also provided us with a profile of the housing stock in terms of the number of bedrooms for each dwelling at the time of the 2011 Census, which is shown in the figure below. This data is

Figure 7 % Profile of Housing Stock by Number of Bedrooms (2011)

11 Wealden District Strategic Housing Market Assessment (SHMA), August 2016

shown with comparisons to the country, region and sub-region known as a Housing Market Area (HMA)[12]

6.8 In short, the above statistics show that Wealden's existing housing stock contains a high proportion of larger dwelling stock, with far less 1 bedroom homes than the national, regional and sub-regional average, as well as more 4 bed and 5 bed (plus) homes. It is also known that both detached and semi-detached homes dominate the district as approximately 74% of all homes in the district are included in these two categories.

6.9 Of Wealden's housing stock at the 2011 Census, approximately 42% is owner occupied (outright), 37% is owner occupied (with a mortgage), 11% is private rented, 8% is social rented, 2% are living rent free and 1% is shared ownership. In comparison to the wider sub-region, there were more homes that were owner occupied (outright) than in other local authority areas and less private rented and social rented stock.

6.10 There is a substantial level of under-occupancy in Wealden, higher than the other wider HMA local authorities and regional and national levels. This is associated with the ageing nature of Wealden's population and a higher proportion of empty nesters living in family homes and may also reflect the relative affluence of the population. There are significant and complex variations in the proportion of under-occupancy across the district.

6.11 Although there are variations across the district, Wealden has an average household size of 2.3 persons per household, with an average of 6.1 rooms and 3 bedrooms per household.

6.12 Local plans must meet the accommodation needs of all communities and this includes the needs of the gypsy and traveller community and travelling showpeople. In the last study undertaken by the Council in 2016, the district had 51 authorised permanent pitches (households). Following a change made by Government to the definition of gypsy and travellers for planning purposes in 2015, the Council undertook a Gypsy and Traveller Accommodation Needs Assessment[13]. At this time, the assessment, published in November 2016, indicated that for the period from 2016/17 to 2037/38, there was an additional need for 21 permanent pitches for 'travelling' households in the district.

6.13 To date, the number of new pitches/plots being delivered within the district for the gypsy, traveller and travelling showpeople community has been limited.

Housing Need and Delivery - What are our key issues and challenges?

6.14 There are a number of key challenges that the district faces in terms of housing delivery and indeed a key aim of the Government nationally is to deliver at least 300,000 new homes per year by the mid-2020s. The housing target for the district is derived by central Government.

12 At that time, this included Eastbourne Borough Council, Lewes District Council, Mid Sussex District Council, Tunbridge Wells Borough Council and Rother District Council.

13 Wealden Gypsy and Traveller Accommodation Needs Assessment, November 2016.

6.15 In 2013 we had a housing target of 450 homes per annum, as set out in our Core Strategy Local Plan. This has substantially increased and we now have a housing target of 1,225 homes per annum. This is currently the highest out of all East Sussex local authorities.

6.16 In addition to a substantial housing target, other local authorities can currently ask us to deliver some or all of their housing need where they can demonstrate that they are unable to deliver their housing target due to the constraints of their administrative area. This is a legislative process under the Localism Act 2011 and part of our Duty to Cooperate. We do not currently know whether the Duty to Cooperate process will exist in the future or what guise it may have in the Government's plans to reform the planning system. We also do not currently know the exact amount of unmet housing need we may be asked to deliver for other local authorities. However, until this has been confirmed we will continue to work with our partner local authorities to identify and test any unmet need and whether there are opportunities in our district to deliver this.

6.17 Another unknown is that associated with economic uncertainty as a result of the Covid-19 pandemic and what impact this may have on housing delivery and housing market activity (i.e. sales, lets etc.). We are also uncertain how the EU Transition may impact the local housing market.

6.18 However, despite these uncertainties we do know that different groups of people will need different types of accommodation, for example, growing families may wish to up-size, others such as our older population or younger population may wish to purchase smaller properties either as a first home or to downsize, for example. We will of course also require homes suitable for families. A challenge will be delivering the right size, type and tenure of homes in the locations where they are most needed and where certain types of homes will be the most sustainable locations for their occupants.

6.19 We will also need to balance our housing stock to meet our community's needs. We are aware that we have an ageing population. If the projections are correct those aged 65+ will make up 34.6% of Wealden's population by

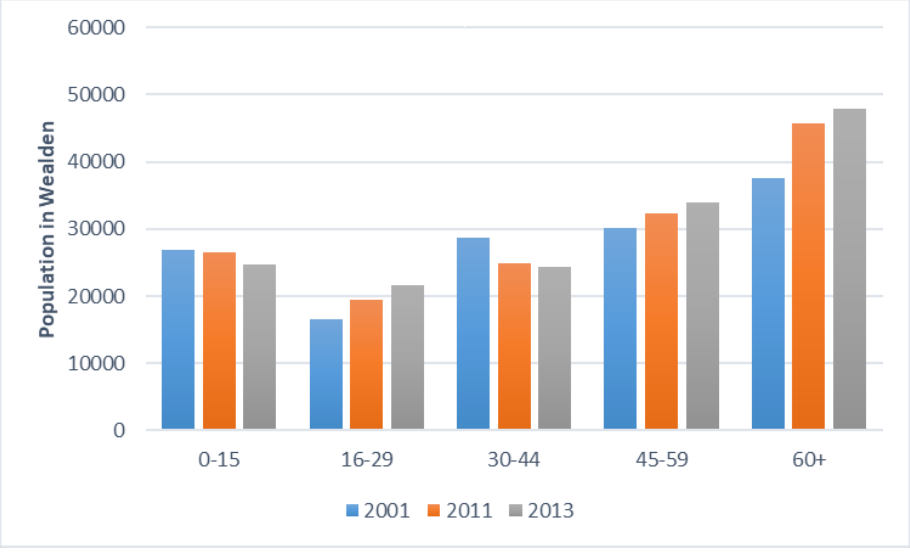


Figure 8 Wealden Population Age Distribution (2001, 2011 and 2013)

2041[14]. Whilst there is a national trend towards an ageing population, this trend is occurring at a greater extent in Wealden, which has the potential to lead to significantly increased pressure on health and social care, a need for aids, adaptations and sheltered accommodation. A challenge is to establish how we can best provide for our ageing population and the types of accommodation we should be delivering particularly in terms of retirement housing (i.e. extra care provision, retirement/sheltered housing and residential care).

6.20 Additionally, it is predicted that the number of people with a disability in Wealden will increase from 25,676 in 2018 to 36,531 in 2032. Another challenge therefore is to deliver homes that are designed to be adaptable to changing needs for those with disabilities, specialist needs, mobility problems or learning difficulties. Many people would like to continue living in their home and in many instances simple alterations such as widening doors and providing sloped access would be sufficient to meet a person's needs. However, the ability to make alterations is dependent on the original design of the home.

6.21 Historically in Wealden we have had a lower proportion of private rented sector homes in the district. This can cause issues where a proportion of our population do not qualify to be added to our housing register due to their income being too high (above £30,500), but cannot easily access good quality homes in the private rented market. There is a gap, therefore, between those that qualify for that type of accommodation, to those that are unable to afford a shared ownership property who would benefit from easier access to a private rented property. Although the private rented sector is relevant to families and older persons, one of the key drivers for the private rented sector is younger person households i.e. those wishing to leave home, those who are in employment and those post further education. With house prices rising, this has led to an increase of younger households wishing to house share. However, there are very few HMO properties in Wealden and it is not uncommon for young people to move to neighbouring locations in order to find appropriate property for house sharing or to rent. We will therefore need to consider how we can best provide for our younger population or those wishing to house share.

14 East Sussex in Figures.

6.22 The Government has introduced nationally described space standards for all new homes in 2015. The standard deals with internal floor space within new dwellings and is suitable for application across all tenures. Depending on the size and types of houses being delivered there may be a need to identify locally specific internal space standards. However, taking a different approach would need to be fully justified taking into account evidence such as the size and type of dwellings currently being built in the area as well as financial viability (i.e. the impact of adopting those standards) for house builders. This issue will be considered for the Local Plan moving forward.



6.23 National planning policy confirms that the re-use of redundant or disused buildings in the rural areas for residential purposes will be encouraged where it can be demonstrated that it does not result in the need for additional buildings, the rural building is genuinely capable of conversion without significant alteration or change and where it does not cause harm to the landscape or amenity of the area. The conversion of rural buildings to housing does provide significant housing supply within rural areas of our district and therefore this issue will need to be addressed within the Local Plan.

6.24 In rural areas, national planning policy confirms that Council's should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing sites would help to facilitate this. Such sites are normally small scale and situated on the edge of existing rural settlements where local planning policies usually preclude the development of general market housing. As noted above, affordability is a key issue for Wealden, particularly in rural areas and the development of a planning policy for rural exception sites will be considered as part of the local plan process.

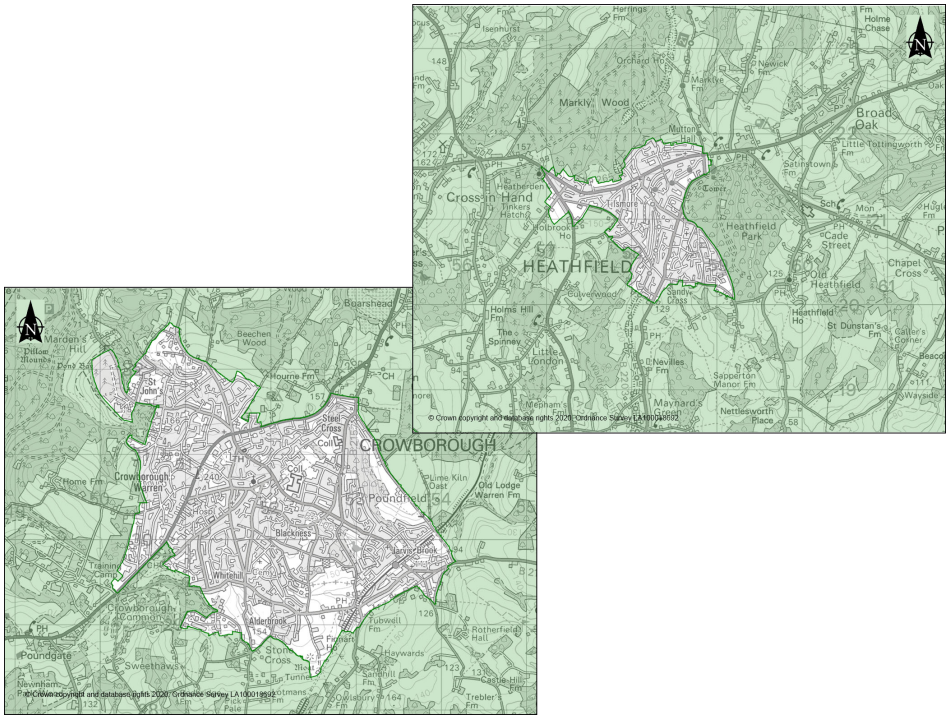


Figure 9 Crowborough & Heathfield

6.25 More generally in rural areas, and specifically the High Weald Area of Outstanding Natural Beauty (AONB), the delivery of new homes in such locations is restricted by national planning policy. This confirms that the scale and extent of development within these designated areas should be limited and that planning permissions should be refused for major development other than in exceptional circumstances. Both Crowborough and Heathfield are market towns located within the High Weald AONB (and enclosed by the designation) and are populous towns, with Crowborough having the largest population of any town in Wealden at the time of the 2011 Census. A key issue moving forward with the Local Plan is the delivery of new homes in these sustainable locations given the existing national planning policy in place and how to maintain such towns that may rely on new residents to prosper.

6.26 Under current national planning legislation, there is an existing requirement to help facilitate self-build and custom-house-building and the Council needs to consider its options to fulfil its duty in this regard. In short, the definition of self-build and custom house-building is where an individual, or association of individuals, build or complete houses to be occupied as homes by those individuals. The Government's Planning for the Future White Paper confirms that self-build and custom house-building remains a key area of Government focus and that it wishes to see areas allocated specifically for self and custom-build homes and that local authorities should meet the requirements identified in their self-build and custom house-building registers. This is a key issue for the Local Plan moving forward.

6.27 Community Land Trusts (CLTs) are also discussed within the Government's Planning for the Future White Paper. Community led housing is where a community is integrally involved throughout the development process (i.e. what is provided and where), there is a long term formal role in the ownership, stewardship and management of the homes by the community and affordable homes are protected in perpetuity for local people. There may be a role for the Local Plan to play in supporting such community led housing in our villages and towns where

such development is needed, particularly in terms of providing affordable homes for local people.

Housing Need and Delivery - What are we already doing?



Woodpecker View, Crowborough

6.28 We have also set up our own housing company, Sussex Weald Homes, to build a range of homes to provide for first-time buyers and those who want to down-size. We have now completed our first scheme at Woodpecker View in Crowborough. This scheme delivered 34 homes which included eight one bedroom flats, 18 two bedroom houses and eight three bedroom houses. 22 of these homes are for market sale, 10 are provided as Council rented accommodation and two are for our own housing stock for shared ownership.

6.29 We have produced a Housing Strategy - 2020-25[15](adopted in June 2020) that provides main aims for housing within Wealden. The focus of our strategy is on increasing housing supply, improving housing quality and providing housing advice and support for individuals and communities.

6.30 We have recently published a Housing Action Plan[16]following the results of the Government's Housing Delivery Test (HDT) in February 2020 where our housing delivery fell below 95% of our housing requirement. The purpose of the Housing Action Plan is to identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures we will take to improve levels of delivery.

6.31 We have also made a number of improvements to our planning service to ensure that it improves both the speed and quality of its decision-making for housing development. This includes the establishment of a specialist validation team to provide the initial processing of planning applications, improving both the speed and quality of its pre-application advice service and improving its digital access to planning services to name a few. The Council also regularly engages with developers to understand issues and discuss planning matters.

6.32 We have supported planning applications that meet our needs in relation to the right mix, type and tenure of housing to assist in the provision of suitable homes for local residents within the district.

15 Wealden District Council – Housing Strategy 2020-25 (June, 2020)
16 Wealden District Council – Housing Action Plan (August, 2020)

6.33 In addition to this, we have re-branded our existing sheltered housing stock to retirement living and this work is continuing. One example is the £3.5m remodelling of Joan Hughes Court retirement living scheme in Polegate designed to upgrade residential and communal facilities.



Joan Hughes Court, Polegate

6.34 We are removing the outdated bedsit accommodation and by reducing the overall number of units on-site, when the re-modelling work is completed in 2021 we will have created first-class facilities with 60 fully refurbished and accessible one bedroom flats.

6.35 We are also actively investigating funding opportunities to support the delivery of new homes including through Council initiatives. For example, the Council is developing plans for the redevelopment of Hailsham Town Centre, through our Hailsham Aspires project following the Council's acquisition of the Vicarage Field's shopping centre, to provide new homes in a sustainable town centre location, alongside other uses.

6.36 The Council is also continuing to work closely with East Sussex County Council to explore the need for and develop any specialist accommodation and to review the current supply of supported accommodation across East Sussex.

Housing Need and Delivery - What further work is needed?

6.37 The Council last published its Strategic Housing Market Assessment (SHMA) in August 2016. We will need to gather more up-to-date information in order to define our housing market area, reflect new housing trends and market signals, as well as incorporate new national planning policy guidance on housing matters. As part of this work we will include an assessment of the future needs of different groups, including families with children, older people, people with disabilities, service families and people wishing to build their own homes, along with gypsies and travellers. With this information to hand, the Council will then need to consider what policies and housing allocations are needed to ensure that we are delivering the right accommodation in the right locations where it is needed. This will include delivering homes on both small and large sites, to meet local need.

6.38 We will also need to test and understand the potential for delivering housing growth, both our own as well as any proven unmet need from other local authorities. This will be

achieved through a Strategic Housing and Economic Land Availability Assessment (SHELAA). The Council published its last SHELAA in January 2019. Since this time we have started work to up-date this including updating the methodology and undertaken a call for sites. This is where landowners are able to submit their land for a formal assessment as to the sites suitability and deliverability for development. The evidence is then used to assist in plan making, providing us with options to make the best decisions for growth. Further information on this including how to submit a site is provided on the Council's webpages[17].

6.39 We will also need to understand our potential and the ways we can support innovative developers and house builders, including small and medium sized enterprises (SMEs) and self-builders, those looking to build a diverse range of types and tenure of housing, and those using innovative modern methods of construction. This could also include looking at how we can deliver modular or park home style accommodation.

Housing Need and Delivery - What do we have to do?

6.40 In order to support the delivery of the right type of homes, in the right location and to a high standard to meet local need, we will:

- Work closely and collaboratively with our Town/Parish Council's, East Sussex County Council, Team East Sussex, neighbouring local authorities and local businesses and residents to ensure that the right types of homes are delivered in the right location;
- Deliver the key actions and responses identified within the Council's Housing Action Plan (August, 2020)[18].
- working closely with internal colleagues and other external organisations that drive the delivery of new housing developments across the district; and
- Continue to support and provide advice to Neighbourhood Plan groups so that community visions can be realised including a positive vision for housing in their area (including housing allocations).

Direction of travel policy options

As part of our Local Plan we will consider the following:

- The provision of a clear strategy to bring sufficient land forward at a sufficient rate to meet our housing target and delivering these in the most sustainable locations for growth, taking into account land constraints and limitations;
- To provide planning policies that seek to both allocate and support the delivery of a mix of housing sites in the district, including those from small-to-medium sized house builders, to ensure housing delivery over the entire plan period;

17 Wealden District Council – Strategic Housing and Economic Land Availability Assessment (SHELAA)
18 Wealden District Council – Housing Action Plan (August, 2020)

- If required, we will seek to provide housing requirements for designated neighbourhood areas which reflects the Council's overall planning strategy for the pattern and scale of development;
- Encouraging the delivery of a range of housing to meet the needs of different groups of the community including increasing specialist accommodation, retirement / sheltered housing, residential and nursing care homes, accessible and/or adaptable homes;
- Improve opportunities for self-build or custom build housing, community-led housing and build to rent;
- To maximise opportunities to deliver on brownfield sites where possible, particularly within existing towns and villages, that benefit from existing infrastructure provision and can achieve higher densities;
- Encouraging the right types, sizes and tenures of housing within the district to meet our community's changing needs;
- The new Local Plan will ensure that new housing development will be developed at appropriate densities, that accessibility standards (i.e. lifetime homes) and space standards are also appropriate to ensure good quality development;
- To provide planning policies that consider the appropriateness of converting rural buildings for housing, the development of single dwellings in the countryside and the redevelopment of existing housing stock; and
- To safeguard existing gypsy, traveller and travelling showpeople sites from redevelopment to other uses and to meet the future accommodation needs of gypsies, traveller and travelling showpeople as part of the new Local Plan.

Question 3

What do you think?

11 Are there any issues or challenges that we have missed?
12 Do you agree with the proposed policy options?
13 Do you disagree with any of the options?
14 Are there any other policy options we should be considering?
15 Do you have any other comments in relation to how we can plan to deliver housing, including the range, type, size and tenure?

Affordable Housing Needs and Delivery

6.41 Affordable housing need refers to households who lack their own housing or are living in unsuitable housing and cannot afford to meet their needs in the private housing market. It is for those in housing need that the state needs to intervene in the market to ensure all households have access to suitable housing.

6.42 In 2019/20, 273 affordable dwellings were delivered in the district. This equates to 26% of all new homes built in 2019/20 being defined as affordable. The current target is to deliver a level of 35% affordable homes on sites that meet the affordable housing requirement trigger. Of those affordable housing completions, 67 were completed by the Council, whilst the remainder (206 affordable homes) were completed by registered providers of social housing.

6.43 In common with the rest of the South East, the cost of housing is extremely high in Wealden. In 2019, the average house price in the district was £312,500, an increase of 17% on the average house price in 2015. There are disparities in terms of house prices and affordability between the north and south of our district, with the north historically being more expensive and therefore less affordable than the south.

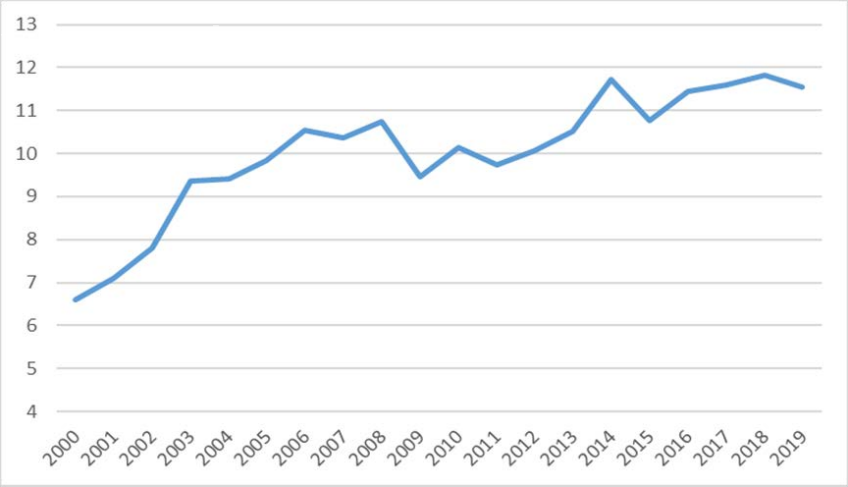


Figure 10 Median Affordability Ratio for Wealden since 2000

6.44 In 2019, the average house price is 11.55 times the average working persons' income for the district and as can be seen in the figure below, affordability has worsened over time[19].

6.45 In terms of the Council's own housing waiting list, as of the 27th April 2020 there were 827 households waiting for housing on the Council's housing register, which shows that there is a high demand for affordable housing in the district. Of these households, 49.6% require a 1 bedroom property; 29.8% require a 2 bedroom property; 16.7% require a 3 bedroom property; 3.9% require a property with 4 bedrooms and 0.12% require a property with 5 bedrooms.

6.46 In 2018, the number of local authority houses for rent within the district was 2,927, with 2,488 being provided by housing associations and social providers.

19 House price to workplace-based earnings ratio, MHCLG, March 2020

Affordable Housing Needs and Delivery - What are the key issues and challenges?

6.47 Affordability is an issue in our district. Many households in Wealden are unable to afford to buy a property due to affordability issues and would need to borrow 11.55 times their income to be able to buy a property. Our 2016 Housing Needs Assessment identified that only 51% of Wealden households could afford market housing[20]. In East Sussex, it is only Rother district which is less affordable than Wealden, however, affordability in Wealden is greater than Mid Sussex and Tunbridge Wells.

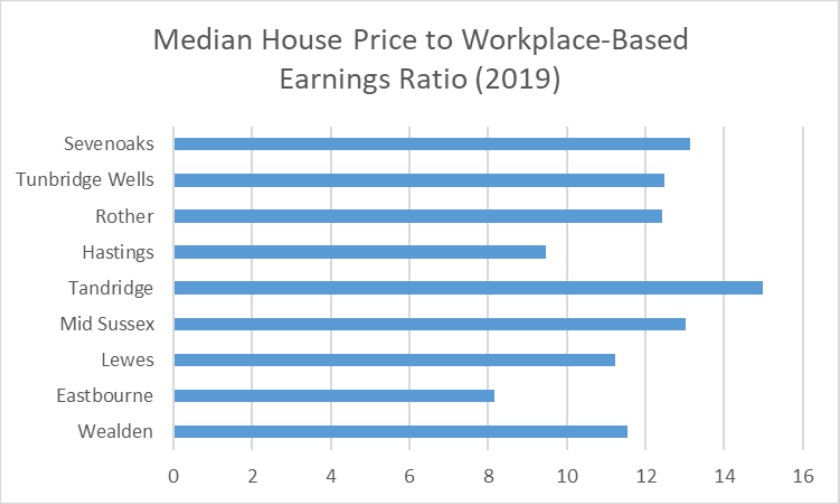


Figure 11 Affordability of Local Authority Areas within East Sussex or Neighbouring Wealden

6.48 Alternative options to market housing in the district are limited since shared ownership remains in short supply and so is private rented accommodation. In addition, due to supply issues, private rented accommodation is not affordable for many households due to the Local Housing Allowance which is based on lower quartile rents.

6.49 The Council's housing waiting list indicates that there is high demand for affordable housing and that the provision of one or two bedroom accommodation for social rent is the main priority.

6.50 Our data has identified that historically we have not provided enough affordable housing from new housing developments to meet our needs in recent years. Therefore, a key issue for the Local Plan is to find ways to increase the supply of affordable housing across the district.

20 This assumes that up to 30% of a household's income is spent on housing, where house purchase uses a 75% loan-to-value (i.e. a 25% deposit).

6.51 The Government's Planning White Paper confirms that affordability will continue to be a major factor in defining the Council's overall housing need assessment - i.e. the least affordable areas will continue to have the highest housing need.

6.52 A significant proportion of our district is a designated Area of Outstanding Natural Beauty (AONB). In the AONB large scale development should normally be restricted, unless exceptional circumstances apply. Conversely, this area is where the affordability pressure is most acute and so we will need to carefully consider how and where we can meet our affordable housing need in this area.

6.53 Similar to providing specialist accommodation, viability is the main reason for under delivery of affordable homes. If developer profits are under a certain amount (between 17.5% and 20%), then the number of affordable homes the developer is required to deliver can be reduced. It will therefore be important for our Local Plan to provide certainty for developers at an early stage so that affordable homes can be built into developers costs early on and can be accounted for when land costs are negotiated, for example.

6.54 During the start of the Covid-19 pandemic, the Council was also continuing to see an increase in the number of people requiring our support for temporary/emergency accommodation, with at the peak on the pandemic, 41 households supported for such accommodation (the highest reported number for over a decade). With the lifting of the lockdown restrictions and reopening of the rented sector for housing, this issue has slowly reduced in recent times, but the Council is unsure what the impact of the Covid-19 pandemic will be in the short to medium term given the uncertainty surrounding it and any further lockdown restrictions that may be imposed.

Affordable Housing Needs and Delivery - What are we already doing?

6.55 Our current Local Plan sets out that affordable housing is required at a level of 35% of the number of dwellings on new development sites, above a site size threshold. This would include all major development sites (of 10 dwellings or above) and in designated rural areas (such as the High Weald AONB) on sites of 5 dwellings or more, unless financial viability evidence suggests this is inappropriate.



Old Hop Gardens, Hailsham

6.56 In addition to this, the Council is building its own affordable homes and has set up a housing company to build for market sale but focusing on smaller homes and committed to the full affordable housing percentage. We are also purchasing new Council homes, using returns from council properties sold through Right to Buy.

Affordable Housing Needs and Delivery - What further information is needed?

6.57 As part of updating our housing evidence base we will include an assessment of the affordable housing needs for all households whose needs are not met by the market, including consideration of over-crowding and concealed households. We will also consider housing need specifically in our towns and villages located within the High Weald AONB.

Affordable Housing Needs and Delivery - What do we have to do?

6.58 In order to support the delivery of affordable homes, for these to be provided in the right location and to a high standard to meet local need, we will:

- work closely and collaboratively with internal colleagues within the Council's Housing Team, registered providers of social housing and house builders/ developers to ensure that the right types of affordable homes are delivered in the right location;
- deliver key actions and responses identified within the Council's Housing Action Plan (August, 2020)[21].
- working closely with internal colleagues and other external organisations that drive the delivery of new housing developments across the district; and
- continue to support Neighbourhood Plans that can allow local communities to set out a positive vision for affordable housing in their area (including housing allocations) and set priorities for local infrastructure spending. This would include Community Led Housing schemes as they progress.

Direction of travel policy options

As part of our local plan we will consider the following:

- Providing a policy that requires a minimum threshold for affordable housing provision for all major housing development sites;
- Establishing clear priorities for genuinely affordable family homes for rent or homeownership, including percentages for the types of affordable housing tenures provided on development sites at different scales (i.e. shared ownership, affordable rent, starter homes, self and custom build etc.)
- To set out a clear planning policy for off-site affordable housing contributions and where this may be appropriate, in line with national planning policy guidance.
- To set out a clear planning policy to support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, including allowing some market homes to help facilitate this.

21 Wealden District Council – Housing Action Plan (August, 2020)

Question 4

What do you think?

16 Are there any issues or challenges that we have missed?

17 Do you agree with the proposed policy options?

18 Do you disagree with any of the options?

19 Are there any other policy options we should be considering?

20 Do you have any other comments in relation to how we can plan to deliver affordable housing, including the range, type and tenure?

Chapter 7

Support local businesses, increase jobs and ensure a thriving, diverse and a locally sustainable economy



7.1 This section of the document considers the wider economy of Wealden and the options to support local businesses, increasing the provision of jobs and how we can ensure a thriving, sustainable local economy. Tourism is important to us and we have provided a separate section on tourism and the visitor economy below.

What do we know?

7.2 Wealden has a diverse economy. The previously published Wealden Economy Study[22](2016) identified that our three largest sectors are wholesale and retail trade, health and social care, as well as accommodation and food services. However, it also identified that we have a significant concentration of employees in the district in the construction, manufacturing, professional, scientific and technical industries and also in the education sector.

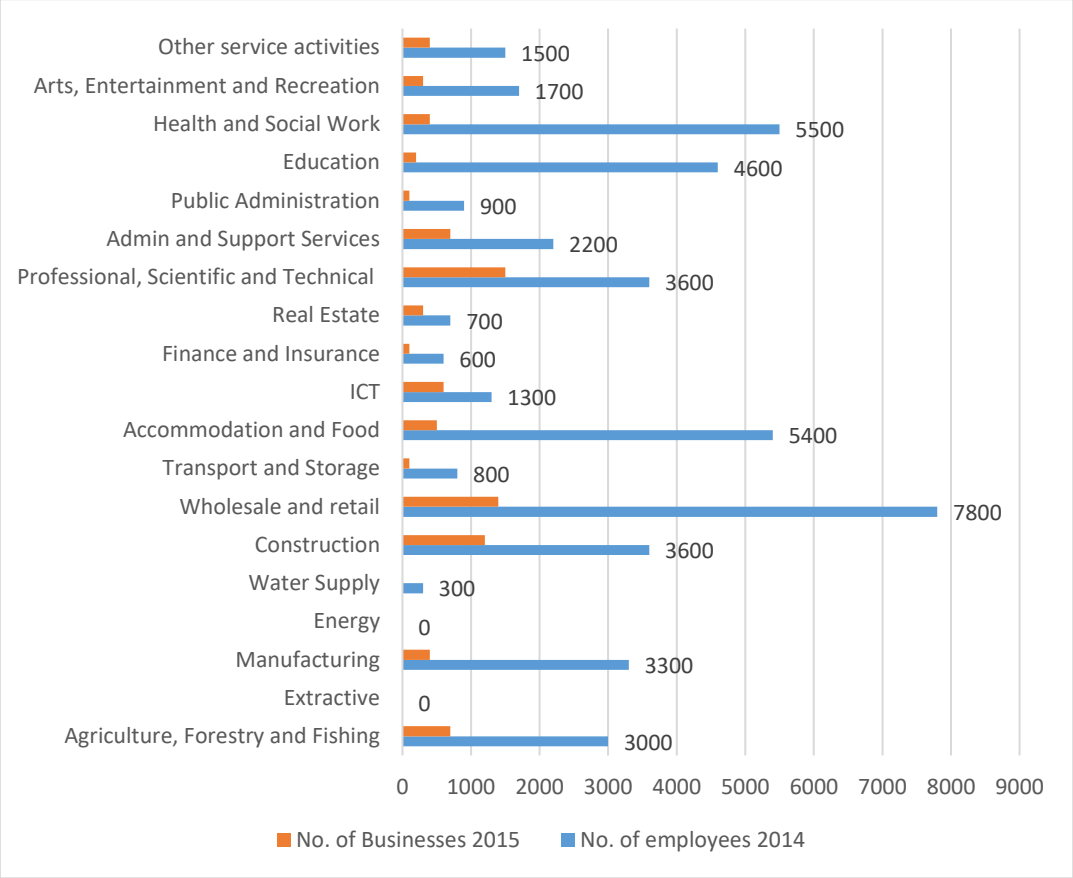


Figure 12 Sectoral Breakdown of Jobs (2014) and Businesses (2015) within Wealden

7.3 Employment in these sectors are mainly located in our more urban areas including Polegate and Willingdon, Hailsham, Uckfield and Crowborough. However, the creative, culture and media industry is characterised by a small number of relatively large businesses located

22 Wealden Economy Study, December 2016

close to Uckfield, Heathfield, Crowborough and Wadhurst and a large number of smaller businesses scattered across the whole district.

7.4 Overall, our labour market performs relatively well with around 74,200 economically active residents (70% economic activity rate)[23]. We also have low unemployment levels (2.5%)[24] with this being amongst the lowest of our neighbouring local authorities as well as also being significantly lower than the south east (at 4.0%) and national (4.4.%) average.

7.5 As part of plan-making we need to consider our Functional Economic Market Area (FEMA). This is the area over which the local economy operates and is defined by taking into account a number of different factors such as travel to work areas, the housing market area, the flow of goods, services and information within the local economy, administrative areas, catchment areas for facilities providing cultural and social well-being and the local transport network. Our 2018 economy study confirmed that our FEMA included a number of neighbouring local authorities including Eastbourne, Tunbridge Wells, Rother, Lewes and Mid Sussex. In 2019, there were around 8,900 businesses in Wealden, representing around a quarter of businesses in the Functional Economic Market Area (FEMA). This compares well with neighbouring authorities as can be seen below.

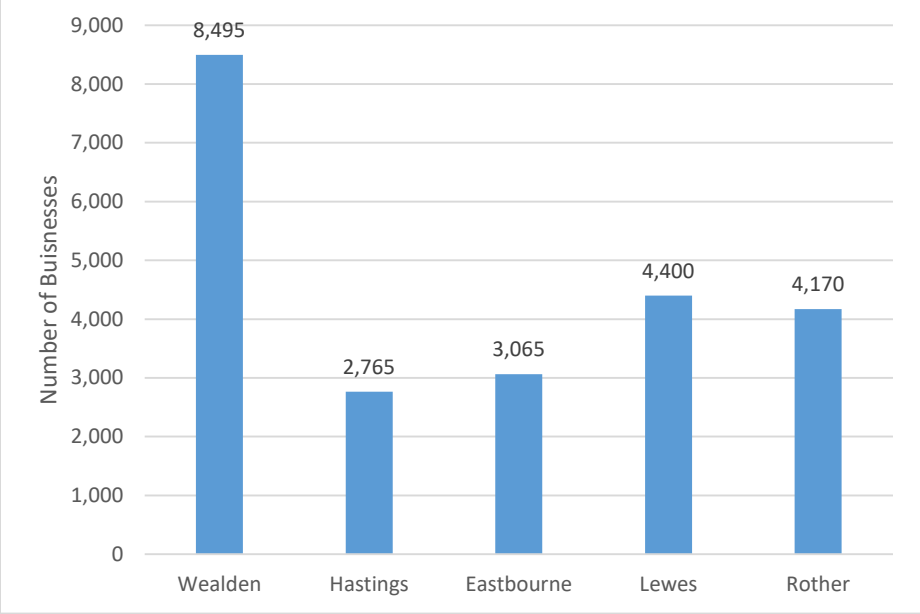
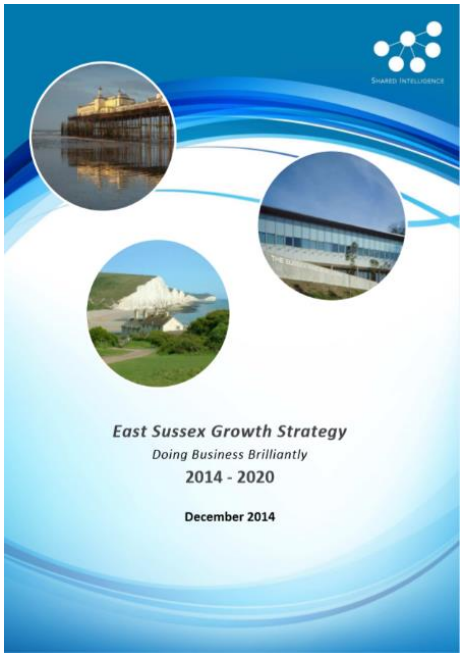


Figure 13 Businesses by District, 2019

7.6 Data indicates[25] that there are around 44,200 jobs in the District. Over half of these jobs (24,800 jobs) are concentrated in urban areas including 7,100 jobs in Crowborough, 5,400 jobs in Uckfield and 4,900 jobs in Hailsham. Around 19,400 jobs are located in rural areas

23 Office for National Statistics, Census 2011
24 Office for National Statistics, Census 2011
25 Office for National Statistics in 2014.

where in recent years there has been an increase in the number of self-employed individuals renting out smaller units on farms and/or running their business from home. In terms of business start-ups and entrepreneurialism we have a good track record, with 15.5% of local residents being self-employed and we previously had a higher than regional and national average business survival rate.



7.7 The East Sussex County Council Growth Strategy[26] confirms that East Sussex and the wider travel-to-work area provide a talented labour pool for businesses to draw upon. There is a higher percentage (32.4%) of residents in East Sussex with NVQ Level 4 or above (i.e. equivalent to three A-levels) compared with the regional average. Wealden itself is home to a relatively large number of highly-skilled individuals, many of whom commute outside of the district for work. At the time of the Census (2011) around 1-in-5 of Wealden's residents aged 16-74 had no formal qualifications. This was however lower than the regional and national average.

7.8 Whilst the above provides some context to understand our economy we are aware that we are currently experiencing uncertain times due to both the Covid-19 pandemic and also EU transition. Team East Sussex has recently produced the East Sussex Economy and Recovery Plan[27] as a direct response to the Covid-19 pandemic. The plan focuses on businesses, skills and employment in a post Covid-19 pandemic landscape and also supports other activities being progressed at the local level, including climate change and health and well-being initiatives. The plan covers issues relating to a number of Wealden's key economic sectors including the visitor economy and outlines what actions and funding streams are being utilised to overcome the issues associated with the Covid-19 pandemic. . As part of this work the South East Local Enterprise Partnership (SELEP) are providing regular updates to assist us to understand the impact of the pandemic on our economy. This work has identified that certain sectors have been severely affected by the pandemic and unemployment has increased. Out of all East Sussex local authorities Wealden has had the largest percentage increase (+208%) in unemployment claims in East Sussex[28], albeit from a relatively low base.

What are our key issues and challenges?

7.9 At a national scale, we are currently uncertain how the European Union (EU) Transition and the Covid-19 pandemic may impact our economy. The wider economy, and particularly

26 East Sussex County Council Growth Strategy 2014-2020, December 2014
27 East Sussex Economy and Recovery Plan, September 2020
28 Economic update, September 2020

the visitor economy, is vulnerable to fluctuations and any economic downturn is likely to impact consumer spending and the viability of certain businesses.

7.10 Whilst our commercial market has historically been reasonably strong, the Covid-19 pandemic has brought about uncertainty in relation to certain physical workplaces. With a large proportion of people working from home, office space is currently the weakest commercial market sector. However, even before the Covid-19 pandemic, we had a relatively small provision of office space and this has been reducing over recent years due, in part, to permitted development rights allowing office to residential conversations without the requirement for planning permission.

Classification Code	Use Class	2014/15	2015/16	2016/17	2017/18	2018/19
B	Mixed B Use Classes	0	-166	0	0	0
B1A	Offices	-77	-940	-830	-1,947	-2,434
B1B	Research and Development	-61	-771	0	0	0
B1C	Light Industry	-106	-1,259	0	0	0

Figure 14 Employment Floor Space Losses to Residential

7.11 As part of plan making, we are required to consider how much new employment land we require over the local plan period (including what type, i.e. office, storage and distribution and general industrial). Similar to housing, adjacent local authorities can ask us whether we are able to deliver any of their employment needs, where they are not able to deliver it. Should we be asked we will need to assess whether we can deliver our employment need and then test whether there are opportunities in our district to deliver additional employment premises.

7.12 Generally speaking, the district does not attract very large scale employers and although we are home to a high proportion of small scale enterprises, these generally employ less than 10 members of staff. The East Sussex County Council Growth Strategy confirms that we should aim to capitalise on opportunities for growth in current and emerging sectors and support business start-ups and business growth. If we are to raise productivity within Wealden, we will need to support our existing growing companies and build a stronger base of firms and employment particularly where they have the potential to grow. This includes sectors such as advanced manufacturing, the creative and cultural sector, business and professional services, health and social care, as well as land based industries.

7.13 On average, workplace wages in the district are low compared to residents who access employment elsewhere, which is an issue for those residents wishing to access market housing. It is known that wages do vary significantly across the County but on average residents in East Sussex earn less than in other parts of the South East and this is true for Wealden also.

This partly reflects the high concentration of employment in sectors that are generally lower paid and includes hospitality, leisure and health and social care, some of which have been greatly impacted by the Covid-19 pandemic. To achieve changes to address this issue, the East Sussex County Council Growth Strategy has stated we need to achieve better alignment of skills provision to meet local employer needs and to increase the number of people in the workforce with high levels skills.

7.14 Although the planning system cannot resolve this issue entirely, support to higher skilled businesses through the planning system may assist in this objective.

7.15 Although Wealden is home to a relatively large number of highly skilled individuals, over 30,000 people out commute for work compared to only 14,900 who travel to our district to access work. Just over 33,000 people both live and work in the district which is nearly as many employees which out-commute. Overall, we have a job density of approximately 0.72 which means there are 72 jobs for every 100 residents of working age. In developing our plans it will be important to consider opportunities provided by our large and skilled workforce, as well as opportunities provided by a growing population. Providing additional opportunities for work could encourage more people to set up businesses, subject to the right premises being made available. We also need to ensure that infrastructure is provided to support growth. This includes superfast broadband and mobile phone coverage alongside improvements to the road network. The provision of suitable infrastructure will need to be considered alongside the future provision of employment space.

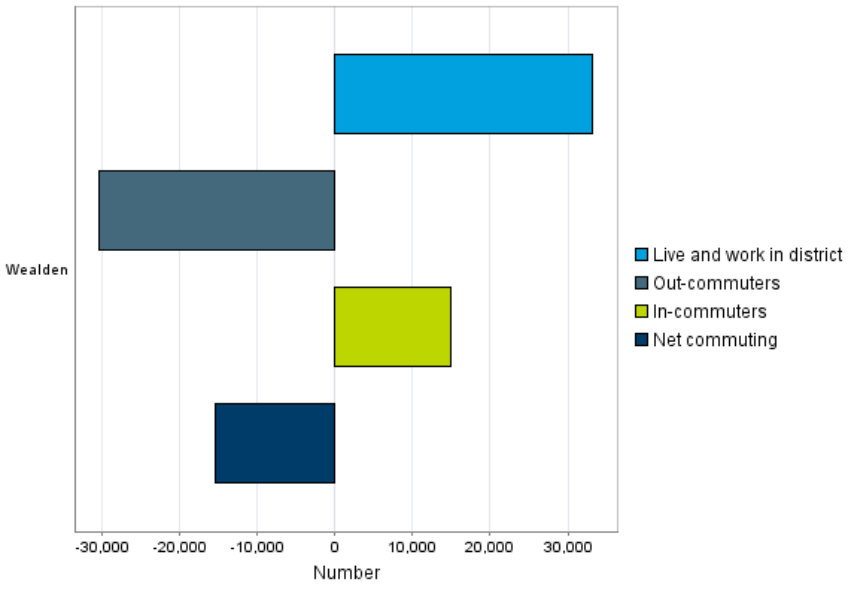


Figure 15



Hale Farm Glamping & Luxury Barn Conversion

7.16 Agriculture plays an important role within Wealden's economy and land/building requirements for such businesses will need to be considered within the Local Plan. Specifically, there are land use implications for farms seeking to diversify by converting disused and underutilised farm buildings (such as barns) to other employment uses (such as offices, storage or tourist facilities). Such issues are integral to the running of rural businesses and particularly farmsteads so will need to be considered as part of the local plan process.

7.17 A key area of focus for the new Local Plan will be the consideration as to how we can ensure that both new and existing businesses can continue to operate effectively. We will need to consider ways that we can support the expansion/intensification of existing businesses, including those located on industrial estates and small to medium sized enterprises. We will also need to support adapting empty retail sites and spaces in ways that improve local facilities.

7.18 There is evidence that East Sussex has suffered from a shortage of quality business premises due to a lack of speculative development in the past. It is also known that a number of businesses within Wealden have required and/or will require expanded business premises. The main growth corridor in East Sussex Growth Strategy for Wealden is the A22/A26/A27 Eastbourne-Polegate-Hailsham-Uckfield-Crowborough corridor and the Council will aim to provide a pipeline of business premises in these locations, or to have flexible policies that allow for the expansion or intensification of existing business estates.

7.19 We will also need to consider how we can support the development of flexible office workspaces in the right locations and ensuring that existing small scale employment floorspace (incubation spaces) suitable for start-ups will be protected from redevelopment. Land values are generally the key challenge here, given that housing values generally exceed employment uses of all types. It is recognised that without intervention, small scale employment may be lost to redevelopment and it is these spaces which are vital in the growth of new businesses. In addition to protecting these workspaces, it is likely that we may need to provide new flexible workspaces, especially in relation to how we can support smaller businesses looking to have smaller/flexible office space, particularly in a post Covid-19 landscape.

7.20 The Government has recently introduced a number of major changes to the planning system. This includes changes to the planning use class order and permitted development

rights[29]. These reforms are aimed at allowing businesses greater freedom to change to a broader range of uses. This has included both office and light industrial floorspace. For Wealden, it is known that offices have been in decline for a number of years and we therefore anticipate further losses to alternative development as a result of this change, coupled with the Covid-19 pandemic. In addition, it may mean that light industrial premises could feature in residential areas/town centres, or that offices in out of town locations could become retail premises in the future. The new Local Plan will need to consider these issues moving forward.

What are we already doing?

7.21 In terms of the Covid-19 pandemic, the Council has been supporting businesses through the initial business grants scheme and the later local authority discretionary business grants fund, where the Council has distributed over £40 million to eligible businesses. These funds have largely been aimed at small to medium size businesses that have been impacted by the Covid-19 pandemic and the Council has worked as quickly and efficiently as it can to distribute such funds to the businesses who were eligible.

7.22 We are also currently working with partners at Team East Sussex to deliver against the objectives contained within the East Sussex Economy and Recovery Plan. This includes taking advantage of any shift towards home and local working, to reduce out commuting from the County and to encourage businesses of all kinds to relocate in East Sussex. It will also involve supporting the tourism sector where possible; streamlining the processes for planning applications for change of use, particularly in town centres (to support the adaptation and use of existing buildings) and to support investment in fast broadband for businesses and homes throughout Wealden.

7.23 Our existing planning policies have sought to protect specific town business areas by only allowing business use classes within certain areas of a town. The Council has also allowed for the expansion, redevelopment and intensification within existing business sites located outside of development boundaries in the past, providing that criteria on its impact (i.e. landscape, amenity and traffic generation) are acceptable in those locations. These planning policies have been successful in protecting and supporting existing business sites within the towns and villages of the district, but will need to be updated to be in line with current national planning policy.



Vacgen plant, Swallow Industrial Estate, Hailsham

7.24 It is important to note that before the 1st September 2020, the planning system had some control in determining the balance of

29 Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

different town centre uses. This has in the past allowed us to consider the acceptability of different uses in the context of the town centre and we have used existing policy to ensure that the right mix of uses are delivered. With the introduction of Use Class E[30], businesses can now change without planning permission to different uses, for example from a shop to a café, bank, office or light industrial use. We are now implementing this legislation to assist our town centres to adapt to change.

7.25 Our Adopted Core Strategy Local Plan 2013 provided a target to deliver 128,695 square metres of additional employment floor space between 2006 and 2027[31] with provision being made for 40,000 square metres of (B1/B2 and B8) in the Local Plan.

7.26 Since adoption, we have delivered just over 30,000 square metres (net) of employment floorspace until 31 March 2019. As of 1 April 2019, the Council has commitments for in excess of a further 34,000 square metres (net). This demonstrates that Wealden is an attractive place to set up or expand a business and that the Council is delivering against its adopted target currently.

What further work is needed?

7.27 We published a Wealden Economy Study Update in March 2018 (the first study being published in 2016), however, we will need to update our economy evidence base as part of the local plan process, in order to establish the employment floorspace requirements for the new Local Plan. As part of this work we will also need to understand our economic development needs to ensure that our plan making is based on up-to-date information about our economy. This work will involve the following:

- Defining the Council's Functional Economic Market Area (FEMA) and Wealden's wider spatial relationships with neighbouring local authorities;
- Identify the economic context for Wealden in relation to existing economic development stock and recent anticipated supply and loss trends;
- Identify the current commercial property market demands and trends for different segments of the economy and its spatial distribution across Wealden;
- We will need to consider how we can use land more effectively including providing for the needs of modern businesses, whilst maintaining the viability, diversity, representation and mix of both micro and large businesses;
- To provide evidence of market changes (including those as a result of Covid-19 pandemic) and opportunities for economic growth, diversification and innovation including specialist or new sectors, and flexible workspaces;
- To outline impact of the Covid-19 pandemic particularly on the commercial property market in terms of the demand/supply of premises including buying, selling and leasing of commercial property, the labour market and any new trends in terms of economic inactivity rates/unemployment;

30 The Town and Country Planning (Use Classes) (Amendment) Regulations 2020
31 Wealden Core Strategy Local Plan 2013, Policy WCS1

- To outline the impacts of Covid-19 pandemic on specific economic development types (i.e. offices or warehouses) in terms of demand and also in terms of their specific locational or floorspace requirements that may well be different;
- To determine the minimum amount of economic floorspace/land required for Wealden over its Local Plan period, taking into account national planning policy guidance on determining economic development needs;
- To determine the potential size, type, tenure and potential locations (broad locations) of economic development needed for established and prospective business uses in Wealden;
- The implications of the new Planning White Paper and what this might mean for how we plan for economic development in the future; and
- The implications of greater flexibility in changes of use introduced by the Government in September 2020.

What do we have to do?

7.28 In order to support the economy within Wealden, we will:

- Work closely and collaboratively with our Town/Parish Council's, East Sussex County Council, chambers of commerce[32], local businesses, residents and others with an interest in Wealden's economy to bring about positive change;
- Work closely and collaboratively with neighbouring local authorities to ensure that the employment needs of such areas are known and can be planned for at a strategic level;
- Continue to support Neighbourhood Plans that can allow local communities to set out a positive vision for their towns and villages, particularly for employment generating uses, and set priorities for local infrastructure spending;
- To identify and apply for funding to drive inward investment into our town and villages and to consider what is required for creating an environment where businesses can thrive, such as public realm improvements, infrastructure provision and transport improvements.

Direction of travel policy options

We are considering the following policy directions:

- To establish how much economic development floorspace will be required in Wealden over the plan period, including any unmet needs from neighbouring authorities and provide a strategy for bringing forward sufficient employment land to meet those agreed needs;
- Provide a spatial strategy for the distribution of new economic development that takes into account the known constraints of the district to ensure that sustainable development comes forward;

32 Team East Sussex Team East Sussex is the local federated board for the South East Local Enterprise Partnership (LEP)

- Provide planning policies that ensure new employment development, whether large or small, are of a good design, have a suitable access and are supported by the right infrastructure;
- Provide planning policies that seek to protect existing employment land from redevelopment in both urban and rural settings where this is needed;
- Provide planning policies that set clear criteria is established for the expansion and/or intensification of existing employment sites where planning permission is required;
- Provide further guidance on the protection of residential amenity where employment uses are intensified/expanded in residential areas;
- The new Local Plan will direct our largest scale employment generating activities in Wealden to the most sustainable locations;
- Provide planning policies that support and are flexible with regards to small-to-medium sized enterprises and help facilitate the growth of such businesses in the future. This could consider actively considering options to make land available for such business uses;
- Provide further guidance on the types of offices that could be encouraged in the economic climate, specifically the types of shared, flexible and managed workspaces suitable for start-ups and very small businesses;
- Provide further guidance for rural businesses that includes issues surrounding the diversification of existing farming enterprises, the conversion of rural buildings for employment use and the expansion/intensification of outdoor recreational businesses; and
- To ensure that planning policies create an environment which enables the cultural and creative economy to expand.

Question 5

What do you think?

21 Are there any issues or challenges that we have missed?
22 Do you agree with the proposed policy options?
23 Do you disagree with any of the options?
24 Are there any other options we should be considering?
25 Do you have any other comments in relation to how we can plan for employment within both the urban and rural areas of our district?

Chapter 8

Support and regenerate our town and local centres by attracting the right investment and creating vibrant places that provide for our community's needs



What do we know already?

8.1 Wealden is characterised by attractive market towns and villages. Our main shopping centres are located in the larger market towns of Uckfield, Hailsham, Crowborough and Heathfield. There are three smaller centres in Wadhurst, Forest Row and Polegate and a number of local centres and individual shops across the district serving local people's 'everyday' needs.

8.2 In 2016 we undertook a retail and town centre study[33]. This will need to be updated to support our new plan but the study nonetheless provides us with some context for the areas that we may wish to focus upon to help shape and improve our town centres now and in the future.

8.3 Vacancy rates are a key indicator to understand the health of a town or local centre. High vacancy levels in a centre, or a concentration of vacancies in certain areas or streets, could point to weak retailer demand in those areas or that the vacant units are not 'fit for purpose' or both.

8.4 Previous surveys in 2016 identified that our towns and local centres were generally healthy with no significant concentration of vacant units. However, since 2016 our town centres have faced unforeseen challenges including the recent impact of Covid-19 pandemic, leading to the closure of some shops and businesses.

8.5 We are unable to predict at this time the short or long term impacts of the Covid-19 pandemic and what this may mean for the future of our town centres and our communities shopping habits. However, we will liaise with partners and undertake research to understand the impacts so that we can best support businesses and the health of our town centres

8.6 Generally speaking our larger centres provide good convenience shopping. Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery. Historically, the District's main food and convenience stores achieve a relatively strong retention level of shopping trips and expenditure, although Hailsham's retention level is much lower due to the draw of food stores (Asda, Tesco Extra and Sainsbury's) in Eastbourne. This means that a large proportion of our communities choose to shop locally for these items rather than travelling outside the district.

33 Carter Jonas, Town Centre Study 2016, Market Demand assessed in 2016

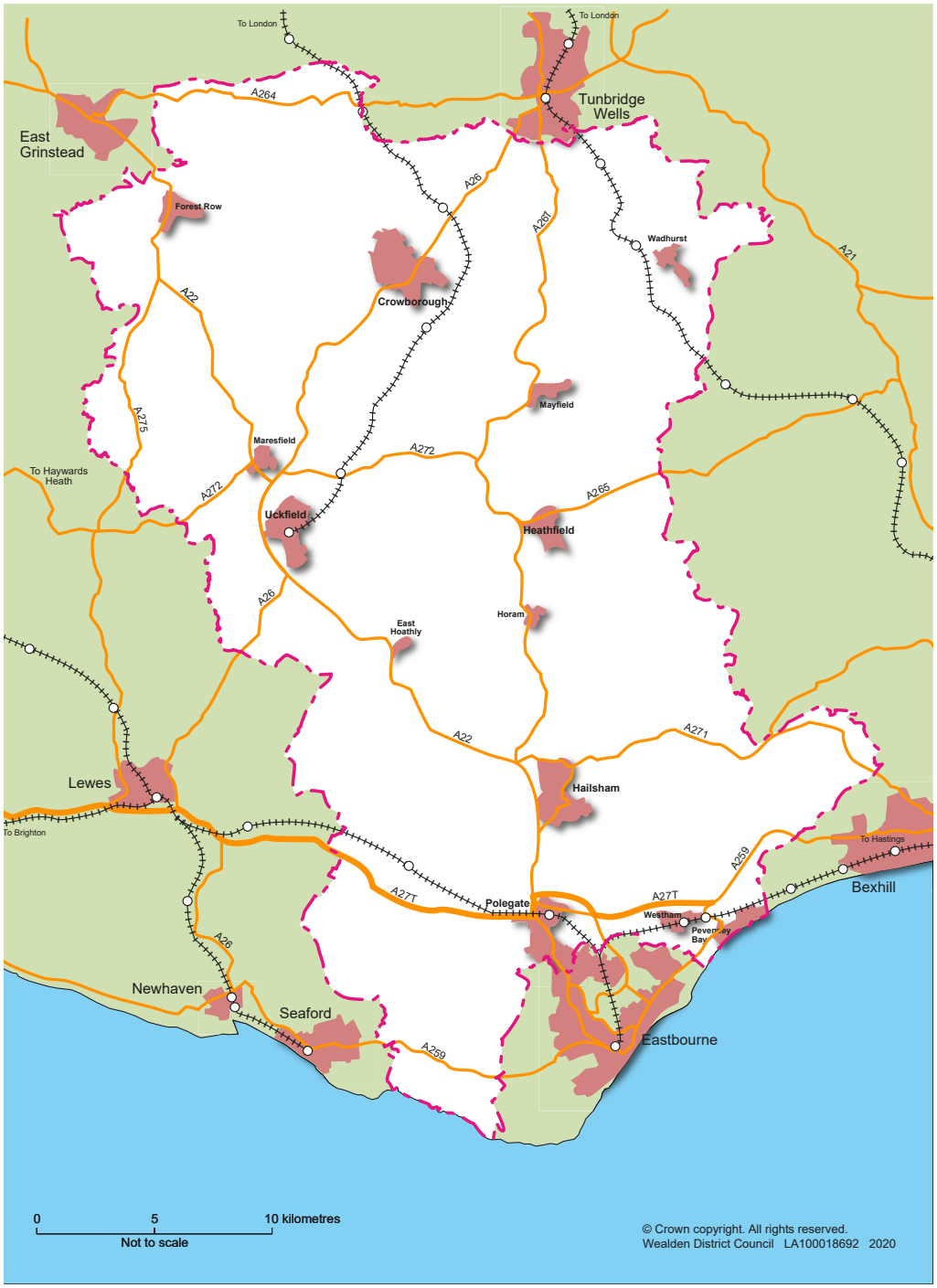


Figure 16 District and local centres and location of other town centres outside the district

8.7 Overall, the district's town and local centres in 2016 were achieving a low (20%) retention rate for comparison good purchases. Comparison retailing is the provision of items not obtained on a frequent basis including clothing, footwear, household and recreational goods. In relation to clothing and footwear, the district has historically had a limited market share reflecting the limited scale, quality and choice of shops compared with competing centres such as Tunbridge Wells, Eastbourne, Brighton, Lewes, Haywards Heath, Crawley and East Grinstead. The district also achieved a limited market share for furniture, flooring and household textiles with leakage to Tunbridge Wells and Eastbourne. However, Wealden had a higher market share in the DIY and gardening category, although some leakage occurs to Eastbourne and Tunbridge Wells.



Hailsham High Street

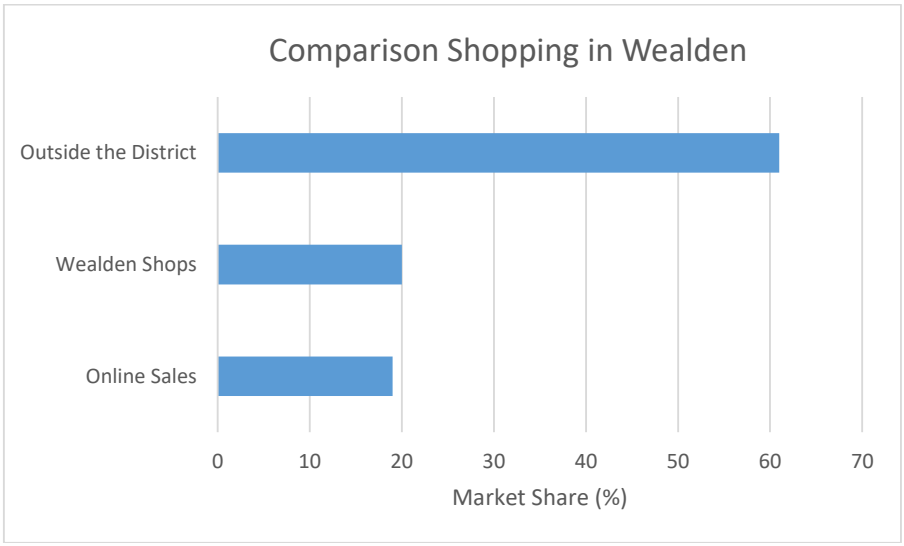


Figure 17 Retail Expenditure - "Leakage"

8.8 The comparison offer in our market towns is generally dominated by independent retailers, however we do have some multiple retailer presence. There has also been some demand from multiple retailers to locate to our main towns . These businesses could help to improve the retail offer and make a positive contribution to the vitality of a centre by attracting more shoppers to our towns.

8.9 The market share for online shopping for comparison goods in the district was, in 2016, higher than the national average for specific retail products (recording media, audio-visual,

books and stationary, toys, games, bikes and pet products, domestic electrical goods and clothing and footwear) but lower for others (DIY, medical goods, personal care, furniture and carpets). Online shopping draws business and expenditure away from our town centres.

8.10 The level of service provision which includes any other town centre facilities other than traditional shops such as banks, opticians, dry cleaners, takeaways, pubs, cafes and restaurants, cinemas, health facilities, tattoo parlours amongst many others is higher than the national average but this is not unusual to find in market towns.



Uckfield High Street

8.11 Our market towns, as well as our smaller centres including Forest Row and Wadhurst, all run farmers and / or street markets. Street markets provide economic value and are recognised in national policy for the role they can play to encourage vibrant and active town centres. Successful markets embrace change in consumerism and work to attract residents to create a vibrant and successful market. This can in turn attract visitors from elsewhere to increase the value of the market as well as encourage additional use of our town centres.

8.12 In the past, our research has identified a need for a modest amount of new retail floorspace, which has largely been driven by the District's rising population and the projected future growth over the plan period. We have previously sought to accommodate this additional retail floorspace mainly within Uckfield and Hailsham.

What are the issues and challenges?

8.13 At a national scale, we are currently uncertain how the EU Transition and the Covid-19 pandemic may impact the economy. The retail sector is vulnerable to fluctuations in the economy and an economic downturn is likely to impact consumer spending and the viability of existing retail businesses. It is unclear at this stage what this means for the future need for physical retail and leisure floorspace within our town centres.

8.14 From previous consultations we are aware that higher order town centres located outside of the district, such as Tunbridge Wells, Eastbourne and Brighton, exert a strong influence on shopping patterns and expenditure flows within the district, where a significant proportion of our residents shop outside the district to meet their overall shopping needs. The challenge is how to maintain and strengthen the market shares of our town centres and smaller centres in the face of the growing competition from larger neighbouring centres.

8.15 Putting aside the uncertainty associated with Brexit and the Covid-19 pandemic, at a national level, it is likely that major retailers will continue to seek to locate in less risky larger regional or sub-regional centres with strong catchment areas rather than market towns. This

reduces the ability to improve the draw of our town centres and minimise the leakage that occurs to other higher order towns. We need to consider alternative ways therefore to achieve this.

8.16 The growth in internet shopping has significantly impacted the vitality and viability of our High Streets and sales, where internet shopping provides consumers with convenient and cheaper alternatives to that provided by traditional shops. The way people spend their leisure time is also changing. For example, instead of going out people stream movies, order takeaways and face-to-face interactions are becoming less due to social media. These are all challenges currently experienced in the retail sector, which are in turn challenging the role and function of the High Street including our night time economy. Whilst already an issue, this trend has accelerated this year due to social distancing restrictions as a result of the Covid-19 pandemic.

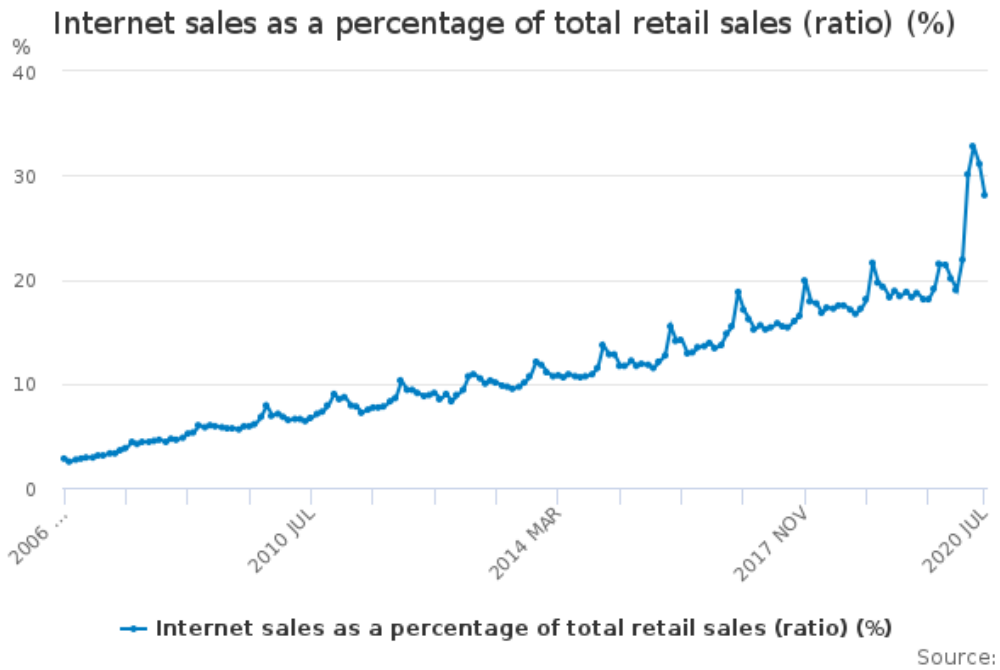


Figure 18 ONS Data - Published 21st August 2020

8.17 Without intervention, these challenges could result in higher vacancy rates, decreased footfall, a weakened retail offer and a worsening of the town centre environment. This in turn could see our High Streets shrinking and may result in a refocused retail core.

8.18 Multiple retailers often have specific requirements for premises in terms of scale, format and location. There is currently a lack of modern larger format units within our town centres. Many of the existing units are simply too small and/or the wrong shape. The lack of appropriate units within our centres may push retailers to seek out of centre locations instead of sites in the town centre. This would result in drawing shoppers away from our towns, which would work against our aim to direct investment into our existing town centres.



Historic shopfront in Crowborough

8.19 There are areas for improvement in the physical environment of our town centres. Whilst there are some attractive and well-kept historic buildings in our town centres, there are also examples of poor street frontages, badly kept facades, poor quality buildings and unattractive window displays. In addition, some of our shopping centres look dated and would benefit from investment.

8.20 The public realm could also be improved with the provision of street furniture and decoration. Narrow pavements could be widened and wayfinding signage could be provided or made clearer for users. In some instances, the physical layout of the centre itself could be redesigned to create stronger linkages between different town centre areas.

8.21 The markets that take place in our town and local centres vary in popularity and size. The locations where markets take place are generally uncovered, outside and open to the elements. Some of our markets are also held away from the High Street and would benefit from relocating in a more central location to strengthen viability and vitality. However, without the redevelopment or reconfiguration of the town centre this may be difficult to achieve.



Hailsham Street Market

8.22 The Government has recently introduced a number of major changes to the planning system. This includes changes to the planning use class order and permitted development rights[34]. These reforms are aimed at allowing businesses greater freedom to change to a broader range of uses that you might find on a modern high street. It will mean that town centres will be able to adapt more quickly to changing circumstances. This may prevent an increase in vacancy levels in our town centres. However, some users may find it harder to compete for space as alternative uses compete for the same space. The changes will also allow up to two additional storeys to be built on existing commercial and residential buildings without the need to apply for planning permission in certain circumstances, which may see additional new homes being delivered in our centres.

34 Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 & The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2020

8.23 Other temporary measures have also been bought forward that make it simpler and quicker for cafes, pubs and restaurants to get permission for outdoor seating[35]. Changes to the rules on temporary uses and additional support for markets to be held in our centres have also been passed.

8.24 The Government's White Paper consultation which seeks to reform the Planning System in England[36] indicates that town centres could be included within renewal areas, where a statutory presumption in favour of development being granted for suitable uses would apply. If taken forward these reforms could have a big impact on how we plan for town centres within our emerging Local Plan.

8.25 It is too soon to know yet what impact these changes will have on Wealden's town centres. We do not yet know whether this will lead to a widespread loss of shops or what uses will likely dominate in the future. However, we do know that we have a crucial role and opportunity to strengthen our town centres, enhance their character and ensure that they support our communities. We therefore need to provide planning policies that will ensure that our town and local centres can adapt to change, will result in healthy towns and provide opportunities for investment to improve the town centre environment and offer.

What are we already doing?

8.26 Our existing policies have protected the retail function of our town centres by preventing large concentrations of non-retail uses. We have supported office and residential uses on upper floors that support the town centre by drawing in workers and residents during the day and in the evening. We have prevented residential uses on the ground floor because this can create dead frontages that have a negative impact on the vitality of the town centre. These policies have been successful in protecting and preserving the historic role our town centres have had in serving our communities.

8.27 National planning policy requires us to provide enough retail floorspace to meet our needs. Our Adopted Core Strategy Local Plan 2013 provided a target to deliver 17,000 sqm of additional retail floor space by 2027[37]. Since 2013, we have only delivered a modest increase in retail floor space of 2,334 sqm[38]. New retail floorspace has seen the provision of a new Lidl supermarket at Dittons Road in Polegate and an extension to the Hillier Garden Centre, also near Polegate.

8.28 It is important to note that before the 1st September 2020 the planning system had some control in determining the balance of different town centre uses. This has in the past allowed us to consider the acceptability of different uses in the context of the town centre and we have used existing policy to ensure that the right mix of uses are delivered. With the introduction of Use Class E, businesses can now change without planning permission to

35 Business and Planning Act 2020
36 Planning White Paper August 2020
37 Wealden Core Strategy Local Plan 2013, Policy WCS1
38 See Wealden's Authority Monitoring Reports 2013- 2019

different uses, for example from a shop to a café, bank, office or light industrial use. We are now implementing this legislation to assist our town centres to adapt to change.



Hailsham Aspires - Let's Shape The Heart Of Our Town

8.29 A key commitment set out in our Corporate Plan[39] is to lead on key local regeneration projects to create busier, more diverse high streets and local centres. To compliment housing growth, Hailsham has so far been our main focus where in 2017 we purchased Vicarage Fields Shopping Centre in recognition that the site along with other surrounding land and buildings provide an opportunity to regenerate the town centre through the delivery of a mixed retail, residential, leisure and office space redevelopment. We are currently working in partnership

39 Wealden District Council, Corporate Plan 2019-2023

with landowners and businesses to progress this and we believe that our investment will help boost the town's viability and vitality over the long term in line with our strategic objectives.

8.30 Since 2016 we have also been working in partnership with East Sussex County Council and the Town Councils to make significant traffic, street and pavement improvements in Hailsham and Uckfield. The works include improvements to street lighting, pavement surfaces and junctions to improve pedestrian and traffic flows as well as making the centres look more attractive. Work is also currently taking place in Uckfield to improve the layout of the bus station.

8.31 Recently, we have been working to support local businesses, retailers and our community through the Covid-19 pandemic in what has been a difficult time for our town and village centre businesses. We have paid out over £38m pounds in business grants to provide the necessary support during this period and we are developing a Re-Start and Recovery Plan that has a strong focus on supporting local businesses and assisting the local economy to recover.

What further work is needed?

8.32 We will commission a Retail and Leisure Needs Assessment to provide a robust evidence base that will inform and justify our future policy direction for town centres. As part of this work we will consider the following:

- The current health of our town centres and the key issues they face;
- How different centre's roles, function and hierarchy might evolve over the plan period in response to market forces and how this might impact on the vitality of our town centres;
- The amount and mix of uses in each centre (including levels of vacancy) and how this has changed;
- The future population and retail expenditure projections over the plan period;
- We will need to consider whether we require more or less retail floorspace and the ability of our town centres to accommodate need. Where we require more we will need to consider where and how much. Should we require less we will need to consider a more flexible approach to town centre uses;
- We need to consider how we can use land more effectively including providing for the needs of modern retailers, whilst maintaining the viability, diversity, representation and mix of independent businesses;
- We will need to define the extent of our town centres. The existing town centre boundaries and will make recommendations for changes if appropriate;
- What level a local impact test threshold should be set at;
- We need to understand how we can encourage 'niche' independent retailers to strengthen the retail provision in our town centres and increase our market share in comparison shopping and how planning policy might support this;
- We need to consider whether there are opportunities to better provide for and encourage local markets;

- We need to consider how we can strengthen and promote the evening economy in our town and local centres;
- Investigate whether we can restrict certain types of uses such as the number of takeaways where these would conflict with health and well-being objectives, such as reducing obesity;
- Investigate whether there is scope for more community uses in town centres without impacting retail offer needs;
- The implications of the Planning White Paper and what this might mean for how we plan for town centres in the future.

What do we have to do?

In order to support our town centres we will:

- Work closely and collaboratively with our town councils, East Sussex County Council, chambers of commerce, Team East Sussex, local businesses, residents and others to bring positive change to our town centres;
- Identify and apply for funding to take forward a positive strategy for attracting investment into our towns and to deliver public realm improvements, and
- Continue to support Neighbourhood Plans that can allow local communities to set out a positive vision for their towns and set priorities for local infrastructure spending.

Directions of travel policy options

As part of our Local Plan we will:

- Setting visions and objectives for each of our larger town centres and identifying specific improvements that could be brought forward through future development proposals;
- Establish a hierarchy of town and local centres in the District taking into account each centre's size and function;
- Define the extent of our town centres and primary shopping areas;
- Direct new major retail and leisure development into our larger town centres;
- Require out of centre retail development proposals to prove no adverse impact on our existing centres by setting a locally specific threshold for retail impact assessments;
- Provide planning policies that support and encourage the regeneration and development of appropriate town centre sites, encouraging a suitable mix of uses;
- Provide planning policies that support the delivery of a range of shop unit sizes to meet the needs of retailers and businesses that wish to locate or increase their offer in our town centres;
- Provide planning policies that support and encourage a more vibrant daytime and evening economy within our town centres including diversity of uses such as pop-up shops, shared spaces etc.;

- Provide policies to protect community uses, local shops and services in our local centres / villages;
- Provide planning policies that seek to retain, enhance and re-introduce or create new markets; and
- Provide planning policies that will preserve or enhance the character and appearance of our town and local centres.

Question 6

What do you think?

26 Are there any issues or challenges that we have missed?
27 Do you agree with the proposed policy options?
28 Do you disagree with any of the options?
29 Are there any other policy options we should be considering?
30 Do you have any other comments in relation to how we can plan for retail in our town and local centres?

Chapter 9

Improve our existing tourism offer and increase visitor spend





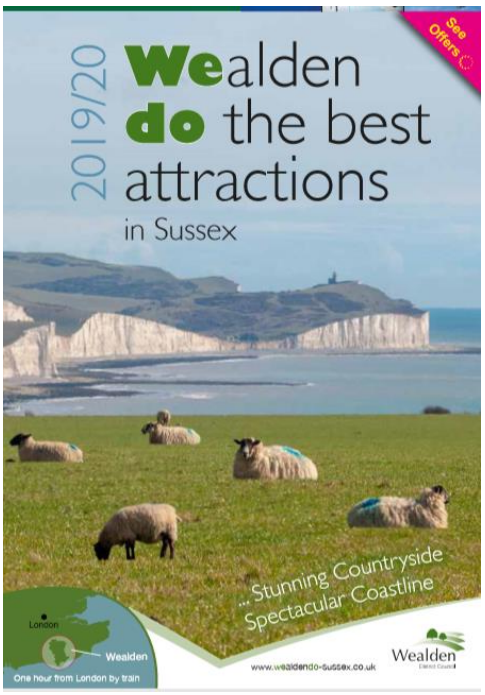
Sheffield Park

What do we already know?

9.1 Our core appeal to both residents and visitors is our beautiful, varied and unspoilt landscapes and views, with undeveloped coastal cliffs, beaches and countryside that varies from ancient woodland, forests and heathland to a patchwork of medieval fields, parklands and open rolling downs.

9.2 Tourism and the visitor economy makes a significant contribution to the overall cultural environment of the district. The unique nature of the district's landscapes, its historic villages, its opportunities for leisure and recreation and its market towns, provides an overwhelming opportunity in this area. It is the natural beauty of the area, its food and drink production, as well as its small and welcoming businesses situated close to larger towns, that are its greatest cultural assets. The district offers both our residents and visitors relaxation, space and peace – an opportunity to get away from the stress of daily life - and a public rights of way network with areas of open access land that enables visitors to partake in a range of free outdoor activities including walking and cycling.

9.3 There are a number of tourism attractions dispersed across the district capitalising on our unique and treasured environment. The existing attributes of the district make it a destination for high quality tourism and leisure activities, making the most of the unique and iconic landscapes and countryside and there is a focus on high end countryside leisure pursuits, food production and viticulture.



9.4 Tourism is an important economic sector for Wealden providing around 6,900 jobs and representing around 16% of our total employment. Although the visitor economy sector is relatively spread across the district, there is a concentration around Uckfield, Crowborough, Forest Row, Polegate and Willingdon, which reflects the attraction of our rural and protected landscapes of the coast, South Downs and High Weald, including Ashdown Forest. In 2018, it was estimated that around 0.54 million overnight tourisms trips[40] were made to Wealden and around 5.4 million tourism day trips were made. This generated an expenditure of around £310 million from both overnight and day visitors, directly benefiting local businesses including hotels, restaurants, cafes, shops and attractions.

9.5 Our most visited attraction is the Seven Sisters chalk cliff coastline at Birling Gap, which attracts around 700,000 visitors each year. In addition, the South Downs National Park has recently received International Dark Sky Reserve status, with Birling Gap being designated a Dark Sky Discovery Site and this is expected to attract an increasing number of visitors to the area, although even without the Dark Sky status the South Downs National Park is a top attraction in the south of the district.



Birling Gap, Seven Sisters Country Park

9.6 Overlooking Cuckmere Valley, is Rathfinny's Wine Estate near Alfriston, which attracted more than 30,000 visitors in the last year and is expected to attract much higher numbers after it starts to promote its Sussex Sparkling wine internationally. There is strong potential to utilise

40 The Economic Impact of Tourism on Wealden District 2018, Tourism South East

the growing wine sector across the district to develop high profile activities and packages that could attract both international visitors and local audiences to engage with top quality English wine producers and smaller vineyards.





Pooh Corner Gift Shop, Hartfield & Pooh Bridge, Ashdown Forest

9.7 The district offers a range of attractions and activities including but not limited to historic properties and gardens; literary and cultural connections; Golf; rock climbing; garden centres; outdoor activities and heritage railways (the Bluebell Railway & Lavender Line). There is also a subtle cultural offer within the district based around the homes of literary and artistic personalities including Roland Penrose and Lee Miller who Picasso visited at Farley Farm house; Sir Arthur Conan Doyle at Crowborough and Groombridge Place and AA Milne and Winnie the Pooh at Pooh Bridge in Ashdown Forest. In addition, there is a high quality food and drink offer within the district, with 120 pubs situated in town, village and rural locations, many of which offer B&B accommodation. There are also 40 farm shops selling local produce including Wealden produced wine, cider, cheese and meat.

9.8 Festivals and events also form part of the cultural offer in Wealden, with around 50 local villages and communities organising local events and festivals with some such as the Herstmonceux Medieval Festival on August Bank Holiday attracting a wider regional audience.

9.9 Our visitor accommodation is primarily self-catering, with a strong camping offer. In total there are more than 250 businesses offering overnight accommodation for visitors of which two thirds are self-catering units (46%) or camping, caravanning or glamping sites (20%). This sector offers some interesting and unusual accommodation including wild camping, glamping, shepherds huts, tree houses and large group camping.

9.10 By comparison, the serviced sector is considerably smaller, both in volume and the size of properties. There are more than 50 B&B's and relatively few hotels but these are mainly of high quality for example, Ashdown Park Hotel, Buxted Park, Horsted Place, East Sussex National and Deans Place.

What are the issues and challenges?

9.11 The key challenge we face is that of protecting our tourist attractions and visitor accommodation, including the context of our tourism offer (i.e. the landscape, historic

environment and existing offer), whilst providing new opportunities to develop such businesses within the district. In order to grow the tourism and cultural offer within the district, appropriate accommodation is required to help increase overnight stays and increase the use of our tourism offer. Tourism has the potential to help improve the District's town and village centres and provide associated benefits to the District's residents. However, the District's tourism offer is based upon our rural nature and unspoilt environment and therefore it is necessary to ensure that this unique selling point is retained.

9.12 We face the challenge of reaching a balance between encouraging and supporting new tourism and cultural attractions/businesses to the district with things such as protecting the landscape and in the provision of infrastructure. A particular issue we face is that high numbers of visitors can put pressure on some locations or 'hot-spots', for example, by impacting on tranquillity, increasing traffic and parking congestion, or causing physical erosion. We want to maximise the benefits of cultural and tourism attractions whilst minimising any negative impacts such as these. This is particularly relevant to the district given that some of our existing tourist attractions and cultural offerings are within rural areas as well as the High Weald AONB and the South Downs National Park.

9.13 The fact that our accommodation is heavily skewed towards the self-catering and camping sector, with a much smaller proportion of B&Bs and hotels, presents the challenge of attracting higher spending and longer staying visitors through improvements to the accommodation offer. Research we have undertaken has shown that despite the improved performance of the tourism sector, there are deficiencies within the tourism product we offer, specifically the limited provision of quality serviced accommodation and limited product awareness. These would need to be addressed to support the development of our culture and tourism offer, for example in wine tourism which is a sector identified as having significant growth potential. One of the motivations of visitors is the desire to take part in experiences and wine tourism is a product that lends itself to experiential tourism. Overseas visitors in particular like to be able to easily book packages.

What are we already doing?

9.14 Our existing policies on tourism are set out within the saved policies of the 1998 Local Plan, with the clear focus of these being on self-catering accommodation including static caravan parks; touring caravan parks and camping sites in the AONB and Ashdown Forest and holiday villages and chalet parks. There is a distinct lack of policies regarding serviced accommodation such as B&Bs and hotels/guest houses, although policy does support the conversion of farm buildings to hostels or similar accommodation for walkers and cyclists. Again this is self-catering accommodation.

9.15 There are policies in the 1998 Local Plan supporting the development of tourist attractions provided they meet certain criteria such as respecting and where possible enhancing the character, heritage and environmental quality of the area. Stricter criteria are given for attractions coming forward in the AONB and Ashdown Forest.

9.16 We are actively looking at the tourism and cultural sectors that could provide opportunities within the district to expand and improve upon our existing offer and how we can support and facilitate these through the planning process. A key sector in this is viticulture and we have undertaken feasibility work which identified that within Wealden, over 148 hectares (355 acres) is under vine. The Wine Standards Board 2016 report also lists 26 vineyards, 24 vineyard owners and 5 wineries in Wealden, although it is noted that the sector is dominated by two wine estates – Rathfinny and Bluebell – who between them own two thirds of the planted area. The sector appears to be performing well, with more than 90% of the vineyards expecting growth over the next 3-5 years.



Rathfinny's Wine Estate

9.17 To support the sector we have set up a Wine Cluster group and now work with 16 of the vineyards. A new marketing campaign is underway in partnership with Locate East Sussex and aims to bring local businesses together in the consortium to:

- Help strengthen and promote the overall wine tourism offer in the county;
- help to create a step change for vineyards and wineries in the Wealden area; and
- to raise the profile of the county as an attractive proposition to potential investors, especially those in the wine tourism trade and supply chain

9.18 In the context of East Sussex, culture and tourism in Wealden is performing well, particularly its core day visitor market. In partnership with the newly formed Wealden Tourism Forum, which includes representatives from the private sector, the Council's priorities for tourism are to:

- Conserve natural beauty – Wealden's core product and main attractor;
- Raise awareness – locally and to wider audiences before they visit;
- Encourage and increase staying visitors – particularly off season;
- Encourage and increase visitor spend – from day and staying visitors and
- Deliver a fulfilling and enjoyable experience that exceeds visitor expectations and delivers positive recommendations.

9.19 We continue to work very closely with our partners at East Sussex County Council on matters involving the districts cultural and tourism offer.

What further work is needed?

9.20 We want to support our tourism and cultural sector by building on our previous Tourism Strategy and developing a Destination Management Plan. To inform the development of a new Destination Management Plan we commissioned in-depth research and analysis of the tourism sector in Wealden in 2017[41] and will need to progress this work further towards a full Destination Management Plan.

9.21 We will need to investigate the potential areas of the tourism industry that are likely to see a rise in popularity and growth, such as viticulture and experiential tourism, and look at ways we can support and facilitate these. In conjunction with this we will need to consider the ways in which we can encourage proposals in our town and village centres for leisure, cultural and tourism facilities which contribute to the diversity of the offer. We will need to test and understand the potential for the sustainable growth of the visitor economy for the benefit of the local area, and encourage the provision of accommodation to enable visitors to stay longer and spend more.

9.22 We are also seeking to undertake work specifically relating to the tourism sector and visitor accommodation to inform future local plan policies. The visitor accommodation work will consider the specific requirements of the hotel, bed and breakfast and camping industries, including providing a needs assessment for such types of overnight accommodation. The wider tourism strategy will consider our existing attractions and reasons for visiting Wealden and will provide a strategy as to the future opportunities that the council can take to support visitor attractions.

9.23 We need to work with the tourism industry to seek sustainable solutions to improving access to our tourism features and increase overnight visitors without harming our environment. Tourism will also be a focus for the Area of Outstanding Natural Beauty towns and villages, with historic village centres and independent retailers/businesses acting as gateways in to our unique landscapes. Critically, it will be vital to engage with other tourism businesses across the district, including accommodation, food and beverage and activity providers, to provide quality packages targeted towards high yield visitors.

What do we have to do?

9.24 In order to secure a high quality, sustainable tourism experience for the diverse range of visitors to the District, and ensure proposals benefit our local communities and businesses, whilst conserving and enhancing the very attributes of the district that attract visitors – its natural beauty, diverse tourism / cultural offerings and heritage – we will:

- Consider ways we can increase visitor spend the length of visitor stays and the tourism offer;
- Work closely and collaboratively with our tourism colleagues, local tourism businesses, Locate East Sussex and other relevant partners to ensure future planning policies support

41 https://acorntourism.co.uk/projects/wealden-destination-management-plan-p676591

and encourage the delivery of sustainable tourism, including attractions, experiences and accommodation;

- Critically, it will be vital to engage with other tourism businesses across the district, including accommodation, food and beverage and activity providers, to provide quality packages targeted towards high yield visitors;
- Gathering information on the current and future tourism offer in the district and the opportunities this holds for the visitor economy as well as residents;
- Identify potential new tourism opportunities for the district and investigate how these may be supported/delivered through local plan policies;
- Develop a comprehensive tourism strategy / destination management plan for the district; and
- Develop a Tourist Accommodation Supplementary Planning Document to support any related policies within the Local Plan.

Direction of travel policy options

We are considering the following policy options:

- Provide planning policies that support and encourage the sustainable growth of the tourism and cultural offer of the District through the delivery of new tourism businesses as well as supporting the expansion of existing business. This should include tourism accommodation;
- Provide planning policies which facilitate, subject to criteria, proposals that deliver high quality and sustainable tourism experiences including enhancing visitor experiences; increasing the length of stays and encouraging year round tourism;
- Provide planning policies specific to the types of tourism accommodation we want to encourage and offer, taking account of any relevant evidence base data;
- Provide policy support for farm diversification in regards to tourism offers be that accommodation or experiences;
- Look at providing policies which support and facilitate the sustainable delivery of experiential tourism such as viticulture;
- Consider policies that provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities of the district;
- Consider the location and design on any tourism related development to minimise the need for travel by car and which encourages travel by other sustainable means such as public transport, walking and cycling;
- Ensure that any planning policies for tourism development will not lead to adverse effects on the character, historical significance, appearance or amenity of the district.

This includes avoiding adverse impacts on the vitality and viability of village and town centres;

- Provide polices that prevent the loss of visitor accommodation, visitor attractions and recreation facilities unless under very specific circumstances; and

Question 7

What do you think?

31 Are there any issues or challenges that we have missed?

32 Do you agree with the proposed policy options?

33 Do you disagree with any of the options?

34 Are there any other policy options we should be considering?

35 Do you have any other comments in relation to how we can plan for tourism and culture within the district?

Chapter 10

Protecting and enhancing our natural environment, increasing biodiversity and improving the quality of our green and blue spaces



Introduction

10.1 In recent years the natural environment and biodiversity has grown in prominence within the planning context of the UK. Nationally, the Environment Bill currently before Parliament will legislate for mandatory net gains for biodiversity as a condition of most new development.

10.2 The biodiversity net gain principle (incorporated into the National Planning Policy Framework (2019) once in place will require development to exceed the pre-development biodiversity value of onsite habitats by at least 10%.

10.3 In line with the 25 Year Environment Plan, the Government expect the reformed planning system to play a proactive role in promoting environmental recovery and long-term sustainability. In doing so, it needs to play a strong part in efforts to make towns and cities more liveable through enabling more and better green spaces and tree cover.

Biodiversity - What do we already know?

10.4 The district has a significant biodiversity resource, with many European, national and local designated sites. Within the hierarchy of sites, European Sites have the greatest level of protection through the Habitats Directive and the Conservation of Habitats and Species Regulations 2017. Within the district there are two sites that have this level of protection – the Pevensey Levels and Ashdown Forest.



Bat box

10.5 At a national scale, we have 32 Sites of Special Scientific Interest (SSSIs) and 2 National Nature Reserves (NNRs). The vast majority of our SSSIs in the district are in favourable or unfavourable recovering condition, as assessed by Natural England.

10.6 The next level is biodiversity features of regional and then of local interest. These include Local Nature Reserves (LNRs) and Local Wildlife Sites (LWS). LNRs are statutory sites designated for both people and wildlife. They are places with wildlife and/or containing ecological features that are of special interest locally. They offer people special opportunities to study or learn about nature or simply to enjoy it. Within Wealden we have 7 LNRs, including Arlington Reservoir, Crowborough Country Park, Weir Wood Reservoir, Old Lodge at Nutley and Hempstead Meadow. Although LWSs have the least level of protection in accordance with national policy, they are an important local biodiversity resource. There are 101 LWSs within the district.

10.7 In addition to designated sites, we have one of the greatest concentrations of ancient woodland in the country, with around 3% of all of England's designated ancient woodlands located in our district. Although many of these woodlands (6%) are small, they can be home to rare and threatened species and they are therefore often described as an irreplaceable resource, or considered as 'critical natural capital'.



Wentworth Wood, Hailsham

10.8 As well as designated sites and habitats, we have an array of UK Biodiversity Action Plan (BAP) Priority Species, which are those species identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP). The original list of UK BAP priority species was created between 1995 and 1999. BAP species are recorded as being most prevalent in our designated sites, where the Arlington Reservoir, Pevensey Levels, Ashdown Forest and the Seven Sisters Country Park SSSIs are hotspots for recording BAP species. The District also has an array of BAP species that live outside the boundaries of designated sites and specifically protected areas.

10.9 There are numerous BAP habitats present within Wealden and the South East Biodiversity Forum incorporated the majority of these areas in the identification of Biodiversity Opportunity Areas (BOAs). BAP habitats within the District include Coastal Floodplain and Grazing Marsh; Lowland Heath; Wood-Pasture and Parkland and Lowland Mixed Deciduous Woodland. Outside of the formally designated sites these areas are considered to be the most important areas for habitat enhancement, restoration and creation and will provide us with an opportunity to positively contribute to increasing biodiversity within the district.



Pevensey Levels (Coastal and Floodplain Grazing Marsh)

Biodiversity - What are the issues and challenges?

10.10 With such abundance of biodiversity resource, the key issue we face is how to protect, enhance and conserve our biodiversity resource whilst delivering the growth and development we need, whilst also considering the impact of climate change.

10.11 With a limited amount of brownfield land and pressure for housing growth, we will need to deliver a significant proportion of our new development on greenfield sites. In assessing suitability for development we will need to consider the impact that this may have on our biodiversity resource, including direct and indirect impacts, and ways that impacts can be avoided, mitigated or compensated and an overall net gain in biodiversity achieved.

10.12 Rural development, increased urbanisation and transport infrastructure provision within Wealden all has the potential to contribute to the further fragmentation and deterioration of habitats and species. This can occur as a result of reducing the area of habitat (habitat destruction), isolating a habitat or breaking up a habitat area into smaller areas. This can result in a net loss of biodiversity and can also reduce the chance for species to migrate and populate new areas or those from which they have been lost. It is therefore important to reduce the fragmentation of habitats to enable species to move freely across our landscape. This will also increase the opportunity for species and habitats to adapt to climate change through colonisation of new areas.

10.13 We also face the challenge of how to ensure that our biodiversity is capable of adapting to the impacts of climate change. Changes such as hotter drier summers may result in species movement and if there isn't the ecological network to facilitate this movement, for example, through connected green spaces, some species may disappear. Biodiversity also provides us with opportunities to mitigate and adapt to climate change such as through flood alleviation, provision of cooling from trees, for example. The challenge for us here is how we may harness the potential of biodiversity to assist us.

10.14 In protecting our existing biodiversity we face challenges in the form of the potential for the introduction of non-native, invasive species through development and the potential for the fragmentation and isolation of habitats and assets. Finding ways to address this through the Local Plan will be important.

Biodiversity - What are we already doing?

10.15 National policy provides the highest level of protection for habitats and biodiversity requiring local plans to protect and enhance biodiversity by identifying, mapping and safeguarding components of local wildlife-rich habitats and wider ecological networks, including internationally, nationally and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them and areas identified for habitat management, enhancement, restoration or creation. It also promotes the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species together with identifying and pursuing opportunities for securing measurable net gains for biodiversity. Our existing policies for biodiversity are set out within the saved policies of the 1998 Local Plan and Policy WCS12 of the adopted Core Strategy.

10.16 Through implementing policy and guidance when making decisions on development, we are preventing a net loss of biodiversity within the district and ensuring a comprehensive network of habitats is created and maintained.

10.17 In 2016, in partnership with the East Sussex Local Wildlife Site System, we undertook a review of all of our Local Wildlife Sites (LWS) within the district in order to identify and recognise a robust and comprehensive suite of sites of substantive nature conservation value.

Biodiversity - What further work is needed?

10.18 In 2018, the government published its 25 Year Environment Plan[42] which set out the strategy for managing and enhancing the natural environment, embedding 'net gain' principles as key to environmental considerations. The 'net gain' principle whilst already incorporated into the NPPF (2019), it is also making its passage through Parliament at the moment as part of the Environment Bill (2020).



10.19 The Environment Bill (2020) was published in January 2020[43] and seeks to manage the impact of human activity on the environment, creating a more sustainable and resilient economy, and enhancing well-being and quality of life. The Bill states an intention to maintain and improve environmental designations as the UK embarks on EU transition. The 'net gain' principle is achieved in the Bill through a requirement for all planning permissions to exceed the pre-development biodiversity value of the onsite habitat by at least 10%.

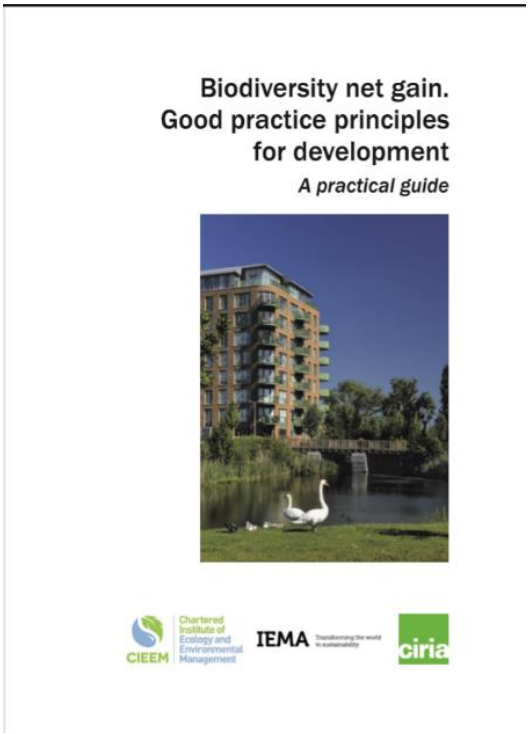
42 https://www.gov.uk/government/publications/25-year-environment-plan
43 https://publications.parliament.uk/pa/bills/cbill/58-01/0009/20009.pdf

10.20 Further to the 'net gain' principle for biodiversity, the Environment Bill also introduces Local Nature Recovery Strategies to be prepared for areas of England. The Secretary of State is to determine the areas within England to which individual local nature recovery strategies are to relate, with a local nature recovery strategy for an area to be prepared and published by the responsible local authority. A Local Nature Recovery Strategy for Sussex, and Nature Recovery Network, is currently being progressed by the Sussex Local Nature Partnership.



10.21 We will need to undertake further research into how we can implement net gain requirements, and how we can deliver biodiversity improvements at a local level. We will work in partnership to gather information on the habitats we have within the district and look to methods of determining their 'value' in the way they will be considered through the planning process in order to assist us in deciding what a net gain in biodiversity looks like for Wealden, how this will be determined and how it will be delivered through the Local Plan.

10.22 We will also need to undertake work to identify and understand the practicalities of implementing a biodiversity net gain requirement as part of the Local Plan, and how we could incorporate such a requirement for all of our developments. This could include Supplementary advice to accompany a local plan policy.



Biodiversity - What do we have to do?

10.23 In order to support the delivery of the growth we need whilst protecting and enhancing our biodiversity and achieving net gains for biodiversity, we will:

- Consider the policy mechanisms by which we will ensure development proposals deliver the required net gains in biodiversity post development. In doing so we will work with our partners to ensure some degree of consistency in approaches across East Sussex;
- There will be circumstances where on-site net gains are not possible and developers will

instead need to pay a contribution for habitat creation or improvement elsewhere. We will explore the mechanism for deciding where offsite net gains are to be sought;

- Where they are available and relevant, we will need to take account of other studies and strategies, such as the Natural Capital Investment Strategy (2019) published by the Sussex Local Nature Partnership and the South Downs National Park's 'People and Nature Network' – which identifies two Natural Capital Investment Areas that extend into the district; and
- Work closely and collaboratively with East Sussex County Council; Town and Parish Councils; Natural England; Sussex Local Nature Partnership and other relevant partners to ensure that our approach to protecting and enhancing our biodiversity (including net gains) is appropriate.

Direction of travel policy options.

We are considering the following policy options:

- Provide a policy to seek biodiversity net gains onsite and only consider other avenues when this is not possible and it is supported by firm evidence;
- Provide a criteria based policy for allowing offsite biodiversity net gains to be delivered;
- Continue to resist development proposals that would be likely to adversely affect the biodiversity of the district including designated and non-designated sites as well as individual biodiversity features;
- Provide policies which support and encourage development that maintains, restores, enhances and where possible creates biodiversity and ecological networks;
- Look at the potential to establish a strategic network of areas/sites that could be identified and allocated for off-site biodiversity net gains and set this within policy;
- Consider the potential to require more than the national 10% biodiversity net gain requirement for development;
- Look to provide planning policies which retain and protect specific biodiversity features such as trees and hedgerows on a district wide basis; and
- Consider the introduction of buffer zones for sites with importance for nature conservation.

Question 8

What do you think?

36 Are there any issues or challenges that we have missed?

37 Do you agree with the proposed policy options?

38 Do you disagree with any of the options?

39 Are there any other policy options we should be considering?

40 Do you have any other comments in relation to how we can plan for biodiversity within the district?

Green Infrastructure - What do we already know?



The River Cuckmere at Alfriston

10.24 Green infrastructure is a network of multi-functional green and blue spaces which are capable of delivering a wide range of environmental and quality of life benefits for local communities. It includes all forms of recreational open space and areas of particular importance or potential for wildlife. The network of green infrastructure is therefore of importance for wildlife and eco-systems, and for meeting a wide range of social, environmental and economic needs and functions. It covers both rural and urban areas of the District and guidance recognises that it is integral to the health and quality of life of sustainable communities. In order to maximise the benefits, national policy places emphasis on the creation and maintenance of linkages between green spaces.

10.25 The district has a significant amount of green and blue spaces including but not limited to country parks, woodlands, trees, hedgerows, parks, public rights of way, rivers, reservoirs, farmland, churchyards and natural/semi natural green spaces.

10.26 Providing more and better quality green spaces will bring about key long-term improvements in people's health (both physical and mental) as well as the environment and biodiversity. Creating, enhancing and protecting existing green and blue spaces and their connectivity with each other and the wider natural environment, will help in achieving a multi-functional green infrastructure network, as well as assisting us in addressing issues such as climate change through the provision, for example, of alternatives to using the car to travel.

10.27 Green infrastructure is especially relevant to housing and economic growth and to the regeneration of urban areas. Here green infrastructure is about development going hand-in-hand with the protection and enhancement of existing environmental assets and the creation of new ones. It's about putting the environment right at the centre of the planning process and producing a strategic and linked, multi-functional network of spaces with benefits for people and wildlife. It's also about underpinning the sustainability of a town or city, including making it resilient to the effects of climate change and enabling local authorities to meet their duty to conserve biodiversity.

10.28 Green infrastructure also relates to the rural environment. In the wider countryside, green infrastructure is often viewed at a larger scale, encompassing large country or regional parks; extensive habitats, major landscape features such as river corridors and flood meadow landscapes, and the identification of wide green corridors and ecological networks. Green infrastructure at this scale can provide the wider framework and context for planning green infrastructure at a more local level.



South Down Way, Littlington

10.29 In addition to our designated biodiversity sites, there are also a range of habitats of conservation importance within and outside of these designations and these natural and semi-natural habitats are a key green infrastructure asset, making a significant contribution to our green infrastructure network, although there are opportunities for improvements. The character and quality of the landscape within the district is also a key green infrastructure asset contributing to a number of important ecosystems services including sense of place/inspiration; sense of history; tranquillity; recreation; and biodiversity and geodiversity.

10.30 Our rural environment and greenspaces support a rich variety of productive landscapes including farmland, coppice woodlands and allotments, as well as supporting local energy and food production.

10.31 Our water resources provide a vital function in supporting the health of the natural environment and well-being of our communities. For example, the numerous rivers and streams provide important blue corridors for the dispersal of wildlife between otherwise fragmented and isolated habitats within the landscape and urban areas. These blue corridors can also provide access links for connecting people between settlements and the surrounding landscape via walking and cycling routes. These 'blue infrastructure' assets make a significant contribution to our green infrastructure network.

10.32 There is growing evidence that access to, and enjoyment of, natural and semi-natural greenspaces enhances people's health and well-being, particularly in areas of social deprivation. Providing access to natural greenspace and a network of green access routes within and surrounding the district, particularly for communities in areas of social deprivation, is a key priority for the Council.

Green Infrastructure - What are the issues and challenges?

10.33 The provision of green infrastructure is now widely recognised as contributing towards creating places where people want to live and work, both in rural and urban settings. The concept of green infrastructure is firmly embedded in the NPPF and it is an essential component of good planning for urban and rural areas, particularly in the face of climate change. However, increased awareness of the importance of green infrastructure does not always go hand in hand with a full understanding of what it is, the range of benefits it can deliver and how it can be promoted and delivered through planning policies and processes. In addition, whilst you are never far from our green/blue infrastructure, not everyone in the district can easy access those spaces and there are deficiencies in most parts of the district of at least one type of green/open space.

10.34 The vast majority of the district is rural and we have been provided with a high housing target to deliver. We have a shortage of brownfield land within the district to develop and this shortage will put pressure on existing green spaces to be developed, which can lead to their fragmentation and degradation.

10.35 However, whilst there will be pressure on our countryside, development will also provide opportunities to enhance/create green and blue spaces, improving accessibility for all and make connections that may not have previously existed or are long degraded. If we get this right then we have the opportunity to deliver on our health and well-being objectives; address any open space or green space deficiencies; enhance biodiversity; address overheating and the urban heat island effect; improve air quality, sustainable drainage; carbon sequestration to name a few. Therefore, whilst we will need to carefully consider the locations of where we deliver growth we will also need to consider how this growth can improve our green infrastructure network.

Green Infrastructure - What are we already doing?

10.36 Our existing local policy framework for green infrastructure and green spaces is set out within Policy WCS13 of the adopted Core Strategy (2013)

10.37 We have a detailed audit of the quantity, quality and accessibility of the districts green spaces through the Green Infrastructure Study 2017 and this also highlights the deficiencies within the network and the opportunities for enhancements and protections of individual green/blue spaces and the green infrastructure network as a whole. The Study also provides information on the quantity, quality and spatial distribution of the green infrastructure network itself and sets out a number of green infrastructure principles and standards. We are currently looking to undertake work to further develop the recommendations and opportunities identified within the Green Infrastructure Study (2017) into a comprehensive Green Infrastructure Strategy for the district.

10.38 In 2018 and 2019 we delivered two new green spaces as part of development schemes, totalling over 146 acres. Walshes Park in Crowborough (2018) and Horsted Green Park in Uckfield (2019). Technically known as Suitable Alternative Natural Greenspaces or SANGS, the sites are required to alleviate visitor pressure at Ashdown Forest, however, they offer a high quality and extensive open and green space for general public use and form an integral part of the green infrastructure network within the District, with multiple benefits including walking networks, habitats for wildlife and a sense of wellbeing.



Horsted Green Park SANG, Uckfield

Green Infrastructure - What further work is needed?



Walshes Park SANG, Crowborough

10.39 We have a detailed understanding of the current state of green infrastructure assets, including our green and blue spaces, and the green infrastructure network within the District through the Green Infrastructure Study (2017)[44]. However, we would like to build on our existing evidence base for green infrastructure and will be asking specialist consultants to undertake work and develop a Green Infrastructure Strategy for the district. This Strategy will help guide future investment in, and development of, our green infrastructure network, green/blue spaces and green assets, as well as help ensure that these assets and spaces, together with the green infrastructure network overall, achieve multi-functionality (where appropriate) in order to address issues including climate change, loss of biodiversity and improvements to health and well-being. The work for the Strategy will need to identify key green infrastructure projects that can be taken forward within the district as well as identifying those bodies with the ability to take the projects forward and any potential funding mechanisms.

10.40 We will need to undertake work to update the existing green infrastructure study and further develop a set of green infrastructure standards and principles that can be delivered

44 Wealden Green Infrastructure Study (May 2017). https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-evidence-base/bio-diversity-and-green-infrastructure/

through policies in the Local Plan in relation to developments as well as the overall green infrastructure network.

Green Infrastructure - What do we have to do?

In order to support the delivery of the growth we need whilst protecting, enhancing and further contributing to the green infrastructure network, green assets and green/blue spaces of the district we will:

- Work closely with colleagues at East Sussex County Council, neighbouring authorities, Sussex Local Nature Partnership and other relevant partners on the production of a Green Infrastructure Strategy for the district;
- Work closely with our Town and Parish Councils; development management colleagues; residents and other partners to ensure open/green space standards and principles are implemented;
- Develop a Green Infrastructure Strategy identifying appropriate green infrastructure projects relevant to the district which are achievable and support the creation of a multi-functional green infrastructure network; and
- Consider ways to ensure new developments incorporate green spaces and green infrastructure at the outset of a schemes conception;
- Direct development to areas where there is likely to be the least impact on existing green/blue spaces and the green infrastructure network;
- Continue to support and provide advice to Neighbourhood Plan groups so that they can designate Local Green Spaces as well as realising a positive vision for green infrastructure in their area;
- Look to protect and enhance our existing green infrastructure network by ensuring existing linkages between green/blue spaces are protected and new ones created where possible/appropriate;
- Ensure that green spaces are connected and accessible to assist in the provision of walking and cycling routes;
- Ensure that development, particularly housing development, is made healthy through the provision of good quality green spaces and greening measures within their design and layout; and
- Develop an open/green space Supplementary Planning Document to support any related policies within the Local Plan.

Direction of travel policy options.

We are considering the following policy options:

- Continue to resist the inappropriate loss of green infrastructure, green infrastructure assets (trees, hedgerows, open spaces etc.) and green/blue spaces and support

proposals to enhance access to, as well as the quality and quantity of, green infrastructure;

- Provide a policy setting out the strategic green infrastructure network in the district and identify what development will need to achieve in relation to it;
- Provide policies setting out green infrastructure principles and standards that developments will need to achieve, using the green infrastructure evidence base;
- Provide policies to create green infrastructure links between new developments and the wider green infrastructure network including existing and new green/blue spaces;
- Include green infrastructure within any generic infrastructure policy, alongside more traditional 'grey' infrastructure i.e. roads;
- Provide support for the designation of Local Green Spaces where appropriate in Neighbourhood Plans but also through the Local Plan;
- Provide policies to support the creation of new green spaces and the protection of existing. Include requirements for linkages to be made between green spaces themselves and developments;
- Ensure that future green and open space needs are planned for in areas with the potential for substantial change and support the creation of new publicly accessible green and open space in areas of deficiency; and
- Enhance green and open spaces to provide a wider range of benefits for residents. Examples could include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement or flood storage

Question 9

What do you think?

41 Are there any issues or challenges that we have missed?
42 Do you agree with the proposed policy options?
43 Do you disagree with any of the options?
44 Are there any other policy options we should be considering?
45 Do you have any other comments in relation to how we can plan for green infrastructure and green/blue spaces within the district?

Chapter 11

Protecting our high quality landscapes, our heritage and cultural assets



11.1 The District's unique and distinctive landscape, historic and cultural assets are highly valued, and we want to protect what is special and improve our areas for residents, businesses and visitors.

Landscape - What do we already know?

11.2 The District's landscape is defined by numerous processes and variables including geology, soils, topography, land cover, hydrology, historic and cultural development and climate, the combination of which provide the district with a diverse and distinctive landscape as well as a historic, unique and distinctive settlement pattern. The quality of the landscape is also a valuable resource and asset contributing to the district's rural economy, ecosystem services and providing opportunities for recreation. It also contributes to making Wealden an attractive place to live. Protecting and enhancing our beautiful landscape for our residents is a key aim of the Council.



Ashdown Forest

11.3 Wealden District falls within three distinct National Landscape Character Areas[45] including the High Weald, the Low Weald and the Pevensey Levels. The South Downs Character Area also crosses the southern part of the district.

45 National Landscape Character Areas are defined by Natural England.

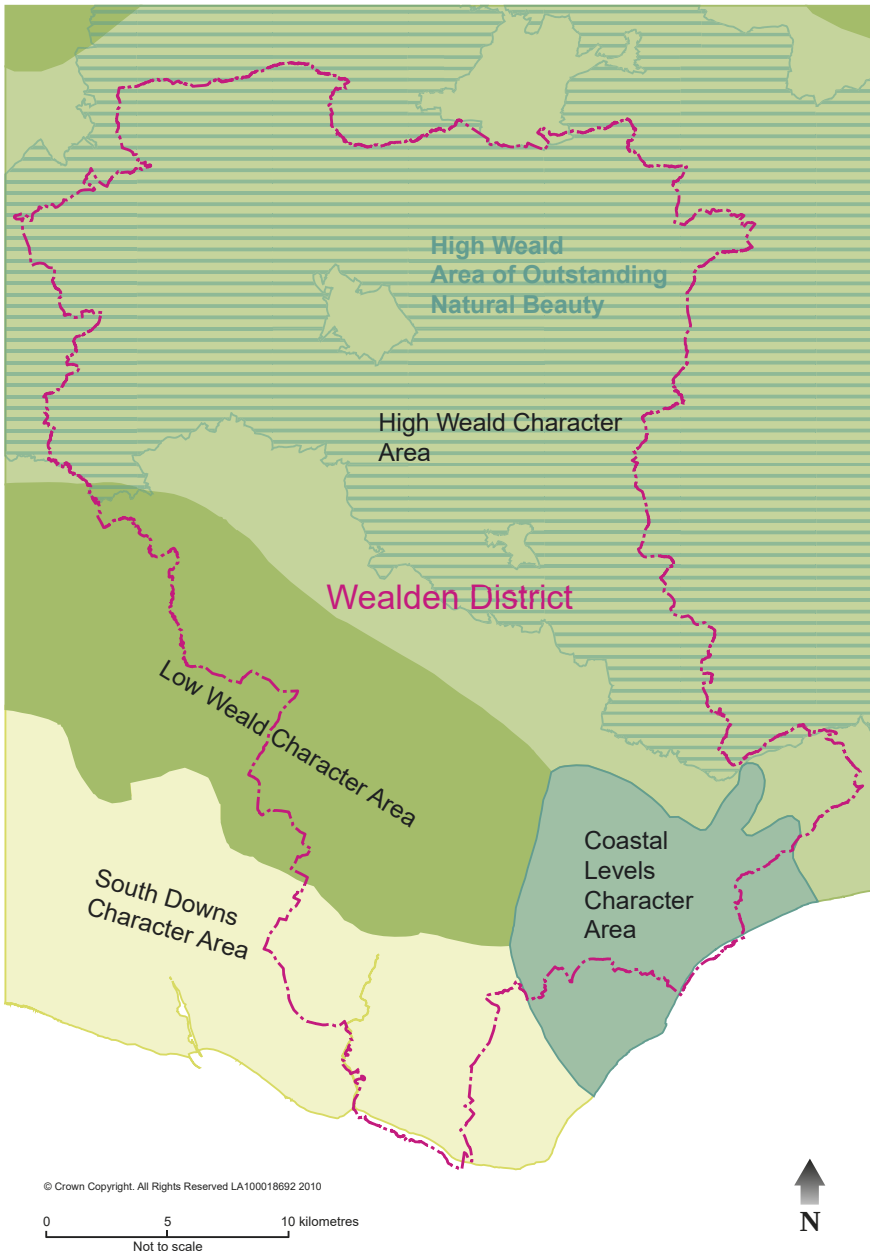


Figure 19 High Weald, Low Weald and the Pevensey Levels National Landscape Character Areas.

11.4 The High Weald character area includes the nationally designated High Weald Area of Outstanding Natural Beauty (AONB), and is afforded the highest status of landscape protection, where great weight is given to the need to conserve its landscape and scenic beauty. The High Weald AONB covers 53% of the District. The primary purpose of the AONB designation is to conserve and enhance the natural beauty of the Area. The important features of the High Weald AONB are detailed within the High Weald Management Plan[46], which also sets out the objectives for protecting, conserving and enhancing its locally distinctive landscape features. Parts of the High Weald national landscape character area go beyond the boundary of the designated High Weald AONB, and whilst this area is not designated it shares some similar landscape characteristics.

11.5 The Low Weald landscape is often softly undulating with blocks of ancient woodland, ponds and streams, in direct contrast to the steep sided wooded ghylls and robust features of the High Weald.

11.6 The Pevensey Levels comprises extensive tracts of low-lying reclaimed wetland with pockets of raised land typically associated with farm buildings and settlements. The landscape has a distinctive windswept feel and large (mainly pasture) fields are set within an irregular network of drainage ditches and banks, with few hedges and trees. Although intensively farmed, much of the area is still wet pasture and is managed for grazing.

11.7 The South Downs Character Area in the south of our District is also a designated National Park. It covers approximately 7% of the district, however whilst within our District it lies outside of our administrative area for planning purposes. The National Park is its own planning authority.

11.8 The purpose of the South Downs National Park designation is two-fold - to 'conserve and enhance natural beauty, wildlife and cultural heritage' and to 'promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public'.

11.9 One of the core principles of the National Planning Policy Framework (NPPF) is that planning should recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland[47]. It also outlines the importance of protecting and enhancing valued landscapes including designated landscapes and also the wider countryside. It is vital that landscape character is understood in order to manage future change and impact.

11.10 As well as the physical landscapes and their features, we also know that tranquillity and the darkness of the night skies are important elements of the Districts landscapes. The Campaign to Protect Rural England's (CPRE) Night Blight Report and mapping[48] shows that

46 http://www.highweald.org/high-weald-aonb-management-plan.html
47 NPPF (2019) Paragraph 170b
48 CPRE Night Blight: Mapping England's light pollution and dark skies (2016) https://www.nightblight.cpre.org.uk/images/resources/Night_Blight_cpre.pdf and https://www.nightblight.cpre.org.uk/

we are the 20th darkest local authority area of the 326 local authorities in England. The majority of our area (89.2%) falls within the darkest category for night time brightness.

Landscape - What are the issues and challenges?

11.11 The vast majority of the district is classified as farmland (76%) with 'natural' and 'green urban' land accounting for 20%. The built up area of the district amounts to 4%[49]. This emphasises the overall rural, countryside character of the district. We are also a district that has been provided with a high housing target to deliver and, with relatively low levels of brownfield land, we will need to deliver this growth on mainly Greenfield sites. We will need to carefully consider the locations of where we can deliver growth whilst also ensuring that we protect and enhance our most valued landscapes and their environmental, agricultural and historical features.

11.12 When considering growth options, it is not only the landscape as a whole we need to consider but also the impact growth may have on landscape features within it, such as hedgerows, trees, field and settlement patterns and this applies to designated and non-designated landscapes. There may be some areas of the district's landscapes that are deemed to have low sensitivity overall, however within them there may be features of high sensitivity such as a hedgerow bordering a site for example. We will need to consider this level of sensitivity when looking at how and where we deliver the growth we need and mitigate any impacts.

11.13 With the High Weald AONB extending to 58% of the local plan area, many of our settlements are either located within the AONB, (Crowborough and Heathfield) or are surrounded by the AONB (Forest Row, Wadhurst and Mayfield). The High Weald AONB is one of the best surviving medieval landscapes in northern Europe. Within the AONB, national policy provides the highest level of protection and there is a requirement to limit major development other than in exceptional circumstances[50]. The protection of the AONB landscape is important in terms of its setting and character, as well as providing economic, social and ecological value. Its natural processes are also important, such as hydrology and pollination, as are views into and out of the AONB.

11.14 The Council has a legal duty to 'enhance and conserve' the AONB landscape and its features. However, we are also under pressure to meet the demand for housing and employment growth. For example, where we are unable to meet our housing growth targets outside the AONB, we may need to consider meeting our growth requirements within the AONB. We will also need to consider whether there is a need for affordable housing in towns and villages located in the AONB or for other social / community infrastructure. Should this be necessary, one of the key issues that we will need to address is how we can deliver growth and mitigate against any adverse impacts to either the landscape, natural processes or features. Whilst small scale growth has the potential to be accommodated more easily within

49 Corine Land Cover Inventory: A Land Cover Atlas https://figshare.com/articles/A_Land_Cover_Atlas_of_the_United_Kingdom_Maps_/5219956

50 See NPPF paragraph 172

the AONB landscape, many small scale developments in one location could result in cumulative impacts in relation to the character and settlement pattern and other landscape features.



View across landscape from Boreham Street

11.15 Whilst we are not responsible for planning in the South Downs National Park, the area of our district adjacent to the South Downs National Park, including areas of the Low Weald and Pevensey Levels, is visible both to and from the National Park. Any development within the setting of the National Park and also from the AONB will need careful consideration to address potential impacts to ensure that natural beauty is maintained.

11.16 We also face the challenge of how we deliver growth and development within the landscapes so that it is sympathetic to the landscape character whilst not stifling innovative design for example. This will be a key issue in the formulation of our policies around design as well as landscape.

11.17 In the face of the climate crisis and climate emergency declared by the Council in December 2019, renewable energy generation and carbon sequestration is going to become more prominent. This could impact on the landscape of the district through the potential impacts that solar farms or wind turbines may have on views and setting, but it also presents opportunities to harness the ability of the landscape and its features to assist in reducing carbon emissions i.e. through tree planting, habitat creation and alternative ways in managing the land for example. The landscape is also able to play a greater part in the management of flooding through the implementation of natural flood management techniques, which can also double as water storage areas in times of drought – improving biodiversity and reducing flood risk downstream (of river flooding). We will need to consider this alongside our approach to protect and enhance the landscape whilst harnessing its ability to help us adapt to and mitigate climate change impacts.



The River Cuckmere, Exceat

11.18 From our early understanding of the Government's White Paper consultation which seeks to reform the Planning System in England[51], protecting nationally designated landscapes such as the High Weald AONB and the South Downs National Park is likely to continue. We also understand that under the proposed 'Protected Areas' described in the White Paper, this could also include areas of open countryside outside of land in the 'Growth' or 'Renewal' areas it proposes. Some areas may be defined nationally, whilst others locally on the basis of national policy. We will need to account for any planning reforms as part of our plan-making when these are made by central Government.



Landscape - What are we already doing?

11.19 National planning policy and guidance provides the highest level of protection to landscapes, with a significant focus on designated landscapes in particular – National Parks, the Broads and AONBs. It sets out that their landscape and scenic beauty must be conserved and enhanced. However, landscape over all, whether designated or not, is also protected by the national framework insofar as it should be conserved, protected and enhanced; developments should be sympathetic to the local landscape and degraded or despoiled landscape should be remediated where possible.

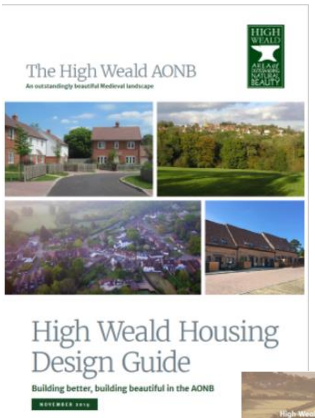
11.20 In terms of non-designated landscapes, we currently have established countryside and environmental policies as well as development boundary policies that address the district's landscapes. Development boundaries help to focus development within existing established built up areas and thus help protect the landscape and countryside. We also protect trees and woodlands; require detailed landscaping for development schemes; have protected the Low Weald; reduced light pollution and protected open areas within settlements through our policies. In terms of housing and commercial development in the countryside, our policies require that proposals are not intrusive in the landscape; respect the countryside/rural setting and character in terms of their scale, form and design and only allow the sub division of larger rural properties into smaller units under certain criteria.

11.21 We have ensured full scrutiny of landscape impacts in regards to development and prioritising brownfield sites wherever possible and utilise the Landscape and Settlement Character Assessments (2014 and 2016), including their recommendations to address landscape impacts, in our decision-making.

51 Planning White Paper August 2020.

11.22 We are a partner of the High Weald AONB Joint Advisory Committee which comprises representatives of the fifteen local authorities with land in the AONB and government bodies responsible for protected landscapes in England. As part of this partnership, we provide funding and officer time to support the High Weald AONB in its activities, primarily the production of the Management Plan, embedding the use of the Management Plan in our decision making.

11.23 The AONB Design Guide[52] provides clear, succinct, practical and consistent advice on design expectations for new housing development within the High Weald AONB, enabling higher quality and landscape-led design to come forward that reflects intrinsic High Weald character and sense of place, without stifling innovation and creativity.





11.24 The Colour Study [53] documents the existing colours in the High Weald AONB landscape and provides advice on what colours can be used in new development to help to integrate it into the landscape successfully. It also contains practical advice on different materials and suppliers to inform development proposals at an early stage in their design process, and assist us in assessing choice of colour and materials in the determination of planning applications.

11.25 Both documents are used by planning officers, developers and Council Members to ensure the delivery of high quality developments within the AONB landscape.

Landscape - What further work is needed?

11.26 We have an understanding of the landscape character of the district from previous work that we undertook in 2014 and 2016. This includes the Wealden Landscape and Settlement Character Assessments (2014 & 2016)[54] and the Wealden Local Plan Sites Landscape and Ecological Assessment Studies (2017)[55].

11.27 We would like to build on our existing evidence base and will be asking landscape consultants to undertake a study that will assist us to understand the sensitivity of our landscapes to growth. This will include considering both housing and employment growth but

52 http://www.highweald.org/look-after/planning/design-guide.html
53 http://www.highweald.org/look-after/planning/colour-study.html
54 Wealden Landscape and Settlement Character Assessment (2014) and Landscape and Settlement Character Assessment Supplementary Report (2016). https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-evidence-base/landscape/
55 Wealden Local Plan Sites Landscape and Ecological Assessment Studies (2017)Wealden Local Plan Sites – Landscape and Ecological Assessment Study (July 2017) and South Wealden – Landscape and Ecological Assessment Study (April 2017) https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-evidence-base/landscape/

also renewable energy sources. We may also need to consider other landscape matters that are connected to climate change such as tree planting or carbon sequestration, for example. From undertaking this work we will be able to identify those areas that we should protect and those areas that are less sensitive to growth and change and how growth and change can be managed, mitigated or indeed where landscape enhancements can take place, such as through softening the urban edge through design.

11.28 Should growth be required within the High Weald AONB we will need to assess and understand whether development would result in a detrimental effect on the environment, the landscape and recreational opportunities and the extent to which development could be moderated. We will undertake a specific piece of work to consider these factors. We may also need to undertake a study to consider the setting of the South Downs National Park should this be required to assist in defining the overall growth strategy.

Landscape - What do we have to do?

11.29 In order to support the delivery of the growth we need whilst protecting and enhancing the landscape, natural processes and features we will:

- Direct development to areas where there is likely to be the least impact on the landscape and landscape features of the district;
- Consider ways to encourage new developments in areas where they can make a positive contribution to the landscape;
- Consider ways in which to identify and protect landscape features of importance within developments; and
- Work with neighbouring authorities, partners, Natural England and the High Weald AONB Unit in developing our approach to consider development and the district's landscape;

Direction of travel policy options.

We are considering the following policy options:

- To continue to resist inappropriate loss of valued landscapes and approving proposals that will conserve or enhance landscape character and its wider benefits;
- Providing a criteria based policy for allowing development in the countryside;
- Consider a policy that protects green and blue corridors;
- Consider a policy which is specific to design within the landscape – designated and non-designated – and set out certain criteria;
- Develop a High Weald AONB specific policy requiring proposals to clearly demonstrate how they have regard to the objectives of the High Weald AONB Management Plan and High Weald Design Guide;

- Consider a policy which protects and enhances rural landscape features in their own right i.e. hedgerows, field patterns, settlement patterns, trees, water features; and
- Consider the inclusion of a dark night skies policy which will control lighting schemes in those parts of the district with the darkest skies.

Question 10

What do you think?

46 Are there any issues or challenges that we have missed?
47 Do you agree with the proposed policy options?
48 Do you disagree with any of the options?
49 Are there any other policy options we should be considering?
50 Do you have any other comments in relation to how we can plan for landscape within the district?

Heritage - What do we already know?



St Johns Church, Crowborough

11.30 The District's historic environment is one of our greatest assets. It is rich and varied across both urban and rural contexts, with many high quality historic places and buildings that have formed part of the landscape for centuries. Our historic environment has a distinct character influenced by the landscape; settlement patterns; farmsteads; locally available materials; and historic economic and agricultural uses such as the iron and hop industries. We recognise that the historic environment is an irreplaceable resource which should be conserved for future generations. It also provides a backdrop to sustainable tourism and the local economy by creating places and an environment which is unique to the district.

11.31 Agriculture has had a particular impact on the historic environment, not just through the use and division of land, but the fact that we have one of the highest concentrations of surviving early farmsteads anywhere in Europe within our district.

11.32 In the 18th and 19th century, the hop industry was significant in this area, with the scattered distinctive Oast buildings within the High and Low Weald areas, a particular historic feature of the district. Recent development-led archaeological work in the district has revealed new and important evidence for settlement development during the prehistoric, Romano-British, and subsequent periods.

11.33 We have around 2,200 Listed Buildings, 20 registered Historic Parks and Gardens, and 104 Scheduled Monuments within the district (including that part of Wealden falling within the South Downs National Park). In addition there are 33 Conservation Areas within the local plan area, all of which were designated by the Council in March 2017.

11.34 The East Sussex Historic Environment Record (ESHER) presently records a total of around 11,500 designated and non-designated heritage assets within the district. Of this total, some 20% are designated, but around 80% are non-designated.

11.35 In addition to the physical asset itself, we must also consider impacts on the 'setting' - the surroundings in which the asset is experienced – of our heritage assets.

Heritage - What are the issues and challenges?

11.36 Currently national policy and guidance provides the context for conserving and enhancing the historic environment, requiring local plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy must account for:

1 the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
2 the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
3 the desirability of new development making a positive contribution to local character and distinctiveness; and
4 opportunities to draw on the contribution made by the historic environment to the character of a place.

11.37 The NPPF also considers heritage assets to be an irreplaceable resource so that they can be enjoyed for their contribution to the quality of life of existing and future generations as well as their effective conservation delivering wider social, cultural, economic and environmental benefits.

11.38 Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in everyday use to as yet undiscovered, undesignated buried remains of archaeological interest. Ensuring historic buildings remain in active use, which is consistent with their conservation, is a positive means to preventing their neglect and decay and it is recognised that this is likely to require sympathetic changes to be made from time to time.

11.39 However, the pressure for development and growth within the district may result in increasing pressure to develop on sites in a way that could have an impact on the historic character of the district. We will need to carefully consider how we can deliver the development we need whilst protecting and enhancing our heritage assets and historic environment.

11.40 From what we understand of the Government's White Paper on Planning Reform[56] the policy context for the historic environment and heritage assets is unlikely to change as it proposes that local plans clearly identify the location of internationally, nationally and locally designated heritage assets, such as World Heritage Sites and conservation areas, as well as locally important features such as protected views. The White Paper also seeks to ensure historic buildings play a central part in the renewal of cities, towns and villages, acknowledging that many will need to be adapted to changing uses and to respond to new challenges, such as mitigating and adapting to climate change.

11.41 The Government want to review and update the planning framework for listed buildings and conservation areas, to ensure their significance is conserved while allowing, where appropriate, sympathetic changes to support their continued use and address climate change. In doing so, the Government wants to explore whether there are new and better ways of securing consent for routine works, to enable local planning authorities to concentrate on conserving and enhancing the most important historic buildings;

11.42 Our most important designated heritage assets such as our registered parks and gardens, listed buildings and conservation areas enjoy protection from the policies in the NPPF and this is likely to continue under the proposed changes put forward in the White Paper. However, there is a greater risk to our non-designated heritage assets, such as locally important historic buildings, that could be negatively affected by development that delivers growth but at the expense of local character.

11.43 Climate change is a key driver and deliverable of the planning system, however achieving measures such as energy efficiency within our historic buildings is a particular challenge for us. Historic buildings are themselves generally highly 'sustainable' having usually been built of local, natural materials with a low inherent carbon footprint - all ultimately recyclable. However, integrating renewable energy technologies and energy saving measures into historic and listed buildings can be difficult because of their visual and physical impact. Maintaining the historic character and appearance of these buildings needs to be the prime focus and, in some cases, the possibility of harm to, or loss of, historic fabric negates such retro-fitting. This will need careful consideration to ensure that relevant opportunities are taken to improve energy conservation without causing harm.

11.44 Another issue we face is around the design and sometimes piecemeal approach of development within our historic towns and villages, with some developments being 'out of the box' standardised designs that do not reflect or respect the historic nature of the settlement they are located in/close to. This can be particularly true when it comes to development

56 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf

involving historic farmsteads and/or buildings, especially in relation to extensions and changes of use. We have a number of historic farmsteads within the district, particularly in but not restricted to, the High Weald AONB. The challenge is making sure that any such developments are sympathetic to their context whilst at the same time not stifling innovative designs that may complement the existing historic farmstead, buildings or uses.

Heritage - What are we already doing?



East Hoathly

11.45 Our existing policies on the historic environment are set out within the saved policies of the 1998 Local Plan, with the key policy focusing on Conservation Areas (Policy EN19). For Listed Buildings, Historic Parks and Gardens and archaeology, we refer to and rely on national policy and guidance in the NPPF and NPPG. Chapter 12 of the Wealden Design Guide Supplementary Planning Document (SPD) relates to alterations and extensions to listed buildings and we use this as part of the overall policy context dealing with the historic environment and heritage assets in the district. The Design Guide is widely and frequently used by developers and in our decision making process for development which involves or may affect a heritage assets and/or its setting. .

11.46 In historic areas of the district, the Council has designated 41 Conservation Areas (8 within the South Down National Park Authority area) in recognition of their particular historic and architectural interest.. These designations bring in additional protections that help drive up design quality. This is achieved in particular through the legal duty for new development to preserve or enhance the character and appearance of designated conservation areas. The Council is now building on these designations by producing conservation area appraisals for each of our conservation areas. These documents explain what it is about these areas that make them special and provides further guidance to developers. The appraisals provide detailed information of the character and composition of the conservation areas and assist to inform the design of development within them, including looking at materials, densities and layouts amongst other things. . The appraisals will be supported by a Conservation Area Management Plan to ensure that the designated areas are managed in such a way to prevent the erosion of historic detail and character.

11.47 In addition, we also plan to work with Town and Parish Council's to draw up Article 4 Directions for each area to further control erosion of historic detail and character.

Heritage - What further work is needed?

11.48 We are producing conservation area appraisals for those parts of the district with a designated conservation area and these will help inform policy development and decision

making, specifically in terms of the design of development. We will also need to consider our strategy for the conservation, enhancement and enjoyment of heritage assets that are not within a designated Conservation Area and Historic England have produced guidance[57] on how to achieve the objectives of the NPPF for the historic environment within a local plan.

11.49 With a key deliverable of the planning system being tackling climate change, we will need to investigate ways in which we can best accommodate energy efficiency measures (including renewables) into historic buildings. In addition, we will need to consider the scale of development we are likely to have to deliver and its location in relation to their proximity of heritage assets and their setting. This includes historic landscapes, archaeology as well as buildings and Conservation Areas.

11.50 We will also need to consider preparing a local heritage list in order to ensure that those heritage assets not afforded national protection, but which have local significance and importance, are identified, recorded and protected.

Heritage - What do we have to do?

11.51 In order to support the delivery of the growth we need whilst protecting and enhancing our historic environment and heritage assets we will:

- Direct development to areas where there is likely to be the least impact on heritage assets and the historic environment of the district;
- Consider ways to encourage new developments in areas where they can make a positive contribution to the historic environment i.e. through the sustainable reuse of an historic building;
- Identify specific opportunities within the district for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in particular areas of the district. To deliver such a strategy, we will need to develop specific policies for example, in relation to the use of buildings and design of new development and infrastructure; and
- Work in partnership with East Sussex County Council, Historic England, Neighbourhood Plan groups, our heritage colleagues and other relevant bodies to ensure future planning policies protect and enhance the historic environment and heritage assets whilst not stifling innovative designs and developments that could add to the historic character of the district.

57 Historic England (2015). The Historic Environment in Local Plans: Historic Environment Good Practice Advice in Planning 1. Available at: https://historicengland.org.uk/advice/planning/planning-system/#Section5Text

Direction of travel policy options.

We are considering the following policy options:

- Provide district wide planning policies to conserve and enhance the significance of the historic environment through the positive management of development affecting heritage assets (designated and non-designated), including through the safeguarding of heritage assets and their setting.
- Provide planning policies that support and encourage the appropriate use of historic buildings, including historic farmsteads, to ensure their continued viability whilst protecting their character and setting;
- Provide planning policies that will secure the conservation of a heritage asset for the foreseeable future through 'enabling development' that might otherwise conflict with other planning policies;
- Provide a criteria based planning policy for the consideration of development that relates to demolition involving heritage assets and;
- Provide a policy for the sustainability of historic buildings and heritage assets (i.e. in relation to renewable energy generation, energy efficiency measures taking a 'whole building' approach.

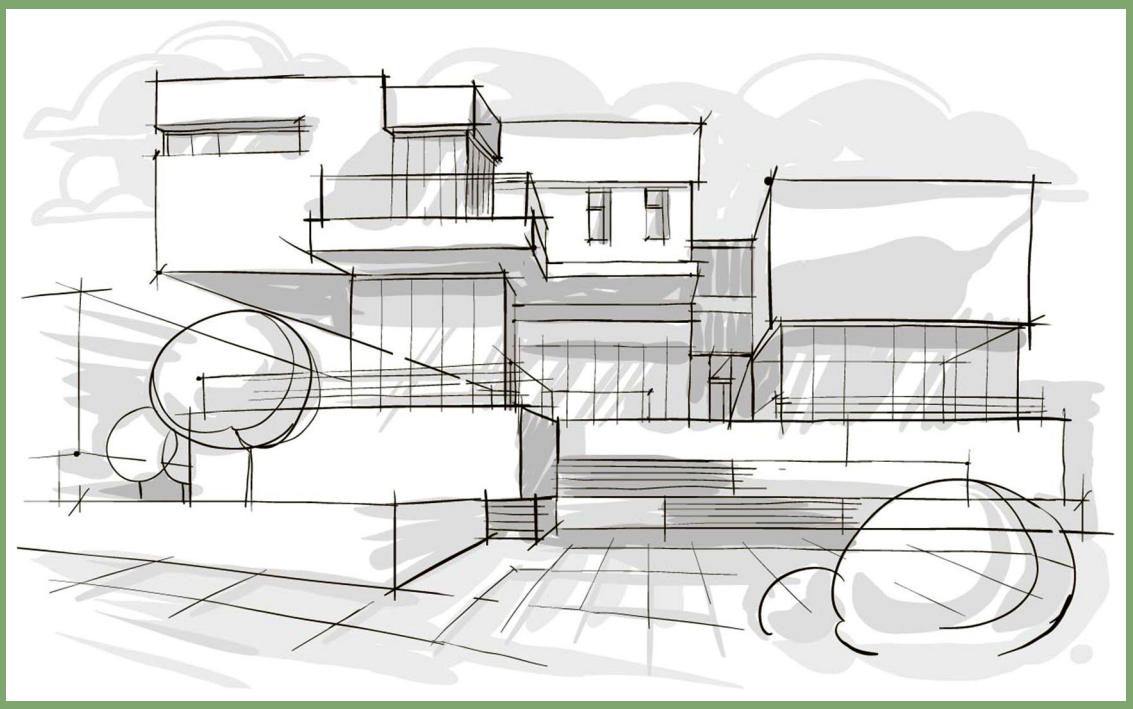
Question 11

What do you think?

51 Are there any issues or challenges that we have missed?
52 Do you agree with the proposed policy options?
53 Do you disagree with any of the options?
54 Are there any other policy options we should be considering?
55 Do you have any other comments in relation to how we can plan for heritage and cultural assets within the district?

Chapter 12

Creating high quality places through good design



What do we know?

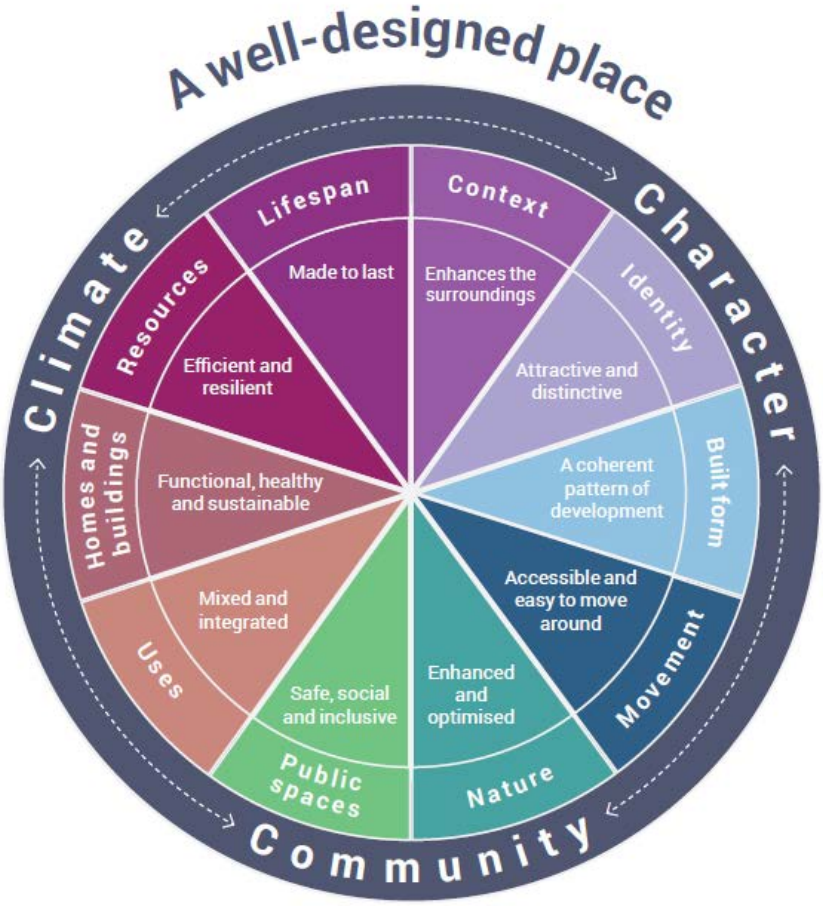


Figure 20 Sourced From The National Design Guide (2019), Ministry of Housing & Local Government

12.1 Good design creates places, buildings, and spaces that work well for everyone, look attractive, support the natural environment and wildlife; last the test of time and will adapt to the needs of future generations.

12.2 There are many different definitions of what good design means. Many of these focus on appearance but good design also incorporates how a building or place functions. The Government's National Design Guide[58] published in 2019 provides an expanded definition of a well-designed place. It incorporates ten characteristics under the three key themes of 'character', 'climate' and 'community'.

12.3 Development in Wealden has been influenced over the years by the diverse character of the natural environment and the availability of local materials. For example, in the High Weald settlements occupy the higher ground, with the main connections between them following the ridgelines, and other villages, hamlets and farmsteads in the area being linked

58 National Design Guide, (2019)

to these main roads by a complex of narrow, winding lanes. In the Low Weald the landscape is flatter and in places more wooded, with villages and settlements scattered throughout and sustained by a network of narrow country lanes. Architecturally both the High and Low Weald share similar characteristics in the use of building materials, including timber framing with wattle-and-daub infill panels; local orange/red brick, normally laid in English or Flemish bond and handmade orange/red clay plain tiles for roofs and vertical hanging, although in parts of the Low Weald course flint (both knapped and unknapped) and mathematical tiles (particularly in Uckfield) over timber framing are also used. It is these elements and more besides that contribute to the 'local distinctiveness' which helps to differentiate Wealden's character areas from those found elsewhere in the country. It is important that this distinctiveness is not diluted through new development.

12.4 The majority of Wealden's landscape, tree and wildlife heritage (including our woodlands, downlands, heathlands and wetlands) is important at International, National and regional levels; and much of the rest has value at the local level. Therefore it is important that the design of any development is sympathetically integrated into the landscape ensuring the conservation and enhancement of this heritage.

12.5 The design of development in the district is not just important to the character of the natural and built form that already exists but also in our efforts to achieve sustainable development for the future i.e. that which addresses climate change and the changing needs of our population. The design and form of new buildings should aim to, amongst other things, minimise energy and water consumption; maximise the use of recycled materials; be flexible and capable of adaptation for changing needs (i.e. as people get older) and be designed for less car dependence.

12.6 Creating high quality places though design is not a 'shopping basket' approach but requires a creative input to the process of reconciling local practices and traditions with the latest technologies, building types and needs. This will be extremely important to take forward in our Local Plan.

What are our key issues and challenges?

12.7 Creating high quality places though good design is about more than just how development looks. The themes set out within the Governments National Design Guide provide the basis for how we want to deliver high quality design in developments. We want development to look attractive and respect the context within which it is located, be that in terms of the landscape or existing built form, but we also want to create safe, sociable and healthy neighbourhoods that work for our communities; ensure that developments protect and enhance the natural environment for wildlife and people and that development fully accounts for climate change in the way it is conceived and delivered. The key issue we face is how to ensure that we achieve these aims whilst delivering the growth and development that we need.

12.8 Across the country, new development in recent years has often tended towards the use of 'standard' house and development types that do not necessarily take account of, or reflect, the local context i.e. in the layout of a site or the use of materials. This is a prominent

issue in relation to development within our historic towns and villages and particularly when it comes to development involving historic farmsteads and/or buildings, specifically extensions and changes of use. In addition, this standardised approach can sometimes mean opportunities for more innovative and creative designs that complement or add to the local character are missed.

12.9 A key challenge we face is how to facilitate the delivery of developments that respect their local context and surroundings (including historic character) without resulting in 'pastiche' development, whilst at the same time ensuring that we do not stifle innovative designs and concepts. This will be a key issue in the formulation of our policies around landscape and heritage as well as design.

12.10 We also face the challenge of how we create high quality places that are adaptable to the impacts of climate change and also help to mitigate the causes of climate change. Buildings need to be constructed in such a way that they maximise energy and water efficiency for example, but we also need to approach this challenge from an holistic viewpoint in that the layout of development; its location in relation to services and facilities and the incorporation of natural/green spaces are key in creating healthy and liveable developments for the future. Whilst this is likely to be more achievable on new developments, retrofitting existing development so that it is able to deal with the impacts of climate change poses more issues, particularly in relation to our historic buildings and Conservation Areas. Integrating renewable energy technologies and energy saving measures into historic and listed buildings, for example, can be difficult because of their visual and physical impact on the building. This will need careful consideration to ensure that relevant opportunities are taken to improve energy conservation without causing harm. Matters related to how we can design sustainable developments will be a consideration in our formulation of policies on climate change and housing as well as design.

12.11 As well as designing high quality places for people, we need to ensure that in developing our policies on design it is not just the built form and people that are catered for but also the natural environment. This will be a key issue in the formulation of our policies on the environment as well as design.

12.12 It is not only the design and layout of new development or retrofitting of existing buildings that require high quality design, the attractiveness of our public realm in town and village centres is a key issue in their appeal to residents and visitors alike. For example shopfronts have a key role in defining the visual character of our high streets and smaller shopping parades, however the introduction of features such as solid security shutters can have a deadening effect by preventing light spilling into the street at night, making an area less inviting. Similarly, advertising hoardings and freestanding adverts can have a negative impact on the appearance of a place by adding clutter to the street-scene and can be particularly intrusive in rural countryside settings. We will need to consider our policy approach to shop frontages and street furniture to ensure that our town and village centres can be attractive spaces to spend time, helping them to thrive.

12.13 The Government's White Paper consultation, 'Planning for the Future', which seeks to reform the planning system in England[59], seeks to place good design at the heart of the planning system. For the White Paper, the primary means to deliver high quality design in new buildings is through the creation of locally produced design guides and codes. It is proposed for this to be combined with a 'fast track for beauty', which means that development proposals which comply with local design guides or codes will have a positive advantage and greater certainty about their prospects of swift approval.

12.14 The White Paper also promotes master planning in 'Growth' areas and the use of 'pattern book' guides and associated permitted development rights (development that does not require planning permission) in 'Renewal' areas. This could mean that the design aspects of development are considered at a much earlier stage in the planning process with this element front loaded in plan making rather than (or perhaps as well as) being considered at the planning application stage.

12.15 The Government's White Paper also proposes that more generic design policies that are currently dealt with in a Local Plan could instead be set at the national level through a revised National Planning Policy Framework. If this proposal is taken forward, some of the design matters for our district may be dealt with through national policy in future. We will need to carefully consider, in the drafting of any new design policies, the potential implications for our Local Plan should these reforms come to fruition. The content and form of our design policies in the Local Plan may have to change in response to this.

What are we already doing?

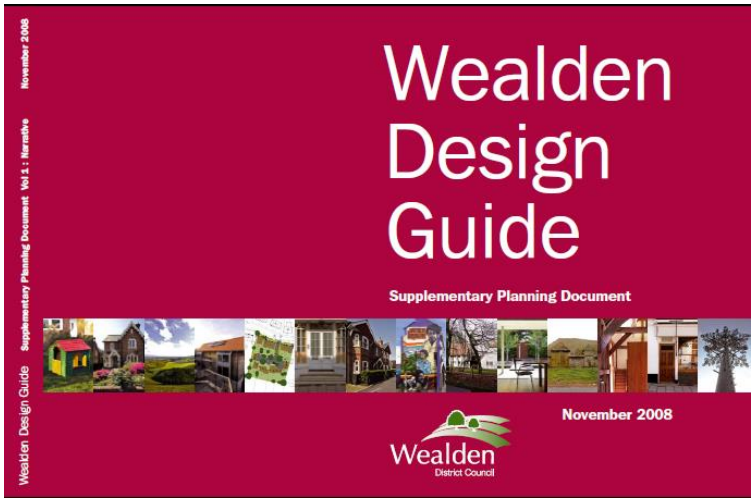
12.16 The creation of high quality places has many crossovers with other areas including housing, health and well-being, landscape and the historic environment and there are specific policies within the 1998 Local Plan for these subject areas that contribute to achieving high quality places. However, our existing policies specific to design are set out within Policy EN27 of the 1998 Local Plan. This policy sets out the design criteria that development proposals must meet including ensuring that the scale, form and layout of a development as well as the materials used and any landscaping respects the character of adjoining development and, where appropriate, promotes local distinctiveness; ensuring that the development does not adversely affect the privacy or amenity of adjoining developments or the neighbourhood and that the proposed development should ensure a satisfactory environment for the future occupants. The policy also requires that development has regard to and implements crime prevention measures wherever possible and appropriate.

12.17 A fundamental objective of our adopted Core Strategy (2013) is to encourage the development of high quality, safe and attractive living environments for communities in both towns and villages, while promoting local distinctiveness through good design in all new development. We want future built development to create spaces and places which are sustainable, distinctive and durable – being places where people want to live. Development

59 Planning White Paper, Planning For the Future, (August 2020)

will be expected to make a real contribution to addressing climate change issues and addressing the needs of our ageing population.

12.18 We also provide detailed guidance and support for design within the Wealden Design Guide Supplementary Planning Document (SPD), which covers a wide range of topic areas from landscape, trees and wildlife to designing the public realm, new residential development and shopfronts. The Design Guide is highly detailed however it shouldn't be regarded as prescriptive but rather as a reference to establish basic design principles considered appropriate for use in the district, taking account of all relevant issues relating to context and form.





Grants Hill House, Uckfield

12.19 A particular development that we are proud of within the district in regards to design is Grants Hill House, part of the Councils new retirement living scheme, which won the 2020 Housing Design Award for best completed scheme in the innovation category. The scheme in Oaklea Way, Uckfield, won the *Housing our Ageing Population Panel for Innovation Award (HAPPI)* and was judged the best entry for providing innovative housing solutions for our ageing population.

12.20 Our published and emerging draft Conservation Area Appraisals also provide detail on how development should address design in order to preserve or enhance the character and appearance of our heritage assets, including their setting. These documents help to drive up design quality in designated conservation areas.

12.21 We also recognise that our communities have an incredibly important role in helping to achieve good design. Our communities care deeply about their neighbourhoods and have detailed local knowledge about their character and the way they function. Over the last few years we have worked closely with several local groups on Neighbourhood Development Plans (NDPs) including plans for Herstmonceux, Hailsham and Hellingly which have all

successfully passed their examinations. Each of these plans has locally specific design policies. Herstmonceux's NDP has been adopted and now forms part of the development plan for the Parish, together with the saved policies of the 1998 Local Plan and the adopted Core Strategy. In order for a NDP to be formerly adopted it needs to go through a local Referendum as the last stage before adoption. Due to the outbreak of Covid-19 pandemic the Government introduced legislation that postponed all elections and referendums that would have ordinarily been held during a specified time period and so this has delayed the referendum and adoption of the Hailsham and Hellingly NDPs, these are now planned to take place in May 2021.

12.22 We are also a partner of the High Weald AONB Joint Advisory Committee which comprises representatives of the fifteen local authorities with land in the AONB and government bodies responsible for protected landscapes in England. Most recently, as part of this partnership, we have been involved in the production of the AONB Design Guide[60] which provides clear, succinct, practical and consistent advice on design expectations for new housing development within the High Weald AONB and we use this in our pre-application discussions with developers for proposals within the AONB or proposals where there may be an impact on the setting of the AONB from development adjacent to its boundary, as well as in our decision making.

What further work is needed?

12.23 Our Design Guide SPD is highly detailed and is widely and frequently used by developers and in our decision making process for all forms of development. However, it was produced in 2008 and as such we will be reviewing and updating it to reflect the substantial changes that have occurred at both the national and local level in terms of legislative changes and development that has occurred in the district since the SPDs adoption. This work will need to include consideration of the proposed changes put forward by the White Paper consultation even though there is no firm decision on them as yet.

12.24 We may also need to consider undertaking specific design work in relation to certain parts of the district in order to develop more specific design policies or indeed master planning for particular sites.

What do we have to do?

In order to support the delivery of the growth we need whilst achieving high quality places through good design, we will:

- Consider ways to encourage developments to achieve high quality in their design and use of materials so as to preserve and enhance the character of the area it is within. Higher quality buildings are more likely to be retained and adapted in the future;
- Look at how we can ensure the density of development is appropriate to, and reflective of, its surroundings;

60 http://www.highweald.org/look-after/planning/design-guide.html

- Review our existing design guidance and see where this can be updated and improved upon;
- Research into examples of good design being delivered in other parts of the country but try and focus on local examples from other authorities or developers;
- Investigate ways in which energy efficiency measures can be incorporated into developments and particularly how these can be delivered within historic areas and buildings;
- Work in partnership with our Town and Parish Councils, Neighbourhood Planning groups and other relevant bodies to ensure future planning policies protect and enhance the existing character of the district whilst allowing for innovative designs and developments to come forward that complement it;
- Support Neighbourhood Planning groups to develop design codes and/or design policies in their Neighbourhood Plans; and
- Consider how we can create sustainable development that is flexible and adaptable to a range of potential uses as well as to the impacts of climate change as the adaptation and refurbishment of existing buildings is usually less carbon intensive than demolition and rebuilding.

Direction of travel policy options.

We are considering the following policy options:

- Provide a clear vision and expectations for the design of development in the district;
- Providing policies that support high quality and inclusive design in new development and improvements to the public realm;
- Provide a criteria based planning policy to ensure scale, massing, height, details and materials in developments reflect the character, local distinctiveness, and context of the district;
- Maintain the provision of a detailed Design Guide to accompany any design policies within the Local Plan;
- Provide housing policies that will ensure new residential developments are tenure blind so that affordable housing is well integrated and has the same external appearance as private housing. This will assist in preventing segregation within developments and promote social cohesion;
- Provide policies which relate to the layout and design of sites in terms of public spaces including green spaces and open space provision. Ensure that open space standards are included in any such policies;
- Ensure that any policies on design take full account of the need to protect and enhance the natural environment and wildlife;
- Provide policies on standards for accessible and adaptable developments including allowing for homes to be capable of adaptation to meet changing needs of occupants

i.e. as they get older. This should include the adoption of minimum space standards for new residential developments in line with national standards but amended if necessary to meet local needs;

- Promote sustainable construction methods through policies;
- Provide sustainable design policies to include energy and water efficiency measures as well as the orientation of developments and greening measures including green roofs, green walls and tree planting;
- Provide policies that ensure developments are designed and delivered to enable and promote good living conditions for new and existing residents. This will support health and well-being goals as well;
- Provide planning policies for the design of the public realm including shopfronts and street furniture in town and village centres; and
- Consider the provision of area specific design policies for different areas of the district in order to better reflect the varied character of the district.

Question 12

What do you think?

56 Are there any issues or challenges that we have missed?

57 Do you agree with the proposed policy options?

58 Do you disagree with any of the options?

59 Are there any other policy options we should be considering?

60 Do you have any other comments in relation to how we can plan for high quality development through good design within the district?

Chapter 13

Help our communities to thrive, living safe, inclusive and healthy lives



What do we know?

13.1 The environment in which people live has a profound impact on health and well-being. In addition to direct health benefits, enhancement of the built and natural environment can have an impact on people's attitudes, behaviours and perceptions of their environment. For instance, reducing air pollution can improve perceptions of safety and promote outdoor physical activity and social interaction. The linkages between health and the built and natural environment have long been established and the role of the environment in shaping the social, economic and environmental circumstances that determine health is increasingly recognised and understood.

13.2 Public Health England set out in their document 'Spatial Planning for Health' [61] that numerous aspects of the built environment and health are related.



Figure 21 Life expectancy at birth 2017 -2019

13.3 However, it is important to recognise that the causal links between built environment and health are often complex, in that they are influenced by numerous, and often conflicting, factors including the age profile of a population, relative deprivation, activity levels and access to healthcare.

61 Public Health England (June 2017) Spatial Planning for Health: An evidence resource for planning and designing healthier places https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf

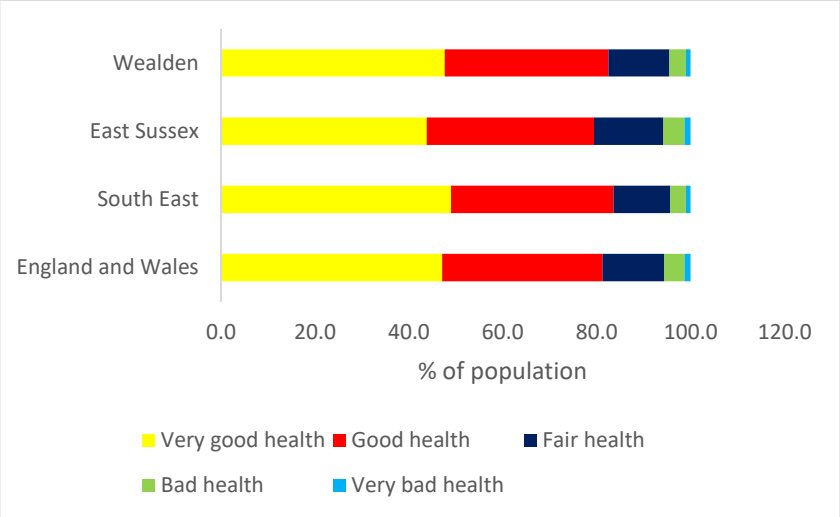


Figure 22 General health in 2011

13.4 Currently the Council seeks to maintain and improve the health and well-being of the population through our work in housing, environmental health, planning, leisure, economic development and other services. When looking at the general health of Wealden residents, we are fortunate in performing well on many health and well-being indices when compared to national averages[62][63][64][65].

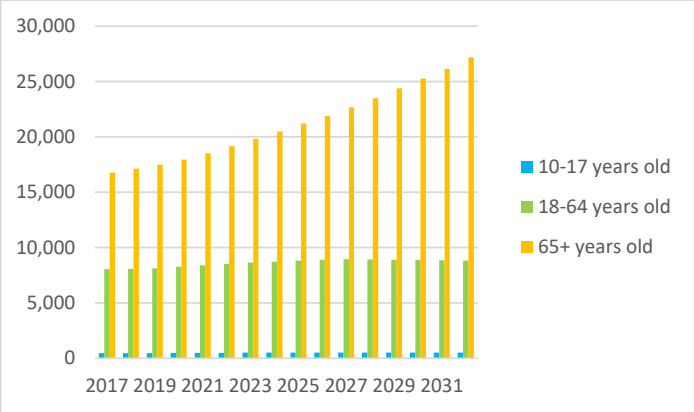


Figure 23 Disability projections (dwelling-led), 2017 - 2032 - districts

13.5 Although life expectancy and overall health reporting are very good for the district, there is a proportion of residents living with one or more disability. The largest increase will

62 Wealden District Needs and Assets Profile (2017), East Sussex County Council
63 Office for National Statistics. Life expectancy at birth by gender, 1991-2018 – districts. Available at: www.eastsussexinfigures.org.uk
64 General Health in 2011 – super output areas. Available at: www.eastsussexinfigures.org.uk
65 East Sussex County Council Research Team (May 2019) Disability projections (dwelling-led), 2017-2032 - districts. Available at: www.eastsussexinfigures.org.uk

be within the 65+ age group, with a rise of 38.3% by 2032. There will also be a relatively significant rise in the 10-17 age group of 12.5% by 2032 and 8.6% in the 18-64 age group.

13.6 It is worth noting that, according to the Joint Strategic Needs & Asset Assessment (JSNAA), accessibility varies across the district. For example in Hailsham and Polegate 84% of households can get to a GP practice within 15 minutes using public transport or walking, whereas in Uckfield this figure is 53% and in Crowborough this figure is 60%[66]. In many of our rural communities residents would need significantly longer than 15 minutes, or the use of a private car.

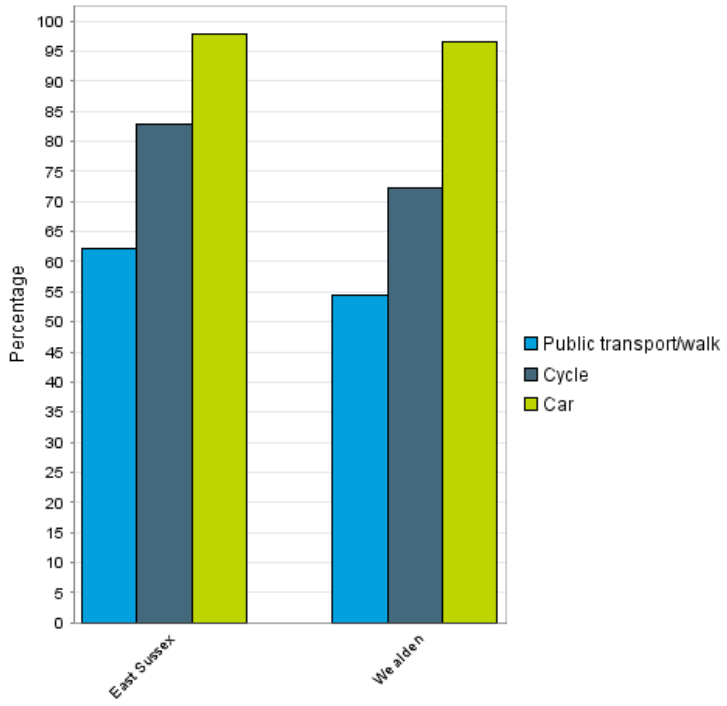


Figure 24 Access to GPs 2017 - super output areas

13.7 However, as highlighted in the Health and Well-being Strategy (2017-2020)[67], two of the biggest threats to public health in Wealden, and East Sussex as a whole (aside from smoking), are levels of obesity and physical inactivity. To add to this, we have an increasing proportion of older people within the district which brings with it a series of additional needs.

13.8 In 2018/19, the percentage of reception aged children (4-5 years old) that were considered to be overweight was 12.3% and 8% were considered to be obese, including being severely obese[68]. Of those children in Year 6 (10-11 years old), 11.4% were considered to be overweight in 2018/19 with 15% being considered obese, including severely obese. Despite these figures, the district has the lowest percentage of year 6 children who are overweight or obese in the County, significantly lower than the East Sussex average[69].

13.9 Levels of adult obesity within the district are higher than the national average with the Joint Strategic Needs and Assets Assessment (JSNAA) latest data showing that in 2015, 63.5% of the adult population within Wealden were considered to be overweight or obese.

66 Scorecard 2.13 Percentage of households that can access a GP practice within 15 minutes using public transport/walking, 2014 (modelled). Available at: http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2018/NHSView2WiderDeterminantsMarch2018.pdf

67 Healthy Wealden – A Health and Wellbeing Strategy 2017-2020. https://www.wealden.gov.uk/UploadedFiles/Healthy_Wealden_Strategy_2017-2020.pdf

68 Public Health England. NCMP and Child Obesity Profile (2018/19). Available at: https://fingertips.phe.org.uk/profile/national-child-measurement-programme/data#page/1/gid/8000011/pat/6/par/E12000008/ati/101/are/E07000065/iid/90316/age/200/sex/4/cid/4/page-options/car-do-0_ovw-tdo-0

69 Area Summary for Wealden District (March 2018) http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2018/Area%20Summaries/LA%20View/LA-Area-Summary---Wealden-2018.pdf

13.10 Data shows that in 2016/17 only 2.9% of the adult population in the district cycled at least 5 times a week, whereas 30.7% walked for at least 10 mins five times a week[70]. However, the proportions undertaking walking for leisure in the district are significantly higher than the national, regional and local averages, which could indicate Wealden's attractiveness for walking and is an encouraging trend. By contrast, cycling is relatively low overall, perhaps reflecting issues with safety on our roads or the lack of cycle infrastructure within the district. The Active Lives Survey East Sussex shows that in 2018-19 just over 62% of the adult population in Wealden (those aged 16 years +) were active and undertook 150 mins or more of physical activity per week. The data also shows that 26% of the adult population in Wealden were inactive, undertaking less than 30 mins of physical activity per week[71].

13.11 In terms of crime, Wealden remains one of the safest districts in East Sussex with an overall crime rate of 40.1 crimes per 1,000 population in 2017/18. This is the best out of the 5 East Sussex districts for the 2017/18 period. Whilst this does represent an increase from 26.4 in the 2013/14 period, the rate is still far lower than the average for the South East region[72].

13.12 The age structure of the district shows a significant proportion of the population are over 65 years old and that this proportion is projected to increase over the next 13 years. The Census in 2011 shows that we have a significantly higher percentage of people over 65 years old when compared to the national and regional picture. Whilst the district will see a fall in the proportion of the population in the younger age groups, overall the picture is one where the majority of the population are aged 18-64. The fact that we have a high (relative to the national and regional picture) and growing proportion of over 65's in the district indicates that Wealden is an attractive place to live for older people, whilst the relative affluence can mean it is difficult for younger people to move in or stay[73].

70 Department for Transport. Walking and cycling, 2010-2017 – districts. Available at: www.eastsussexinfigures.org.uk
71 https://www.activesussex.org/funding-insight/insight/active-lives-survey-sussex/
72 Ipsos MORI for East Sussex County Council. Available at: www.eastsussexinfigures.org.uk
73 ESCC (April 2020) Population projections by age and gender (dwelling-led), 2018-2033 – districts. Available at: www.eatsussexinfigures.org.uk

13.13 The age structure of the district shows a significant proportion of the population are over 65 years old and that this proportion is projected to increase over the next 13 years. The Census in 2011 shows that we have a significantly higher percentage of people over 65 years old when compared to the national and regional picture. Whilst the district will see a fall in the proportion of the population in the younger age groups, overall the picture is one where the majority of the population are aged 18-64. The fact that we have a high (relative to the national and regional picture) and growing proportion of over 65's in the district indicates that Wealden is an attractive place to live for older people, whilst the relative affluence can mean it is difficult for younger people to move in or stay[74].

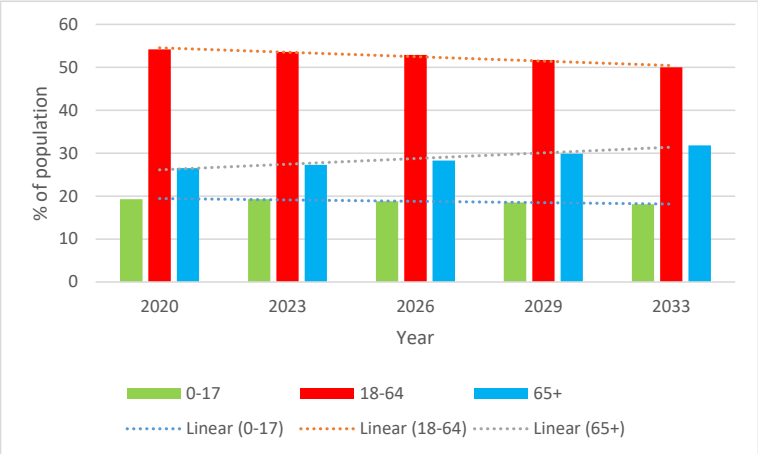


Figure 25 Population projections by age in Wealden

13.14 In terms of sport/leisure provision within the district, Freedom Leisure operates four centres in Crowborough, Hailsham, Heathfield and Uckfield. On average, just under 1.1m people per annum visit the four centres, with the centre at Hailsham being the most used and the centre in Heathfield being least used. The centres at Uckfield and Heathfield are 'dual-use' sites meaning they are used by the colleges and community, with limited public access of some areas during term time..

13.15 Some of the larger independent schools in the district have very impressive built sports facilities. Whilst these can sometimes be available for outside use by clubs and organisations, their primary function is to meet the needs of the school, and they are used for that purpose for long hours throughout the week. In addition there are a growing number of private gyms and sports clubs across the district.

13.16 The household survey conducted as part of the Wealden Indoor Built Sports Facility Needs Assessment (2016) highlighted that Sport and Leisure Centres are used regularly by significant numbers. The survey indicated that the majority of respondents used sports halls and swimming pools on a regular basis, and roughly 60-70% indicated that they were prepared to travel up to around 15 minutes to use such facilities, and the most popular mode being by car. The assessment found that provision of new or redeveloped leisure centres was going to be most needed within the south of the district in the Hailsham and Polegate areas.

74 ESCC (April 2020) Population projections by age and gender (dwelling-led), 2018-2033 – districts. Available at: www.eatsussexinfigures.org.uk

13.17 As part of the Wealden Open Space Study (2017) community consultation revealed that in the main the majority of households thought that there were enough open spaces and outdoor sport facilities, however there were three open space typologies where the majority of respondents suggested there is a general need for more – facilities for teenagers, natural green spaces (wildlife areas, nature reserves etc.) and informal open spaces (for ball games, picnics, hobbies, dog walking etc.)

13.18 The community consultation also revealed that over a third of households rated the quality of Multi Use Games Areas (MUGAs) as poor or worse but that between 50%-60% of respondents highly rated the quality of country parks, natural green spaces, footpaths, bridleways, cycle paths, parks and recreation grounds. This highlights the importance residents place on these types of open space.

13.19 In terms of access, the Study found that at least 50% of households are willing to travel 16 minutes or more to visit country parks, natural green spaces, outdoor bowling greens, artificial turf pitches and water recreation facilities. However, a significant number of respondents felt facilities such as play areas, allotments and informal open spaces needed to be much more locally accessible. The Study also found that there is a deficiency of at least one type of open space in each Parish in the district. There are also accessibility and quality deficiencies where either additional provision could be provided or existing facilities could be improved.

13.20 The district also has:

- 900 square meters of water space in community use;
- The equivalent of 40 courts within sports halls that are available for some level of community use; and
- 226 out of 504 health and fitness stations that are easily available for community use on a pay and play basis at public centres

13.21 Consistent with the relatively high levels of affluence enjoyed by local residents, rates of regular participation in sport and active recreation are generally higher, and often significantly higher in the district than the national averages. However, this can mask significant differences between different parts of the district and the Council's Playing Pitch and Outdoor Sports Needs Assessment (2018) identified some level of deficiency in either quantity or quality, or both, of sports and playing pitches throughout the district.

What are our issues and challenges?

13.22 Creating healthy, thriving and inclusive communities through development is about more than just providing housing, employment and recreational opportunities. It is about designing places that work for people and enable them to make healthy choices whilst also creating a sense of community and inclusivity. We want development in Wealden to create safe, sociable and healthy neighbourhoods that work for our communities, both new and existing. The key issue we face is how to ensure that we achieve this whilst delivering the growth and development that we need.

13.23 We have already touched on the issue of housing in Chapter four, however it is worth noting here that in terms of health and wellbeing we need to ensure the types of housing that we deliver are fit for the changing needs of our population, that is that we have an ageing population that is going to continue to increase and homes need to take this into account in terms of their design and construction i.e. ensuring they are adaptable or have the means to be adapted in the future for things such as stair lifts for example. In addition, we also face the issue of increases in disabilities and illnesses associated with, but not exclusive, to an ageing population. This can include mental (i.e. dementia) as well as physical illnesses/disabilities. A key challenge here is how to achieve developments that deliver on not only the tenure of housing (i.e. affordable, market) but also the needs of the District's population now and in the future. This includes making sure there is a sufficient amount of specialist older persons housing (e.g. sheltered housing, extra care, residential care homes) to meet the diverse needs of our older residents.

13.24 Another key issue we face is that being a large predominantly rural district, much of the population rely on the private car to access services and facilities, including green and open spaces. Encouraging people to take more active travel i.e. walking, cycling and using public transport, will not only help in facilitating increases in physical activity but will also improve health through reducing air pollution and improving air quality. In order to achieve more active travel we will need to create walkable neighbourhoods and encourage mixed use developments so that services and facilities, including green spaces, are within easy reach of people using alternative modes of transport i.e. walking and cycling.

13.25 As outlined in Public Health England's document 'Spatial Planning for Health' the food environment can have a significant impact on health and well-being. This not only relates to having access to healthy and affordable food in supermarkets but also relates to the planning of food outlets such as takeaways and the accessibility of urban food growing facilities such as allotments. We will need to tackle this issue in the way we plan for our town and village centres in terms of the types of uses we look to support and encourage and may need to consider matters such as not locating a fast food takeaway close to a school for example.

13.26 Another aspect of health and well-being is the issue of social isolation and loneliness. This is an issue for us now and one that may be exacerbated by our increasingly ageing population and an increasing number of single person households in the over 65 age group. More recently, the measures to tackle Covid-19 are likely to have increased the feelings of loneliness and isolation even more, and not just amongst the older generation.

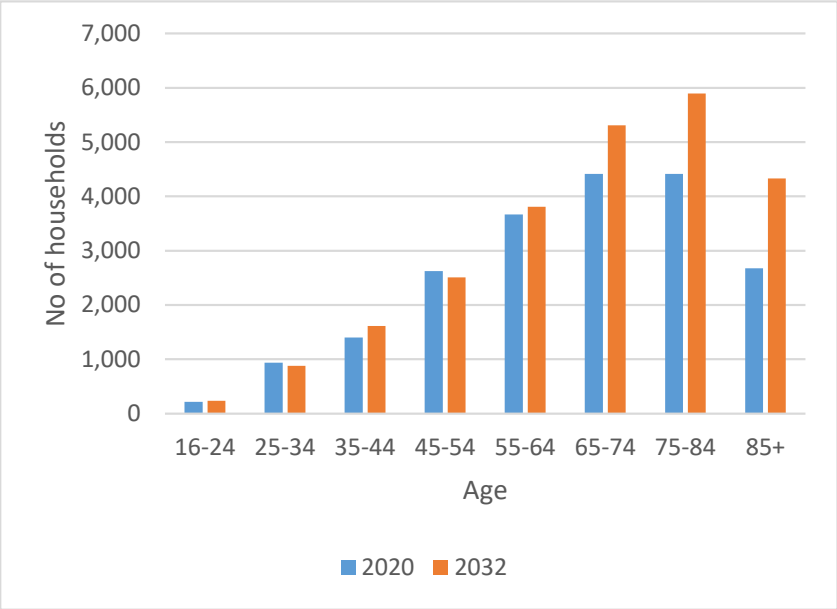


Figure 26 Number of single person households in Wealden

13.27 Obesity within the district is a key issue, particularly amongst adults. We will need to work in collaboration with other partners in the health and well-being sphere to address this issue but ensuring development incorporates accessible open space, suitable walking and cycling infrastructure and the provision of sports and leisure facilities will assist in addressing obesity levels within the district.

13.28 The level of cycling being undertaken within the district is low. This could represent issues with the provision of cycling infrastructure within the district as well as the perceived safety of cycling i.e. on the roads, lack of cycle paths. A challenge for us will be ensuring that as part of any development, cycling and walking infrastructure is embedded within the design and offers connectivity to the wider area in order to encourage people to take these alternative means of travel. This will not only improve health and well-being for individuals but also offer environmental benefits too.

13.29 As well as the direct impact of development on the health and well-being of communities i.e. types of housing, connectivity, services and facilities, ensuring developments are fit for the future impacts of climate change is also an issue we need to address. Climate change impacts such as increasing temperatures and extreme rainfall events will affect people's health and well-being and we will need to ensure that measures such as urban greening in the form of tree planting and green roofs/walls are brought forward.

What are we doing?

13.30 The creation of safe, healthy and thriving communities through development has many crossovers with other areas including housing; landscape; social care provision and design and there are specific policies within the 1998 Local Plan for these subject areas that contribute to achieving health and well-being outcomes. However, our existing policy framework

for health and well-being focuses on leisure and recreation, with the strategy in the 1998 Local Pan recognising the important contribution that recreation can make both to an individual's health and sense of well-being, and to the general quality of life enjoyed by those living and working in the district. Our policies relate to the provision of outdoor play space (Policy LR1); the protection of existing recreational open space (Policy LR2); children's play space in developments of 30+ dwellings (Policy LR3); informal amenity space in new developments (Policy LR5); indoor sports facilities (Policy LR7) and community halls (Policy LR8). All of the policies seek to resist the loss of existing outdoor/open spaces and provide new spaces under specific circumstances.

13.31 A fundamental objective of our adopted Core Strategy (2013)[75] is to seek to reduce inequalities and imbalance in the District's population by addressing problems and creating opportunities for a better quality of life, for example through improved education, health, leisure and recreation. The Core Strategy acknowledges that partnership working, particularly with the Local Strategic Partnership, is essential in order to address issues of deprivation and inequalities, to address health issues, education provision and community welfare. We commit, through the Core Strategy, to improving human health through increased accessibility to and provision of open space, leisure and recreational facilities and provide strong policy support for this through our green infrastructure policy (Policy WCS13) and the provision of infrastructure (Policy WCS7).

13.32 We also provide for the health and well-being of our communities through the Council's Corporate Plan (2019-2023) which contains a number of aims and objectives that are related to health and well-being including promoting a better quality of life for the districts residents through activities that improve health, resilience and well-being and providing for social care including supporting initiatives to address changing health needs across the District, with work on dementia and social isolation as well as seeking to meet local needs in the housing market including for those older people seeking to downsize. In terms of health and well-being, the Corporate Plan's priorities lie with wanting local communities to have the opportunity to enjoy an excellent quality of life through:

- Active, healthy and fulfilling lifestyles;
- Access to good health care;
- Safe environments for all ages;
- Thriving community clubs, sport, recreation and leisure; and
- Good housing local people can afford, in places they want to live

13.33 We also have the 'Healthy Wealden – A Health and Wellbeing Strategy (2017-2020)[76] that was published in the autumn of 2017 and identifies that both physical and mental health and well-being are key priorities for the district given the rapidly growing and ageing population, and the associated challenges of independent living, rural isolation, and accessibility. The Strategy highlights the significant role that the Council has in delivering the

75 Wealden Core Strategy (2013) https://www.wealden.gov.uk/UploadedFiles/Adopted_Core_Strategy_2013_for_web.pdf
76 https://www.wealden.gov.uk/UploadedFiles/Healthy_Wealden_Strategy_2017-2020.pdf

public health agenda with three broad priority health and well-being themes recognised for our residents:

- Reducing obesity levels;
- Increasing physical activity levels; and
- An increasingly ageing population creating a series of additional needs

13.34 There are also a number of other strategies which are, and will be, integral to our planning for healthy and thriving communities. The Wealden Older Persons Housing and Support Strategy 2008-2028 has been produced in partnership with East Sussex County Council and a number of other key stakeholders to specifically address issues relating to older persons housing and support with the aim being to enhance the social inclusion, dignity, choice and independence of older people living in Wealden District Council, by supporting people to stay in their own homes and through the provision of a range of housing and housing related support services.

13.35 The Intergenerational Strategy will look into how the Council services, infrastructure, housing, technology and communities will need to evolve in order to continue meeting the demands of Wealden's residents and looks in more detail at a number of 'age friendly' policies and best practice examples. This report will be published later this year.

13.36 Other strategies and work that will have a bearing on the health and well-being of the district's population include the Housing Strategy 2017-2020; the Homelessness Strategy 2018-2023; the Wealden Older Persons Housing and Support Strategy 2008-2028 as well as strategies concerning the economy, open space and recreation.

13.37 We have also delivered two new parks near Crowborough (Walshes Park) and Uckfield (Horsted Green Park) in recent years. These parks provide new recreational space for our residents while also helping to protect the Ashdown Forest from further damage. The parks create health and wellbeing benefits but also environmental benefits for our protected sites and are paid for by developer contributions. The parks are examples of planning acting as a force for positive change to ensure that new development helps to meet long term social and environmental goals within the district.



Walshes Park SANG, Crowborough

13.38 More recently we have launched a new 'Healthy Wealden' website[77]which provides a directory of our open spaces. This was devised specifically to publicise our open spaces and help people locate them easily and to help our residents gain physical, health and mental well-being benefits.

What further work is needed?

13.39 In terms of addressing the relationship between open space/green space provision and the health and well-being of our communities, we have a detailed understanding of the current state of provision within the district, including quantity, quality and accessibility through the Open Space Study (2017) and the Green Infrastructure Study (2017). However, we would like to build on our existing evidence base and will be developing a Green Infrastructure Strategy which will have an influence on health and well-being but more importantly, and relevant, we will be commissioning further work on open space and sports pitch provision across Wealden to understand not only what facilities we have but crucially to understand areas of deficiency. This work will provide evidence of the type and amount of open space we need new developments to provide and also give us a robust and up-to-date evidence base to develop our policies which will ensure places for children to play, recreational space for young people to enjoy and important green spaces that help with our resident's health and well-being are delivered in the right places and to the right standards.

13.40 The planning concepts put forward in Public Health England's Spatial Planning for Health will help us to create healthy, safe and thriving communities through development. We will need to undertake work in relation to areas including food production (looking at the demand for allotments and community gardens for example); the provision of a comprehensive cycle and walking environment/infrastructure (through work on the East Sussex Local Cycling & Walking Infrastructure Plan); national and local strategies to address obesity, inactivity and general health and fitness; national and local strategies to address issues around the ageing population (linked to housing and loneliness matters for example) and other public health related work that may be connected to, or can be addressed through, spatial planning. Much of this work is likely to have crossovers with other policy areas such as housing, infrastructure, green infrastructure and design (covered in other chapters).

What do we have to do?

13.41 In order to support the delivery of the growth we need whilst ensuring we create healthy, safe and thriving communities, we will:

- Work closely and collaboratively with East Sussex County Council; our Clinical Commissioning Groups; Town and Parish Councils; Public Health colleagues; our Housing Team and our Community and Regeneration Team to ensure linkages between our planning policies and wider health and wellbeing strategies / initiatives are identified, implemented and maintained. This includes but is not limited to strategies to tackle obesity; rural isolation and loneliness; local and healthy food production and walkable neighbourhoods;

77 https://www.healthywealden.co.uk/

- Consider the concepts put forward in Public Health England's 'Spatial Planning for Health' document and how we may be able to take these forward in our Local Plan policies or as supporting planning documents / strategies. We may need to commission additional work in these areas;
- Consider ways to ensure new developments incorporate green / open spaces and green infrastructure at the outset of a schemes conception;
- Consider ways in which we may be able to facilitate a comprehensive walking and cycling network;
- Ensure that green spaces are connected and accessible to assist in the provision of walking and cycling routes.

Direction of travel policy options.

We are considering the following policy options:

- Provide policies setting out the location, quantity and quality standards new development is expected to deliver in terms of open space, sport and recreation facilities;
- Continue to protect and resist the inappropriate loss of open space, sport and recreation facilities;
- Ensure the location of new housing development (including site allocations) is situated on land and in areas accessible to employment, services & facilities (including healthcare and community), public transport, open space, walking and cycling routes in order to create walkable neighbourhoods;
- Provide policies that support and encourage active travel choices including walking, cycling and public transport. Ensure that distances needed to travel to access recreational facilities and open space are minimal and that access to these is possible via walking and/or cycling;
- Provide policies to support public realm improvements including but not limited to appropriate street lighting, signage and street legibility;
- Ensure that new development is designed to reduce the risk of crime.
- Provide policies that support and encourage local and sustainable food production (i.e. allotments, community gardens);
- Provide policies that provide the appropriate housing mix for the district, informed by the evidence base, and ensure that policies support the provision of housing that accounts for the changing age profile of the district, ensuring suitable housing adaptability where possible.;
- Consider opportunities to design in safe and accessible walking and cycling networks to developments. This could then help support and encourage the proportion of residents who walk and cycle in the District. This could have beneficial impacts on health, obesity, reducing emissions and sustainable transport;

- Provide policies to support and encourage mixed use developments. The blending of homes with shops, employment and civic building brings well-known health benefits to residents by encouraging walking, and corresponding benefits to the environment by removing the need to drive;
- Ensure that development, particularly housing development, is made healthy through the provision of good quality green / open spaces and greening measures within their design and layout; and
- Noise management policies should be considered for the district particularly given its rural nature as this can affect health and well-being.
- To protect existing social and community facilities so people have a places to meet and socialise.
- To promote new social and community facilities as part of residential or other mixed use development schemes where appropriate.

Question 13

What do you think?

61 Are there any issues or challenges that we have missed?
62 Do you agree with the proposed policy options?
63 Do you disagree with any of the options?
64 Are there any other policy options we should be considering?
65 Do you have any other comments in relation to how we can plan for health and wellbeing within the district?

Chapter 14

Our Growth Options



Strategic Growth Options

14.1 The new Local Plan will set out a long term vision for the district and sets out objectives and a spatial strategy, to provide a framework for delivering development in the district for the next 20 years or so. A key consideration for the Local Plan will be the spatial distribution of new development within the district, particularly housing and economic development to meet needs and there are four broad options presented below to meet those requirements. Although there are four possible options presented within this consultation document, it could be that a combination of several of these options presented will form the final preferred strategy to meet identified growth within the new Local Plan.

14.2 Through the existing Wealden District Core Strategy Local Plan, as well as extant planning permissions, an existing supply of both business development and housing sites have been confirmed, which will contribute to achieving some of Wealden's development needs in the future. However, as recognised elsewhere in this document, we will require further significant growth to accommodate all our requirements.

14.3 At this stage, these growth options are not about specific sites or locations of where new growth should take place, but at the highest level the options for how the district may develop – should we seek to deliver all the growth in one or more strategic locations, should we spread the growth to all corners of the District, or somewhere in between.

14.4 It should be noted that the following options are presented in no particular order.

Option 1 – Focused Growth including Large Extensions to Existing Sustainable Settlements

14.5 This option would be to focus on growth for existing sustainable settlements, similar to the approach taken in the Core Strategy Local Plan (2013).

14.6 For this option, our most sustainable settlements (possibly including those very close to the border) would deliver the vast majority of the growth in the district. A smaller proportion of growth would then go to other sustainable rural settlements within the district, including larger villages with sustainability credentials. There would only be very limited growth in smaller villages and rural areas.

Key Implications for this Approach

- Accepting further development in some locations would involve substantial developments within the High Weald AONB that would need to be justified through national planning policy;
- Accepting further development within South Wealden will likely necessitate a need to deliver substantial highway infrastructure improvements to the A27 and A22 that requires substantial government investment that is not yet committed;
- Limited development within the villages and rural areas of Wealden may be a missed opportunity to make best use of development potential in these locations, where we may otherwise allow villages to grow in a sustainable way;

- This option would focus development on the most sustainable locations in the district with access to local shopping services, education, leisure and recreational facilities;
- This option would ensure more access for public transport and an opportunity to enhance those public transport opportunities as a result of further growth;
- Possible opportunities for higher densities in urban areas and town centre locations, especially where there is good access to public transport, services and jobs;
- This option provides limited opportunities to provide affordable housing within rural areas and/or the High Weald AONB, where affordability issues are most acute;
- Wealden has a limited selection of brownfield sites and where they have been available, many have previously been granted planning permission for new housing development. Therefore, the district has a limited supply of additional brownfield sites, particularly in settlements that have been the focus of growth for a number of years; and
- This option would reduce the potential impact of development pressure on other more rural parts of the district.

Option 2 – Semi-Dispersed Growth to Existing Sustainable Settlements and Larger Villages

14.7 This option would distribute growth across the district to sustainable settlements, with the majority of development still being located within the most sustainable settlements as listed in option one (subject to further settlement hierarchy work), but with a larger proportion of growth being earmarked for other sustainable settlements within the district, such as larger villages within the district that have sustainability credentials (this will be updated as part of the Council's settlement hierarchy work). There would continue to be only limited growth within smaller villages and rural areas.

Key Implications for this Approach

- Accepting further development in some locations would involve substantial development in the High Weald AONB that would need to be justified through national planning policy;
- Accepting further development within South Wealden will likely necessitate a need to deliver substantial highway infrastructure improvements to the A27 and A22 that requires substantial government investment that is not yet committed;
- This option would still lead to more limited development within smaller villages and rural areas, and may not support their sustainable growth;
- This option would focus development on the most sustainable locations in the district with access to local services;
- There would be more access for public transport opportunities and opportunity to enhance those public transport opportunities as a result of further growth;
- Some larger villages are not well served by public transport, which may result increased reliance on car use;

- This option still provides limited opportunities to provide affordable housing within rural areas and/or the High Weald AONB, where affordability issues are most acute, albeit it would be an improvement over option 1 in this respect;
- This option may provide potential to enhance the sustainability of larger rural settlements through new housing development (and additional population) supporting local services/facilities and enhanced public transport;
- Possible opportunities for higher densities in urban areas and town centre locations, especially where there is good access to public transport, services and jobs; and
- This option would present the opportunity for larger villages to support local services and contribute to the viability of the rural economy.

Option 3 – Dispersed Growth

14.8 This option would be to provide for development in all settlements across the district in line with an updated settlement hierarchy that assesses the sustainability credentials of all settlements in the district. The amount of new development would be proportionate to the size of each settlement (and its position within the settlement hierarchy) as well as its existing services/facilities and the ability to enhance those facilities. This would be the only option where some growth within smaller villages and rural areas would be supported subject site specific constraints and the settlement's position within the settlement hierarchy.

Key Implications for this Approach

- Accepting further development in some locations would involve substantial development in the High Weald AONB that would need to be justified through national planning policy;
- Accepting further development within South Wealden will likely necessitate a need to deliver substantial highway infrastructure improvements to the A27 and A22 that requires substantial government investment that is not yet committed;
- This option may provide new homes in locations that are relatively remote from a comprehensive range of services and facilities;
- This option would present opportunities for all villages to support local services and contribute to the viability of the rural economy;
- This option may provide potential to enhance the sustainability of larger rural settlements through new housing development (and additional population) supporting local services/facilities and enhanced public transport;
- In contrast, the scale of development in some smaller villages/rural areas may not be sufficient to ensure services are viable, or improved public transports facilities;
- This option would improve the delivery of new affordable homes within rural parts of the district, including the High Weald AONB, where affordability issues are most acute;
- This option would improve the delivery of housing generally within rural areas; and
- This option would provide housing delivery in locations that are not well served by public transport with a resulting increased reliance on car usage.

Option 4 – New Settlement(s) Growth

14.9 This option would in effect include a 'new' freestanding settlement(s), potentially in the form of one or more 'Garden Village'. Depending on the final location, this option could also include the very significant expansion of an existing settlement(s).

14.10 This option would be based on a potential settlement or settlements of around 2,000 to 5,000 homes plus other business, employment, community and leisure uses. The proposed settlement would include an agreed set of design principles and would be led through a unique master plan that would form part of the Local Plan.

Key Implications for this Approach

- It is reliant on identifying a satisfactory sustainable location for a new settlement and a willing developer to bring forward the site on a holistic basis;
- There would be potential to plan the site through the Local Plan process, including design codes and comprehensive master planning, including the provision of transport infrastructure, community facilities, commercial uses etc;
- Consideration of other developments within the district would still be required given the scale of development requirements in the district, particularly in the short to medium term, as the new settlement will take some time to deliver;
- The delivery timescales of such a strategic development would mean that its contribution would likely not be achieved until the second half of the Local Plan period and would not help the Council with its housing shortfall in early part of the Local Plan;
- There may be potential impacts on national and/or international environmental constraints depending on the specific location pursued through this option;
- The infrastructure requirements will be considerable and may have implications for timely delivery (i.e. unexpected delays), which may require other housing developments in other locations of the district to be brought forward sooner to meet housing needs at that time;
- This approach may enable the local authority to capture more affordable housing from a development such as this;
- There would be greater scope for a mix of uses within this development though this will be dependent on the location of the settlement;
- The site would largely be greenfield and would therefore require a significant land take in open countryside. This would reduce the amount of brownfield land brought forward for housing development within the Local Plan;
- It is very unlikely that rail services would be connected to a 'new settlement' given the existing location of rail services in the district and the cost for the relocation/establishment of a new rail station within/nearby to the new settlement;
- In general, transport infrastructure in some areas of district may not be adequate or deliverable to support development of this scale;
- There is a significant opportunity to provide a high quality development, of a good design with more community engagement;

- This option provides limited opportunities to provide affordable housing within rural areas and/or the High Weald AONB, where affordability issues are most acute; and
- This option would reduce the potential impact of development pressure on other more rural parts of the district.

Question 14

What do you think?

66 Are there any spatial distribution options that we have missed?

67 What is your preferred option or combination of options in order of preference?

68 Do you disagree with any of the options presented?

69 What views do you have about the possibility of a new settlement somewhere in the district to provide a large proportion of development needs?

70 Where do you think a possible new settlement could be located and why?

Published by
Wealden District Council
Council Offices
Vicarage Lane
Hailsham
East Sussex BN27 2AX
Tel: 01323 443322
Fax: 01323 443333
e-mail: planningpolicy@wealden.gov.uk
Website: www.wealden.gov.uk