

# Chapter 11

## Economy



## Introduction

**11.1** This chapter sets out the strategy for the local economy in Wealden. There have been several events/trends that have changed the role of the economy in recent years, including the rise of internet shopping and the associated requirement for warehouse and distribution uses, the recent Covid-19 pandemic and its impact on the ways people work (i.e. homeworking) and on tourism uses specifically, that have declined considerably during that period. There has also been the relaxation of planning regulations, with ‘main town centre uses’ (such as offices) being able to change to other uses without planning permission, including the introduction of residential uses. Conversely, our evidence shows that demand for industrial property has been (and will continue to be) extremely high and is not matched by supply.

**11.2** Another key issue is where this employment floorspace can be accommodated within the district, given that many of Wealden’s existing industrial estates are older/outdated and situated within the main towns and villages of the district with limited room to intensify and/or expand. National planning policy does not specify exactly where employment development should go, with the exception of ‘offices’ that are considered ‘main town centre uses’ and are therefore directed towards town centres first. However, it notes that local planning policies should recognise and address the specific locational requirements of different sectors, such as storage and distribution uses being in suitably accessible locations (i.e. on trunk roads). National planning policy also supports a prosperous rural economy subject to constraints. This Local Plan will support employment in all areas subject to their accessibility and type and provides both specific employment allocations and criteria for employment land in both urban and rural areas.

**11.3** The other key issue is tourism uses and this has been significantly impacted by the Covid-19 pandemic and the loss of trade during this period that has forced tourist facilities and visitor accommodation to close. A key aim of the Wealden Economic Development Strategy (2023) is to develop Wealden as a visitor destination within East Sussex and to increase tourism spend year on year. It is evident from the Wealden Visitor Accommodation Study (2024) that the district needs to retain its visitor accommodation during the plan period (for all accommodation types). There are concerns that some visitor accommodation types (specifically caravan sites) are being converted to permanent homes that are of poor quality and would negatively impact the level of visitor accommodation needed to support the tourism industry. The Council wishes to support the tourism industry in Wealden and will seek to safeguard visitor accommodation and support the expansion of tourist attractions/visitor accommodation in sustainable locations.

## What have you previously told us?

**11.4** The Council previously consulted on a Direction of Travel document<sup>181</sup> in support of the emerging Wealden Local Plan and this had two chapters that are relevant to the economy, which includes the Local Economy and Tourism. The feedback provided on these issues is outlined below.

## Local Economy

**11.5** As part of the Direction of Travel consultation, you raised with us the importance of considering climate change and sustainability when planning for the economy, including opportunities for renewables, green space, biodiversity and tree planting to be incorporated into new employment developments. You also told us that due to the rural nature of the district,

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181 [Wealden Local Plan – Direction of Travel consultation document – November 2020](#)

respondents highlighted the importance of agriculture, forestry and farming in relation to the services it provides and its contribution to the provision of jobs and the district's economy. It was also stated that there are opportunities relating to rural diversification particularly in relation to changing working practices. You have asked us to set out how jobs associated with the rural/agricultural economy can be supported. The diversification of farming enterprises and the conversion of redundant buildings was also largely supported by respondents to the consultation, albeit other respondents did have concerns around amenity issues for neighbouring occupiers and the nature of the diversification (would it encourage traffic or heavy good vehicles on rural roads).

**11.6** There was a general consensus that new planning policies need to balance both housing and employment growth and therefore identify sufficient land for employment provision. A number of respondents stated that mixed-use-developments are a potential way forward to provide an improved relationship between home and different types of workspaces, which may in turn reduce out commuting. In relation to education, skills and wages, you told us that we need to attract a higher skilled workforce and larger businesses to the district. It was noted that the main sectors prevalent in Wealden are lower paid sectors than those outside the district which is attracting out commuting. Along similar lines, you told us that there needs to be more business opportunities for the 16-24 age group to resolve out migration of skilled younger people in the district.

**11.7** A number of respondents to the Direction of Travel consultation also commented on the need for new office floorspace in the district and whether as much office space is required in the future owing to the Covid-19 pandemic and the changes to working patterns (particularly, the prevalence of homeworking). Infrastructure was also a key issue for respondents and particularly improving transport and access links, as well as infrastructure to support broadband and mobile coverage. Public transport and sustainable transport were also identified as key issues in relation to providing genuine travel to work choices, as well as linking housing development to main employment centres within the district.

## Tourism

**11.8** As part of the Direction of Travel consultation, you raised most frequently the importance of protecting Wealden's environmental assets and secondly the negative impact that the construction of new homes may have on the tourism industry. You also told us that transport is a key issue, and that support should be given to the development of sustainable transport links to tourist attractions that would help reduce car travel. A smaller number of respondents highlighted conversely, the adverse impacts that tourism might have on road congestion, parking and emissions, so there was mixture of views on this issue.

**11.9** There was strong support for facilitating high quality tourist experiences and increasing the length of stays, while also encouraging year-round visiting. It was suggested that Wealden's tourist offer was well placed to meet the demand for 'staycations' given the recent Covid-19 pandemic and the largely rural and in part, coastal nature of the district. There was also strong support for rural diversification schemes that included tourism uses (attractions or visitor accommodation), albeit that there were some respondents that stated that agriculture should continue to be retained for food production.

**11.10** In terms of the location and design of tourism related development, the principle of minimising the need to travel by car and promoting sustainable modes of travel was supported. However, it was noted that existing tourist attractions can be located in rural areas, or less accessible locations (i.e. historic or natural assets) and can therefore be dependent on dispersed

transport models, including the private motor vehicle. It was suggested by some respondents that new technologies, such as electric vehicles, may help to reduce environmental impacts in the future.

**11.11** Lastly, there were several comments received on what types of visitor accommodation is required to support the tourism sector in Wealden. There was strong support for an evidence-based approach, but in general, commentators were supportive of new visitor accommodation, including serviced accommodation and B & Bs, provided that amenity issues were appropriately safeguarded. There was also a general view that caravan and camping facilities should be promoted. However, there were also concerns that some caravan sites were being converted to permanent homes that are of poor quality and would negatively impact the level of visitor accommodation needed to support the tourism industry.

## Economic Policies

### Sustainable Economic Prosperity and Investment

**11.12** The Wealden Local Plan has been developed in the context of the Council's aspiration for sustainable economic prosperity and indeed a key objective of the Wealden District Council Strategy (2023-2027) is the Local Economy.

**11.13** The local plan will help meet the Council's aspirations by contributing towards enhancing the prosperity of Wealden District, and through the delivery of new jobs in the locality, will provide opportunities for residents of Wealden to work locally and reduce the need to commute out of the district, which is shown as a key issue for Wealden's economy.

**11.14** The Wealden Local Plan reflects the main requirements of the NPPF at paragraph 86, which states that local planning authorities should set out a clear economic vision and strategy, identifying strategic sites or setting criteria for supporting local and inward investment to anticipated need, whilst seeking to address potential barriers to investment which might exist, such as inadequate housing or infrastructure. It also suggests that planning policies should be flexible enough to accommodate needs not anticipated for in the plan.

**11.15** The Council's Economic Development Strategy (2023) sets out the Council's vision for the economy more widely and this states the vision for Wealden's economy is:

*An economy that is successful and provides skilled job opportunities and progression and is also balanced in terms of achieving climate change objectives, sustainably revitalising and maintaining town centres, and protecting the unique built and natural heritage that makes Wealden an attractive place to live and visit.*

**11.16** This document sets out the context, main priorities and actions for the Wealden economy in a ten-year strategy and sets out this strategy according to five priority themes that are detailed with their objectives below:

- **Vibrant places** – for Wealden's town centres to adapt to contemporary needs, providing a place for residents and visitors to enjoy and maximising income for businesses;
- **Enterprising Wealden** – to maintain a resilient and growing business base;
- **Skills and employment** – to provide the workforce and develop the working practices to help employers succeed;
- **Visitor and cultural economy** – to support the recovery of the Wealden tourism sector and seek to increase spend above pre-pandemic levels by encouraging visitors to stay

longer all year round. Develop and promote Wealden as a high-quality destination, whilst seeking to protect and enhance its special qualities.

- **Net Zero Wealden** – to reduce the CO2 emissions of businesses operating in Wealden's economy.

**11.17** For each of the five priority themes, there are both objectives and actions to deliver on these strategic priorities. Policy EC1 below will assist in the delivery of the Council's wider Economic Development Strategy, alongside other initiatives and work streams undertaken by the Council or infrastructure providers to support our local economy. This includes attracting and promoting inward investment, facilitating higher value employment development, helping to support the existing and future workforce with their skills and education, effective partnership working to secure key supporting infrastructure including rolling out full fibre and 5G infrastructure, ensuring our town centres and visitor offer align with its target markets and can be maintained, and to support existing businesses to become Net Zero.

**11.18** The Council aims to support prosperity in all forms, and it is crucial that existing businesses within the district are retained and supported where further floorspace is needed to support and/or expand that business. Policy SS5: Strategic Employment Allocations of this Local Plan identifies the strategic employment sites (and existing commitments) that are expected to come forward over the plan period.

**11.19** The Employment and Economic Study for Eastbourne and Wealden (April 2022) confirms that labour and skills shortages are a real risk for the economy, compounded by the fact that Wealden is near other employment centres that already provide jobs for a significant number of commuters. It notes that manufacturing has maintained a presence in Wealden, and in particular, has had a recent high demand for premises. However, the general trend is towards higher capital intensity and lower employment in this sector. The study identifies the following priorities for the Economic Development Strategy for Wealden:

- Low carbon and sustainability;
- Quality of place and place identity;
- Business support and advice – supply chains, continuity, human resources, skills;
- Digital business and technology investment;
- Encouraging skilled commuters to locate business or jobs in the district;
- Youth and adult training and job entry;
- Employment land provision;
- Construction innovation and sustainability;
- Flexible toolkit and funds for Town Centre Futures; and
- Data connectivity.

**11.20** These issues have been considered for the Council's Economic Development Strategy (2023) and have been identified below within Policy EC1 and will be encouraged through the planning application process for all economic development proposals.

## Policy EC1: Sustainable Economic Prosperity and Investment

The Council will support economic development proposals, growth in high-skilled jobs, and tourism that contributes towards the delivery of economic prosperity in the district. Sustainable economic development will be achieved by:

- a) Ensuring that major economic development proposals, including those strategic employment allocations identified at Policy SS5 (Strategic Employment Allocations) demonstrate how they will contribute to addressing identified local skills shortages and support local employment, skills and education;
- b) Supporting proposals for new employment premises/floorspace or the redevelopment, conversion, upgrading, intensification or reconfiguration of employment premises or floorspace on existing business sites, where this will lead to an improvement of employment provision, jobs and/or assist to meet the needs of modern business standards;
- c) Ensuring that economic development is well-designed, suitable for incorporating a range of unit sizes and flexible in terms of its operation and use;
- d) Ensuring that major economic development proposals, including those strategic employment allocations identified at Policy SS6 (Strategic Employment Allocations) deliver environmental and climate change policy requirements. This will include a positive approach to a Net Zero Wealden, opportunities to deliver sustainably constructed business premises that operate efficiently, as well as providing for sustainable modes of travel wherever possible;
- e) Supporting the creation of a safe, attractive, accessible and high-quality environment, taking opportunities to improve connectivity within settlements through cycle/pedestrian infrastructure improvements;
- f) Providing the appropriate infrastructure to support business growth and particularly seek to include EV charging points and support digital infrastructure improvements, including fibre broadband and 5G;
- g) Taking a positive approach to the formation of small start-up businesses, as well as supporting new ways of working following the Covid-19 pandemic, such as homeworking; and
- h) Delivering tourism facilities and visitor accommodation that enhances the attractiveness of the district and contributes to Wealden remaining a high-quality destination to stay and visit.

### Supporting Text

**11.21** Where there will be a requirement to secure additional infrastructure to support proposals then the Council will consider the use of either planning obligations or planning conditions. Where relevant, the Council will also use planning obligations to secure support for local employment, skills and education.

**11.22** Other policies within the local plan will also apply to economic development for example, those relating to design, the natural environment, infrastructure and climate change. This policy also relates to tourism proposals.

## Question 72

### Consultation Questions

- a Do you agree with draft Policy EC1 Sustainable Economic Prosperity and Investment?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### Strategic Employment Sites

**11.23** The NPPF confirms at paragraph 85 that planning policies should help create the conditions in which businesses can invest, expand and adapt and that significant weight should be placed on the need to support economic growth and productivity, taking into account both business needs and wider opportunities for development.

**11.24** The improvement, expansion, intensification, reconfiguration and most importantly, retention of existing employment sites across the district will be integral to the delivery of the Council's Economic Development Strategy (2023) and ensuring that employment needs are met during the plan period.

**11.25** It is noted at the County level that Locate East Sussex undertook a Land & Premises Supply Study for East Sussex (May, 2020) that assessed the commercial market for employment premises at that time. In short, it noted that the markets within East Sussex are closely linked to centres of population, including Eastbourne/Polegate/Hailsham, but that North Wealden is separate in commercial market terms to most other East Sussex markets. It's location between the coast and Crawley/Gatwick has allowed it to become a 'staging post' for business. It is also noted that in general, existing stock within the industrial market in East Sussex is considered old and in poor condition and, that there is high demand for such uses in locations along the A22 corridor, but that the key barrier is the undersupply of quality space which is fit for purpose.

**11.26** The strategic employment sites to be retained have been identified through the Employment and Economic Study for Eastbourne and Wealden (April 2022) and include all suitable existing employment sites within the district. Uses falling within Use Class E(g), B2 and B8 will be supported at these sites where they are unlikely to cause significant harm to the living conditions of neighbouring occupiers of land or buildings. The evidence base shows that there were 19 existing strategic employment sites that are suitable for protection for employment uses that are located in various parts of the district, but predominantly within or adjacent to the district's main towns, including Uckfield, Polegate, Crowborough, Uckfield and Heathfield.

**11.27** The retention of employment sites in the district during the plan period is crucial given our substantial employment need.

## Policy EC2: Existing Strategic Employment Sites

- 1 Existing strategic employment sites, premises and floorspace will be safeguarded against loss to other non-employment uses. The loss of employment uses on strategic employment sites will need to be justified and comply with the requirements of Policy EC8: The Retention of Sites in Economic or Tourism Uses of this Local Plan.
- 2 To maintain and assist in meeting the employment needs of the district during the plan period, the Council will safeguard and restrict uses at the following existing strategic employment sites to use classes E(g)<sup>182</sup>, B2 and B8. The boundaries for these sites are shown on the Policies Map.

**Table 14**

<b>Strategic Employment Sites</b>
Ashdown Business Park, Michael Way, Maresfield
Bellbrook Industrial Estate, Bell Lane, Uckfield
Chaucer Business Park, Dittons Road, Polegate
Diplocks Way Industrial Estate, Diplocks Way, Hailsham
Durgates Industrial Estate, Durgates, Wadhurst
Farningham Road Industrial Estate, Farningham Road, Crowborough
Ghyll Road Industrial Estate, Heathfield
Hackhurst Lane Industrial Estate, Lower Dicker
Lexden Lodge Industrial Estate, Crowborough Hill, Jarvis Brook, Crowborough
Milbrook Industrial Estate, Sybron Way, Crowborough
Mountney Bridge Business Park, Eastbourne Road, Westham
Park Lane Industrial Estate, Park Road, Crowborough
Ridgewood Industrial Park, New Road, Ridgewood, Uckfield
Squires Farm Industrial Estate, Easons Green, Framfield
Station Road Industrial Estate, Station Road, Forest Row
Station Road Industrial Estate, Station Road, Hailsham
Station Road Industrial Estate, Browning Road, Heathfield
Swallow Business Park, Diamond Drive, Lower Dicker
Wadhurst Business Park, Faircrouch Lane, Wadhurst

### Intensification

<sup>182</sup> This would include offices, the research and development of products or processes, or any industrial process appropriate for a residential area; formerly known as B1 Class (business).



- 3 Proposals for the intensification of employment uses (i.e. E(g), B2 and B8) within the boundary of these Strategic Employment Sites, as shown in the Policies Map, will be supported providing it is in accordance with other development plan policies.

#### Redevelopment

- 4 Proposals for the redevelopment of a site/building/premises for an employment use (i.e. E(g), B2 and B8) within Strategic Employment Sites will be supported where it does not result in the overall loss of employment floorspace, or where the loss leads to an improvement of employment provision, jobs and/or assist to meet the needs of modern business standards.
- 5 Proposals for alternative non-employment uses (including sui generis uses) will only be supported where it meets the requirements of Policy EC8: The Retention of Sites in Economic and Tourism Uses of this Local Plan, and the alternative use supports the integrity and function of the employment site.

#### Trade Counters

- 6 Trade counters in strategic employment sites will only be supported where they are clearly subsidiary and a 'de-minimus' feature of the primary use of the unit, where only a small quantum of trade counter use is proposed and where there is no adverse effect on the employment and / or neighbouring area, as a consequence of the trade counter.

### Supporting Text

**11.28** The main aim of Policy EC2 is to retain and protect the Council's main industrial estates for their core purpose (i.e. employment uses). It should be noted that proposals for 'main town centre use', including offices, will still need to comply with Policy TC2 (Sequential and Local Impact Test). In addition, proposals for other employment generating uses that fall under the 'sui generis' use class (that in effect, do not fall into any specific category in the Use Class Order) will not be supported in these defined strategic employment areas. Only the defined employment uses (i.e. E(g), B2 and B8) will be supported on these existing strategic employment sites, subject to other planning policy considerations within this Local Plan.

**11.29** Trade counters appear on several of our strategic employment sites and such uses do have the ability to impact the operation of other neighbouring employment uses in terms of parking and highway congestion specifically. In cases where trade counters are a significant proportion of the unit, they can act as 'retail' uses and account for significant vehicular movements within an existing employment site. However, where trade counters are clearly subsidiary and a 'de-minimus' feature of the primary use of the unit, proposals will continue to be supported on strategic employment sites subject to the criteria listed.

**11.30** It is noted that all defined employment uses (i.e. E(g), B2 and B8) within the strategic employment sites listed above will be safeguarded from loss through Policy EC8: The Retention of Sites in Economic or Tourism uses. Further details on what is required are detailed within that policy, but in short, it will be expected that any planning application involving the loss of employment uses on the sites listed above will need to be accompanied by details of comprehensive marketing strategy (over an 18-month period) and a financial appraisal of the site which demonstrates the continued use of the site for employment uses is no longer viable. The marketing strategy/financial appraisal will need to confirm not only that the existing site is

unviable for that employment use, but also that any redevelopment for the continued use or an alternative employment use is unviable.

### Question 73

## Consultation Questions

- a Do you agree with draft Policy EC2 Existing Strategic Employment Sites?
- b Do you agree with the list of existing strategic employment sites defined in this policy? Are there any missing, or are there any others that should be included?
- c Should we change anything? If so, what should we change and why?
- d Have we missed anything? If so, what have we missed and how should it be included?

### Retention and/or Loss of Existing Non-Strategic Employment Sites, Premises or Floorspace

**11.31** Existing employment sites are located throughout the district and offer a wide variety of employment stock, employment uses and opportunities, which in turn demand different rental values and help to support balanced and sustainable communities and provide employment opportunities to a range of skill levels. The Employment and Economic Study (April 2022) provides strong justification to retain and protect the district's supply of employment sites, both urban and rural. Retaining employment sites and supporting their growth will ensure we meet our economic objectives by supporting job provision that includes the retention of local jobs. This will also help support other objectives of this Local Plan, such as reducing car travel and out commuting from the district. This applies to all business uses and types of employment across the district, including small-scale enterprises within rural areas.

**11.32** The demand for offices and other uses under Use Class E(g) is expected to fluctuate over the plan period and will accord with changes in economic and market conditions. The Covid-19 pandemic and the resultant continuation of homeworking has resulted in uncertainty across this sector of the local economy. The changes to the GDPO, which has enabled the change of use of Use Class E(g) uses (formerly known as Use Class B1), such as offices to residential use has also had a significant impact on office stock, particularly in relation to Wealden's town centres and on strategic employment sites.

**11.33** The table below demonstrates the year-on-year losses in office floorspace within Wealden District (the only exception being the 2022/23 period). It also shows that office floorspace losses in Wealden District have been occurring prior to the onset of the Covid-19 pandemic in 2020.

**Table 15 Floorspace Completions in Use Class E(g)**

	Offices (net) sqm	Research and Development (net) sqm	Light Industrial (net) sqm
2022/23	536	0	-931
2021/22	-1,581	0	-791
2020/21	-1,521	0	-1,863
2019/20	-1,861	0	553
2018/19	-3,034	96	1,527
2017/18	-1,791	0	586
Total	-9,252	96	-919

**11.34** Given the above, the Council's preferred approach is to retain employment uses in all parts of the district. Only where it is sufficiently evidenced that a site is no longer viable or suitable for economic uses under Policy EC8: The Retention of Sites in Economic or Tourism Uses, will alternative non-employment uses be considered.

## Policy EC3: Retention and / or Loss of Non-Strategic Employment Sites, Premises or Floorspace

### Non-Strategic Employment Sites

- 1 Existing employment sites, premises, buildings and floorspace currently used for employment purposes (use classes E(g), B2 and B8) will be protected against loss to non-employment uses.
- 2 Where planning permission is required, proposals that will result in the loss of employment use will only be permitted where:
  - a) There are no strong economic reasons to retain the site, premises or floorspace;
  - b) The proposal would result in economic benefits including generating an equivalent number of, or an increase in jobs;
  - c) The site is not appropriate for the continuation of its present use, or any other employment use, due to a significant detriment to the environment or amenity of the area;
  - d) The new proposal would not be detrimental to the function or operation of the wider site; and
  - e) Sufficient parking is provided.
- 3 Proposals for the loss of a business use under use classes E(g), B2 and B8 that will not generate an alternative employment use will be considered in accordance with Policy EC8: The Retention of Sites in Economic or Tourism Uses.

## Supporting Text

**11.35** The loss of employment floorspace to an alternative non-employment use will not normally be supported and would need to be justified and comply with the requirements of Policy EC8: The Retention of Sites in Economic or Tourism uses of this Local Plan in the first instance.

**11.36** The criteria set out in Policy EC3 above provides the basis for pre-application discussions with Council officers and for the determination of planning applications for all proposals that involve the loss or redevelopment of non-strategic employment sites and premises. All proposals for the loss or redevelopment of non-strategic employment sites and premises should therefore accord with the criteria set out in this policy. The level and scale of evidence required will depend upon the scale and location of the proposal.

**11.37** In some circumstances, it is known that the continuation of an employment use on a site may be inappropriate due, for example, to an existing conflict with or affecting a neighbouring use (i.e. residential amenity), an unsafe vehicle access for the existing employment use, and/or increased HGV usage along the rural road network. The onus will be with the applicant to demonstrate that the loss of employment land is justified for those reasons. The judgement on these issues will be based upon the impact of a range of potential employment generating uses (under Use Classes E(g), B2 and B8) on the site, premises or building and not solely that of the previous or most recent operation.

### Question 74

#### Consultation Questions

- a Do you agree with draft Policy EC3 Retention and/or Loss of Non-Strategic Employment Sites, Premises or Floorspace?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

## The Rural Economy

**11.38** The NPPF confirms that planning policies should support sustainable growth and expansion of all types of business in rural areas by taking a positive approach to new development and by supporting growth and expansion of all types of business and enterprise in rural areas. The Employment and Economic Study (April 2022) shows that Wealden has a strong rural economy, providing a range of economic uses and jobs and confirms the importance of the rural economy for our district.

**11.39** There are many ways in which we can support the rural economy including rural diversification schemes, the conversion of rural buildings to alternative uses and through supporting development associated with agriculture and forestry. Certain works associated

with agricultural and forestry development, as well as the conversion of agricultural barns to alternative uses are permitted development. However, permitted development does not always apply in the High Weald AONB for these types of proposals.

**11.40** Whilst recognising that supporting the rural economy is important, there are other considerations in relation to the suitability of development. For example, development should not impact upon the natural environment, landscape character or the function of the countryside. There are also factors to consider such as the impact of the economic use on our rural roads as well as sustainability.

**11.41** Policy EC4 below therefore provides a criteria-based policy that supports the growth of our rural economy whilst also ensuring that development is appropriate in relation to its location, scale and design.

## Policy EC4: Rural Economy

### Part 1: Economic development uses outside of development boundaries

- 1 Proposals for economic development outside development boundaries, as defined on the Policies Map, will be supported where:
  - a) The rural location for the business is justified to sustain, expand or enhance the rural economy;
  - b) It enhances local employment opportunities;
  - c) The location is considered sustainable in terms of accessibility;
  - d) The proposal delivers new EV charging points at the premises;
  - e) The proposal would not prejudice existing uses or require further rural buildings to facilitate the existing use;
  - f) The proposal is of a scale that is consistent with the proposed use and its rural character and location; and
  - g) The proposal would not generate traffic of a type or amount inappropriate for the rural roads affected by the proposal and the site's existing vehicular access is suitable or can be made suitable for the proposed use.

### Part 2: Conversion, re-use and adaptation of existing rural buildings for business use

- 2 Proposals will only be supported outside of development boundaries where:
  - a) The building is structurally sound and of a permanent and substantial construction capable of conversion without significant new build, extension or alteration;
  - b) The proposal makes an efficient and viable use of a redundant or disused building, including the optimal viable use of a heritage asset where applicable;
  - c) There is no impact on local amenity, landscape character or heritage assets;
  - d) There is an enhancement to the immediate setting; and
  - e) The curtilage of the building is restricted to facilitate the requirements of the employment use only.

### Part 3: Agricultural, forestry, horticultural and other rural based land development

- 3 Where a proposal for agricultural, forestry, horticultural and other rural based land use cannot be accommodated within an existing building, proposals will only be supported where:
  - a) There is a justified business case that demonstrates that development is necessary at the scale proposed to sustain and meet the reasonable needs of the existing rural use;
  - b) Previously developed land is considered in the first instance for the new building;
  - c) The siting, design and external appearance of the development is designed to meet the needs of the rural business, respecting local rural distinctiveness, traditional farmstead groupings and is appropriately located to existing buildings;
  - d) The design and location of the building relates well to the intended rural use and reflects the functional need of the rural use; and
  - e) The development does not have an intrusive impact on the wider landscape it sits within, particularly where a new building is sited within or adjoining designated landscapes.
- 4 Proposals that are for the purpose of assisting farms to modernise and/or adapt to funding changes or climate change will be supported in principle subject to other policies within this local plan.

### Supporting Text

**11.42** Policy EC4 above outlines the criteria that should be complied with where there are proposals for economic development schemes in rural areas, the conversion of rural buildings to alternative employment/business uses and proposals for new rural buildings.

**11.43** Under Part 1 criteria (iv), it is anticipated that the proposed development should not prejudice the continued, principal rural use of the holding and this should be demonstrated through the submission of a diversification/farm business plan as part of the planning application to outline the business plan for the farm/rural use in the short to longer term.

**11.44** In relation to the conversion or re-use of existing rural buildings, under Part 2, criteria (i) evidence may need to be submitted in the form of an independent structural survey and additional drawings if this is not immediately evident that the building is structurally sound. The Council may require the review of the survey programme of works for the conversion by an independent consultant, and in those cases, the applicant would be expected to cover the costs of this.

**11.45** The Council will also consider removing permitted development rights for any new buildings brought forward through rural diversification schemes, in order to protect against subsequent changes to the building (in terms of its use or scale) that may result in negative impacts for the agricultural holding/rural enterprise. Where appropriate, planning conditions will be imposed to remove permitted development rights for alterations and/or extensions to the building and the erection of other ancillary buildings, fencing within the curtilage of the building. Where a converted building is permitted for tourism accommodation, a holiday occupancy condition will be attached preventing the use of the building as a sole or main residence.

**11.46** Where a new agricultural building is proposed, the Council would expect that the applicant will consider the entirety of their holding and locate the building in an area that is not prominent within the landscape (particularly in the High Weald AONB) to ensure landscape character is conserved where possible. If a suitable location can be found then it should avoid, or where necessary, minimise the installation of external lighting.

**11.47** Lastly, in cases where the proposal involves the removal of derelict/vacant building on site, where a new building is proposed, then the local planning authority may consider the use of planning conditions attached to that planning permission to remove those buildings (or as last resort, a legal agreement).

## Question 75

### Consultation Questions

- a Do you agree with draft Policy EC4 Rural Economy?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### Equestrian Development

**11.48** The Council recognises the role that the countryside can play in providing opportunities for the riding and keeping of horses, which proves to be a popular pursuit in the district. Wealden provides an attractive natural environment for horse riders, as well as providing an extensive bridleway network. The riding and keeping of horses can provide jobs within the rural economy and supports some commercial equestrian operations in rural areas. Paragraph 102 of the NPPF also confirms that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

**11.49** However, planning controls are required to prevent harm to the character of the rural area through the subdivision of fields and the proliferation of buildings and ancillary features within a rural landscape. Typically, proposals for stables will include a tack room, as well as external hard standing, but may also include a sand school, fencing and jumps, as well as potentially a new vehicular access from the highway. For commercial and/or larger equestrian operations, proposals may include floodlighting (although this will be rarely supported for private/domestic use in the countryside) and/or car parking, all of which are likely to require planning permission.

**11.50** Policy EC5 below sets out the criteria which will be considered when determining planning applications for new equestrian development. This should be read in conjunction with other planning policies contained within the Local Plan particularly in relation to conserving landscape character, highways and design.

## Policy EC5: Equestrian Development

- 1 Proposals for equestrian facilities, including any ancillary buildings or structures, will be supported provided that the following criteria is met:
  - a) the proposal is not sited in a particularly prominent or isolated location where new development of this nature would be considered inappropriate to its rural setting;
  - b) it can be demonstrated that the re-use of existing buildings on sites for equestrian use are inappropriate before new or replacement buildings are considered;
  - c) if new buildings/facilities are required, that they are of an appropriate scale to their landscape setting and, where feasible, closely related to existing buildings;
  - d) the design of the development incorporates a drainage system that provides for the suitable disposal of foul and surface water drainage, including animal waste;
  - e) sufficient grazing land for horses is available;
  - f) the proposal should, where possible, be well related to the existing bridleway network;
  - g) that any outdoor lighting/floodlighting is designed to avoid a detrimental impact on visual or residential amenity, wildlife or highway safety, but allows the safe operation of activities on site;
  - h) car parking requirements can be accommodated satisfactorily within the immediate surrounds of the buildings, or where this is not suitable due to highway safety concerns, an alternative solution is agreed; and
  - i) the proposal does not generate traffic of a type or amount inappropriate for the rural roads affected by the proposal or require improvements or alterations to these roads, which would be detrimental to the rural character of the area.
- 2 Where the above requirements are met, the Council may also find it appropriate to consider the following restrictions through planning conditions:
  - a) the removal of permitted development rights for fencing, hardstanding and external storage, where it is considered that there is the need to control potential adverse landscape impacts which can arise from the poor management of the site or the excessive sub-division of the land.

### Supporting Text

**11.51** Policy EC5 confirms the criteria for all equestrian developments that require planning permission. In terms of criteria e) and f) of this policy, and in assessing planning applications for this use, adequate provision should be made for the safety and comfort of the horses in terms of the land needed for grazing and exercising. It is considered that sufficient grazing land for each horse is vital for their long-term health and can address the issue of subdividing fields and creating fences that can cause harm to the rural character of the area. While there is no common standard applicable for minimum land requirements and this would depend on the breed and size of the horse, how many horses are kept and the nature of land for grazing, a desirable guideline from the British Horse Society is between 0.4 and 0.6 hectares per horse (1 to 1.5 acres per horse).



**11.52** With respect to criteria (g) outdoor lighting or floodlighting will rarely be acceptable in the open countryside or for private/domestic stables for private use, where the lighting will have a detrimental impact on visual or residential amenity, wildlife or highway safety. This is of particular importance within or adjacent to the High Weald AONB or adjacent to the SDNP, or in areas identified as having 'dark skies'. Any lighting necessary for commercial equestrian uses will need to be carefully sited and designed to alleviate the impact on the landscape and kept to the minimum needed for that commercial use. Proposals for outdoor lighting schemes will need to consider Policy NE10: Light Pollution and Dark Skies of this Local Plan.

**11.53** Upon the attainment of planning permission for equestrian uses, in some circumstances, it may be required for permitted development rights for the erection of fencing or the creation of hardstanding and/or external storage to be removed. This is to ensure that the inappropriate subdivision of fields does not come forward, that may otherwise detrimentally impact the character of the surrounding landscape. This will be achieved by virtue of a planning condition attached to the approved planning permission, in accordance with Article 3(4) of the Town and Country Planning (General Permitted Development) (England) Order 2015 and will be determined on a case-by-case basis.

## Question 76

### Consultation Questions

- a Do you agree with draft Policy EC5 Equestrian Development?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

## Tourism Policies

### Tourism Facilities and Attractions

**11.54** Tourism makes a significant and important contribution to the economy of Wealden District and is an important part of the wider economy. As of 2019 (pre-Covid-19 pandemic), there was approximately 5.97 million trips undertaken within Wealden District with a total spend of £301.1 million spent by tourists during those visits. The Council has published a Wealden Visitor Accommodation Study (2024) that states the market for tourism post Covid-19 will be to maintain a steady volume of trips and associated demand for visitor accommodation in all markets, and that this is likely to grow over the lifetime of the Local Plan.

**11.55** One of the five priority themes of the Wealden Economic Development Strategy (2023) is the visitor and cultural economy, with the aim being to:

*support the recovery of Wealden tourism sector and seek to increase spend above pre-pandemic levels by encouraging visitors to stay longer all year round. It also encourages the development and promotion of Wealden as a high-quality destination, whilst seeking to protect and enhance its special qualities.*

**11.56** The document also supports the development of low-carbon, eco-friendly, non-serviced accommodation in rural areas and serviced accommodation throughout the district, as well as supporting accommodation providers in providing EV charging points.

**11.57** There are a number of significant tourist attractions within the district that includes Pevensey Castle, Herstmonceux Castle, the Ashdown Forest and Pooh Corner, the Lavender Railway Line, Bewl Water and Sheffield Park and Gardens to name a few, many of which are situated in rural locations. Our market towns have relatively limited tourism attractions and accommodation. Wealden's larger budget hotels are also located alongside the A22 between Polegate and Uckfield, rather than in the town centres themselves.

**11.58** The NPPF confirms under its glossary that art, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities) are 'main town centre uses' and should therefore be directed to town centres first, before edge of centre and out of centre locations are considered. However, the NPPF at paragraph 93 confirms that the sequential approach should not be applied to applications for small scale rural development, albeit that national policy does not provide a definition for small-scale in terms of floorspace. In terms of rural economic development, national planning policy also confirms that local planning authorities should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

**11.59** Policy EC6 below provides criteria for both new tourism facilities and attractions, as well as improvements to existing facilities and attractions. In line with national planning policy, new tourism facilities or attractions that are well related to a sustainable settlement (as defined in the settlement hierarchy), which has links to sustainable modes of transport will be supported. The policy also provides support for tourism in rural locations where a robust business plan is provided and it relates to an existing attraction, which relies upon a geographically fixed resource (be it an historic building or natural landform), which justifies the development.

**11.60** It is equally important to protect and retain existing, well located, and suitable tourist facilities and attractions across the district, to maintain a healthy tourism sector that continues to contribute towards Wealden's economy in the future. Policy EC6 confirms that the loss of tourism facilities and attractions to alternative uses will not be supported unless it is demonstrated that the business is no longer viable and has no reasonable prospect of continuing.

## Policy EC6: Tourism Facilities and Attractions

### Provision of New, Improved, Upgraded or Extended Tourism Facilities and Attractions

- 1 The Council supports new development to advance the visitor economy for both tourism, leisure and business purposes where a proposal demonstrates that it:
  - a) is of an appropriate scale, nature and appearance, relating well to its surroundings;
  - b) is located within the development boundary, as defined on the Policies Map, and is easily accessible by sustainable modes of transport, including walking and cycling;
  - c) assists in town / village regeneration, contributing to the local economy;
  - d) benefits both existing residents and visitors;

- e) provides for high quality and sustainable tourism facilities on a year-round basis; and
- f) contributes to the retention and enhancement of existing facilities.

2 Proposals for tourism facilities and attractions in the countryside will only be supported where:

- a) it relates to an existing tourism facility or attraction that is seeking to expand and is of a scale, form and design suitable to its location; or
- b) where sustainable settlements would not be suitable for the scale and nature of the facility or attraction, for example where an existing attraction relies on a geographically fixed resource; or
- c) where there will be an overriding benefit for locating away from a sustainable settlement and the proposal can be accessed by public transport. An overriding benefit could relate to the economy, community or environment.

3 Proposals for tourism facilities and attractions outside development boundaries, as defined on the Policies Map, will require a robust case to be made as part of its business plan and will also need to meet the criteria under Part 1 of Policy EC4: Rural Economy of this Local Plan.

#### Protection of Existing Tourism Uses

4 Development resulting in the loss of tourism facilities and attractions to alternative uses will need to be considered in line with Policy EC8: The Retention of Sites in Economic or Tourism uses.

### Supporting Text

**11.61** The criteria set out in Policy EC6 will be the basis for pre-application discussions with Council Officers and for the determination of planning applications for all proposals for tourism facilities and attractions. The Council largely supports new development to advance the visitor economy. However, proposals for tourism facilities that do not relate well to an existing sustainable settlement will only be supported where a robust case is made for a countryside location as part of any business plan. The business case will need to fully justify why that location is needed to deliver a tourist facility/attraction, and how the business expects to be profitable over a 3-year period. The review of the submitted information may be required by an independent consultant, and it is expected that the applicant will cover the cost of this.

### Question 77

#### Consultation Questions

- a Do you agree with draft Policy EC6 Tourism Facilities and Attractions?
- b Should we change anything? If so, what should we change and why?

- c Have we missed anything? If so, what have we missed and how should it be included?

## Visitor Accommodation

**11.62** The Visitor Accommodation Study (2024) provides an independent assessment of the current status of visitor accommodation provision in Wealden District and its potential for future development over the plan period. Within Wealden's administrative area (excluding the SDNP), there is a total of 309 establishments with just over 11,000 bedspaces operating in 2022. Non-serviced accommodation accounts for over 80% of bedspaces and this is largely dominated by traditional touring and camping sites, followed by holiday parks. In terms of their location, the areas outside of the High Weald AONB account for 67% of bedspaces, with the remainder inside the High Weald AONB (or in the towns surrounded by it, i.e. Heathfield and Crowborough). The supply of visitor accommodation has increased significantly since the time of the last study (undertaken in 2009), with a 38% increase in bedspaces. The supply of hotels, touring caravan and camping sites and self-catering accommodation has increased, whereas pub accommodation and guesthouse/bed & breakfast accommodation has reduced. Demand for visitor accommodation is still significant and the Visitor Accommodation Study (2024) recommends the development of additional visitor accommodation in all sectors including both serviced and self-catering accommodation to meet the tourism requirements in sustainable locations.

**11.63** A key element of Wealden's Economic Development Strategy (2023) is to increase overnight stays, with around half of visitors to Wealden coming from the local area, the number of overnight stays is limited. Just 8% of all visits are by overnight visitors, but these make up 30% of spend. Day visitors spend less but have a disproportionately higher impact. One of the main challenges for the visitor economy in Wealden is the lack of serviced accommodation and accommodation with green tourism accreditation that limits the scope of the tourism market.

**11.64** The retention of existing visitor accommodation types across a variety of economic groups, helps to attract a mixture of visitors at all values and provides support to other associated businesses within the district (i.e. food, hospitality and leisure specifically). It is important to control the loss of visitor accommodation to prevent the threat to the quality, quantum and choice of accommodation on offer across the district. Higher value uses such as residential development, and changes of uses of existing holiday parks (with static caravans in situ) to permanent residential accommodation have already taken place across the district, which will, if not intervened, harm the tourism sector in the longer term.

**11.65** The use of land for touring caravans and camping sites can assist in the rural economy through rural diversification and help support the provision of services in rural areas (such as Public Houses). However, such sites can be visually intrusive particularly in the open countryside or on designated landscapes, such as the High Weald AONB. They usually also require some permanent buildings, if built at scale, such as a reception area and/or a toilet/shower block. Where possible, it is expected that any associated facilities should be contained within existing buildings on site. Although the Council will be cautious in terms of allowing new caravan and camping sites in rural areas, the Council does recognise that with care, it is possible to design and locate new sites at the edge of sustainable settlements that have a limited impact on townscape and respect the landscape and amenity.

**11.66** As is highlighted above, visitor accommodation in the district has historically been and is continuing to be dominated by the self-catering market in rural areas and the Council is aiming to provide for all sectors, but this should include the provision of serviced visitor accommodation in Wealden's town and village centres. Policy EC7 below provides the criteria in which the provision of new visitor accommodation of all types will be assessed.

## Policy EC7: Visitor Accommodation

- 1 The Council supports new development for visitor accommodation in both attracting visitors to the district and supporting local jobs within Wealden. The Council will seek to retain and provide a broad range of visitor accommodation.
- 2 Development proposals for new visitor accommodation, including extensions and improvements to existing accommodation, will be supported where proposals can satisfy the following criteria:
  - a) it increases the range and/or quality of visitor accommodation;
  - b) in the case of new serviced tourist accommodation, the proposal is located within the development boundary of a sustainable settlement (as defined in the settlement hierarchy) and is easily accessible by sustainable modes of transport, including walking, wheeling and cycling;
  - c) in the case of non-serviced tourist accommodation, this will be supported across the district (subject to other policies in this Local Plan) where the proposal seeks to improve the provision of sustainable transport options to the site to ensure that the site is accessible from a sustainable settlement;
  - d) opportunities are taken to use existing buildings on site where possible. Where new buildings are essential, they must be designed sensitively and to a high standard;
  - e) the proposed development has no significant adverse impact on the landscape, ecological and historic characteristics of the site;
  - f) the proposed development is of an appropriate scale to its immediate surroundings and would not detrimentally impact the character of the area;
  - g) there would be no harm on highway safety or a severe impact on the immediate highway network;
  - h) the car parking requirements for the proposal can be accommodated satisfactorily within the immediate surrounds of the buildings, or where this is not suitable due to highway safety concerns, an alternative solution is agreed.
- 3 Where planning permission is granted for caravan and camping sites, it will normally be subject to a planning condition restricting the use to holiday/leisure accommodation only and the site may also be subject to a seasonal occupancy condition in limited circumstances.

### Retention of Visitor Accommodation

- 4 Development resulting in the loss of sites or premises used, or last in (lawful) use, as visitor accommodation<sup>183</sup> to alternative uses will need to be considered in line with Policy EC8: The Retention of Sites in Economic or Tourism uses.

## Supporting Text

**11.67** The NPPF under its glossary confirms states that art, culture and tourism development including hotels are ‘main town centre uses’ and should therefore be directed to town centres first, before edge of centre and out of centre locations are considered. As noted elsewhere, unless the local planning authority considers a proposal for serviced accommodation to be ‘small-scale’, it may be subject to the sequential test under Policy TC2: Sequential and Local Impact Test, if located outside of a defined town centre. This could include any significant extensions to existing hotels and other serviced-visitor accommodation located outside of town centres.

**11.68** Where proposals for new, permanent serviced accommodation are located within the 7km buffer zone of the Ashdown Forest Special Protection Area (SPA) then contributions towards appropriate mitigation measures to deal with any increases in recreational pressure emanating from the development will be required in accordance with Policy NE5: Ashdown Forest SPA. This may include contributions towards Strategic Access Management and Monitoring Strategy (SAMMS) and may also require contributions to SANGs provision depending on the scale, location and nature of the development in accordance with a Habitats Regulations Assessment.

**11.69** All proposals for caravan and camping sites (including extensions to existing sites) must accord with the criteria above. In terms of landscape impact, a comprehensive landscaping scheme and management plan is fundamental to ensure no detrimental impact on the surrounding landscape, including the consideration of boundary treatment to the site that will need to utilise native species. To reduce the visual impact of new touring caravan and camping sites and to prevent them being used throughout the year, the Council Officer may consider the use of a seasonal occupancy condition in limited circumstances.

**11.70** Touring caravan sites are not suitable for permanent occupation and their use will be restricted to holiday accommodation only. This would be secured through a planning condition and may be checked on individual sites via the planning enforcement team on an ad hoc basis.

**11.71** Where a development proposal would result in the loss of existing visitor accommodation to an alternative use, this will only be considered acceptable where a) it can be demonstrated that the business is no longer viable and has no reasonable prospect of continuing and b) alternative visitor accommodation businesses have been fully explored. With respect to the first issue, the evidence required for this is outlined within Policy EC8: The Retention of Sites in Economic or Tourism uses and will be scrutinised through the planning application process.

**11.72** In terms of exploring alternative visitor accommodation businesses, the applicant will be expected to show that all reasonable alternatives to the existing type of visitor accommodation on site have been fully considered before the site is to be released to a non-tourism related use. The marketing period for site will need to be at least 18-months prior to the submission of

<sup>183</sup> Tourism accommodation includes hotels, guesthouses, bed and breakfast establishments, self-catering accommodation and outdoor accommodation such as caravan, camping sites and glamping sites (including yurts, log cabins and pods).

a planning application and it is therefore expected that the marketing of site would include all reasonable visitor accommodation uses.

**11.73** Lastly, Council officers for any planning application for the loss of tourism (uses) will only consider the last 'lawful' use of the site prior to the submission of a planning application proposing an alternative use (even if that alternative use is ongoing unlawfully). This means that any marketing information or viability information submitted to the local planning authority should only consider the last 'lawful' use of the site for tourism uses.

## Question 78

### Consultation Questions

- a Do you agree with draft Policy EC7 Visitor Accommodation?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?

### The Retention of Sites in Economic or Tourism Use and Commercial Community Facilities

**11.74** Employment sites and premises, commercial community facilities, tourist attractions and facilities, as well as visitor accommodation all play an important social and economic role within the district and help to maintain and support sustainable communities, particularly in rural areas, which assists with preventing out commuting from the district.

**11.75** However, it is known from the Council's Viability Assessment (2024) that the commercial pressure on such sites and premises in these uses is to change their use to an alternative higher value land use, most notably, housing, which is strong. This has meant that many locations within the district and particularly rural settlements have been losing commercial uses and facilities, which has meant a lack of sufficient job opportunities especially for younger people, where such sites are converted to non-employment uses.

**11.76** It is therefore vital that there is framework for commercial community facilities, as well as economic and tourism uses to be retained where at all possible, and for their loss to be resisted unless it is demonstrated that the business is no longer viable and has no reasonable prospect of continuing in its current use. The general justification for the protection and retention of economic uses, commercial community facilities, tourism attractions and facilities, as well as visitor accommodation is dealt with under Policy EC3: Retention and / or Loss of Existing Employment Sites, Premises or Floorspace; Policy EC6: Tourism Facilities and Attractions and Policy and Policy EC7: Visitor Accommodation, as set out in this chapter, as well as Policy INF7: Local Services and Community Facilities.

**11.77** Policy EC8 below deals with specific requirements for proposals that involve the loss or deterioration of a site/premises that is a commercial community facility, or is in a tourism or economic use, including those sites that were last in such a (lawful) use. This includes what evidence is required to demonstrate that a site is redundant and what should be included in a

marketing campaign over an 18-month period to demonstrate that a site has remained unlet or for sale, despite genuine attempts to let or sale on reasonable terms. This policy also deals with proposals that would result in the loss of facilities or features that may undermine the viability of the existing commercial community facility, tourism use or economic use.

## Policy EC8: The Retention of Sites in Economic or Tourism Use and Commercial Community Facilities

- 1 In accordance with policies set out in this Local Plan, proposals that involve the loss or deterioration of sites/premises in a tourism or economic use\*, including those sites that were last in such a (lawful) use, as well as commercial community facilities\*\* must demonstrate that the site is genuinely redundant and there is no reasonable prospect of a continued use, as well as being supported by the following:
  - a) evidence of an active and effective marketing campaign that will be expected to cover a period, normally of 18 months, with written confirmation from a specialist commercial agent(s) that clearly indicates a lack of demand for the existing use (or an alternative use where this applicable). This marketing process would also need to demonstrate that the site/premises has remained unlet or for sale for the 18-month period, despite genuine and sustained attempts to let or sell on reasonable terms; and
  - b) evidence that demonstrates that the site/premises is not or is unable to be financially viable for its current use (or last lawful use), including alternative uses where applicable.
- 2 Proposals that would result in the loss of facilities or features that may undermine the viability of the existing commercial community facility, tourism use, or economic use would normally be refused planning permission unless there are exceptional circumstances for such a proposal to proceed and this meets all other policy provisions in this Local Plan.
- 3 Where the review of submitted information by an independent consultant is considered necessary, the applicant will be required to cover such costs as part of the planning application process.

### Supporting Text

**11.78** Where a development proposal would result in the loss of existing commercial community facility, tourist facilities/accommodation or economic use (those within use class E(g), B2 and B8) for an alternative use, the planning application should be supported by the following:

- a viability report, prepared by a relevant professional, that includes both financial accounts and marketing information. The Council will require the submission of trading accounts, normally for a period of three years for an existing business. The marketing information will need to illustrate that sustained efforts to promote, improve, and market the use, for sale or let, at a reasonable value which reflects the existing use and condition of the



building at that time (this would require a minimum of two independent valuations of the building) have not been successful, and the use is no longer viable;

- in terms of the evidence required in the viability assessment, this should include as a minimum; a history of previous uses and the period(s) of vacancy of the property/premises; details of the agent(s) used in the viability report/marketing process; the dates that the property was marketed for, including any visible evidence of this, be it advertisements in print or online; the records of any responses and interest shown in the use; and any offers received for either sale or let, with justified reasons for those offers being rejected (i.e. the offer received fell well below the marketed price).

**11.79** Ordinarily, the marketing period should run for a period of at least 18-months before a planning application is to be submitted to the Council, with the premises being offered for sale or let both locally and regionally. As discussed within Policy EC8, a review of the submitted information may be required by an independent consultant during the planning application process and the applicant will be required to cover such costs as part of the planning application process.

**11.80** Lastly, Policy EC8 confirms that proposals that would result in the loss of facilities or features that may undermine the viability of the existing commercial community facility, tourism use, or economic use would normally be refused planning permission unless there are exceptional circumstances for such a proposal to proceed and this meets all other policy provisions in this Local Plan. In short, proposals will have to consider the need to retain adequate amenity space (internal and external) and parking, where their loss may undermine the viability of an existing commercial community facility, economic use, or tourism use. It is likely, for example, that the loss of car parking for rural visitor accommodation will lead to lower occupancies, as many visitors would need alternative methods of getting to the visitor accommodation. Such ancillary features are vulnerable to planning applications for housing development and the Council will consider through this policy whether their loss could undermine the existing use.

## Question 79

### Consultation Questions

- a Do you agree with draft Policy EC8 The Retention of Sites in Economic or Tourism Use and Commercial Community Facilities?
- b Should we change anything? If so, what should we change and why?
- c Have we missed anything? If so, what have we missed and how should it be included?