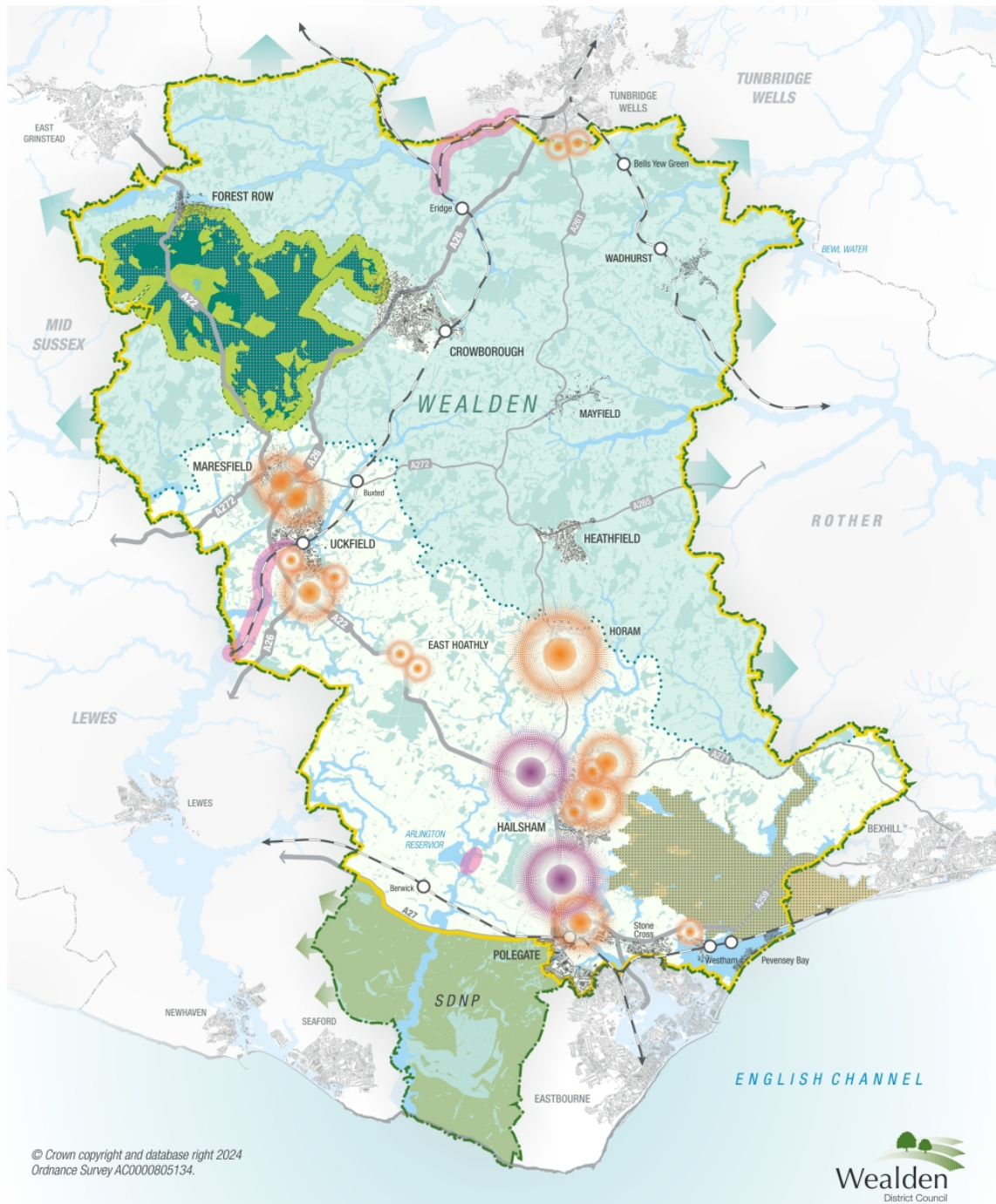


# Chapter 4

## Spatial Strategy



### Map 1 Wealden District Key Diagram



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Ordnance Survey AC0000805134.



**Existing Assets**

- Wealden District Boundary
- Local Plan Area
- Major A Roads
- Minor A Roads
- Rail
- Rail Stations
- Settlements
- South Downs National Park (SDNP)
- Woodland
- Water

**Designations**

- Special Protection Area (SPA)
- Special Area of Conservation
- SPA 400m Buffer Zone
- Ramsar Site
- High Weald National Landscape

**Draft Allocations**

- Strategic Employment Allocations
- Strategic Housing Allocations 100 - 199
- Strategic Housing Allocations 200 - 399
- Strategic Housing Allocations 400+
- Safeguarded Infrastructure

## Introduction

**4.1** This chapter sets out the Council's draft spatial strategy for the district between 2023 and up to 2040. The draft spatial strategy and associated strategic policies aim to deliver the local plan's vision and objectives by guiding development to the right locations and by delivering sustainable growth that takes account of people, places and our environment.

**4.2** As part of our Direction of Travel Consultation we consulted on four high-level growth strategy options. These included focused growth, including Large Extensions to Existing Sustainable Settlements, semi-dispersed growth to existing sustainable settlements and Larger Villages; dispersed growth across all settlements; and an option to deliver a new settlement(s). The responses we received when asking consultees what their preferred option was, were relatively evenly split between the four growth options and there was not an overall preferred approach.

**4.3** Since the Direction of Travel Consultation, we have considered the feedback received and have developed these options further as well as identifying additional options. The conclusion from the work we have undertaken so far is that no one option provides enough land for the growth we need to deliver as set out in national policy. Our draft growth strategy is therefore a hybrid option, from combining several growth strategy options.

**4.4** We are now in a position to present a draft spatial strategy for the purpose of engaging with our communities, stakeholders, partners, landowners and developers in a meaningful way through this Regulation 18 Draft Local Plan consultation. The spatial strategy includes both our growth strategy, as well as a number of strategic policies, that are key to achieving our spatial strategy.

**4.5** The spatial strategy we present is draft at this stage. We will consider feedback from this Regulation 18 consultation and we will also undertake further evidence gathering and testing to help develop the spatial strategy and its associated policies further and we will present these at the next Local Plan Regulation 19 stage. However, based on the information collated up until this point we consider that the draft spatial strategy presented is deliverable at this stage and have sought to provide draft site allocations and strategic policies consistent with this spatial strategy, as well as the associated draft development management policies also contained within this Local Plan.

## Defining our Draft Spatial Strategy

**4.6** Throughout the plan-making process so far, we have been working with our partners and appointed consultants to test and understand our strategic priorities, opportunities and our options for delivering these spatially. We have produced numerous evidence base studies, of which we must balance the outputs of these to positively plan for the future and ensure that we meet national policy requirements. Key to our spatial strategy and local plan overall is the NPPF's 'presumption in favour of sustainable development'. In short, this requires us to meet the development needs of our area, align growth and infrastructure, improve the environment, as well as mitigate and adapt to climate change.

**4.7** Meeting the development needs of the area is a key focus of this plan. However, we are also required to consider whether we can meet development needs without adversely impacting areas or assets of importance, such as our designated biodiversity sites and irreplaceable habitats, national landscapes such as the South Downs National Park and High Weald Area of Outstanding Natural Beauty (AONB), designated heritage assets or areas at risk from flooding. We must consider whether these factors are reasons to restrict growth in our area, or whether



it can be demonstrated that adverse impacts would significantly outweigh the benefits when assessed against the NPPF as a whole. We must therefore plan positively and carefully, to deliver our future needs for the district.

**4.8** In defining a spatial strategy, we have considered the following:

- Previous engagement with the community, partners and stakeholders on our Direction of Travel consultation
- The ambitions and priorities of the Council and partner organisations;
- The vision and objectives of our local plan;
- Our ability to contribute to net zero targets;
- National Planning Policy and guidance;
- Our local plan evidence base and an understanding of demographic projections;
- Our Duty to Cooperate position with surrounding local authorities;
- The number of homes we are expected to deliver;
- The amount of employment floorspace we are expected to deliver;
- The housing needs for different groups in our communities;
- The needs of new and existing businesses;
- Existing sites with 'live' planning permission;
- The capacity of our urban and rural areas to accommodate growth;
- The land in our District that is available and suitable to deliver growth;
- The amount of growth that can reasonably be delivered on sites;
- Infrastructure capacity and opportunities to improve infrastructure provision;
- Environmental constraints such as flood risk, landscape and biodiversity;
- The character, heritage and sustainability of our settlements; and
- The Sustainability Appraisal, Habitats Regulations Assessment and Equalities Impact Assessment.

**4.9** Further information on how we have defined our draft spatial strategy are provided in our Regulation 18 **Spatial Strategy Topic Paper (XXX)** as well as our Initial **Sustainability Appraisal (XXX)**. Both of these documents form part of this Regulation 18 consultation and comments are invited to be submitted on these documents. As part of the process, we have tested different ranges of growth (i.e. lower / higher growth) as well as different distributions of growth. This included testing a range of options with infrastructure providers.

### **Draft Spatial Strategy**

**4.10** From the initial spatial strategy options identified, our draft spatial strategy is based upon focusing growth in and around sustainable settlements in the district and to the edge of major towns that lie adjacent to the district (i.e. Eastbourne and Tunbridge Wells), including employment growth within the south of the district (A22/A27 corridor). The draft spatial strategy also seeks to limit growth in those sustainable settlements that are located within or washed over by the High Weald National Landscape designation.

### **Housing**

**4.11** The draft spatial strategy seeks to allocate the majority of growth in and around our market towns and at the edge of regional towns located outside of our District (i.e. Eastbourne and Tunbridge Wells), whilst enabling an appropriate scale of development in a number of settlements where these have a good level of key services and facilities, can access public

transport and have good accessibility to larger settlements. Some growth within our most sustainable towns and villages will support our existing communities, helping to retain and improve essential key services and facilities, as well as support the rural economy through job provision in those locations and by providing local workers to support businesses. A critical mass of development in some of our sustainable villages will also bring forward improvements to infrastructure, services and facilities ensuring that our resident's needs can continue to be met as well as enabling people to continue to live in their communities.

**4.12** The draft spatial strategy takes account of environmental and planning constraints. The majority of Wealden is located within the High Weald National Landscape (53%) and we have a duty to have regard to the conservation of this nationally important historic landscape. The draft spatial strategy therefore seeks to deliver less housing in the High Weald National Landscape, compared with similar sized settlements elsewhere in the district. However, where settlements are considered sustainable, a more limited amount of growth is identified within the High Weald National Landscape to address housing need (including affordable housing need) and to continue to support key services and facilities in these areas. A limited amount of housing within the High Weald National Landscape will also provide a continued labour force to support the rural economy, including tourism. Similarly, the draft spatial strategy also seeks to protect the setting of the South Downs National Park.

**4.13** Outside of the protected High Weald National Landscape, the draft spatial strategy seeks to restrict development in the open countryside to ensure that the character and identity of our settlements are maintained and that our valued landscapes, countryside and open spaces can continue to provide essential ecosystem and agricultural services. This also reduces the carbon footprint of new development in relation to introducing any associated infrastructure and services that would be required in isolated locations, as well as ensuring that new development is located sustainably to reduce the reliance on the private motor vehicle. We provide development boundaries to ensure that development comes forward in the most sustainable locations. Outside of the defined development boundaries, this land will be considered countryside where countryside policies will apply, and development will only be permitted in a restricted set of circumstances in accordance with the policies of this plan and the wider development plan.

### The Economy

**4.14** In terms of the economy, the draft spatial strategy seeks to support the roles of our existing district, service and local centres, providing new homes and communities that will help support and retain high street businesses and services as well as support the overall viability and vitality of our district, service and local centres. As part of this draft local plan, we will provide new employment floorspace, as well as protect our existing employment land and businesses, which will support existing local employers and businesses to maintain and enhance economic prosperity, as well as deliver high quality jobs to attract, retain and grow the workforce. We will also support the tourism industry given its contribution to our economy. The draft spatial strategy seeks to deliver new employment land in sustainable locations and near existing communities but does allow for some economic growth in rural areas. An increase in local employment opportunities in the District will also reduce the need for out commuting and will impact positively on the climate change agenda, by reducing carbon emissions through reducing the need to travel to access employment.

**4.15** Overall, the approach seeks to provide a balance between planning positively to meet development needs including new homes, employment floorspace and community facilities

whilst protecting and enhancing the District's natural and historic/built environment, as well as open spaces.

## Infrastructure

**4.16** Wealden District Council relies on partners to deliver key infrastructure items such as that relating to schools, social and health facilities and water infrastructure for example. Infrastructure has been a key consideration for the draft spatial strategy as detailed in the Regulation 18 **Interim Infrastructure Delivery Plan**. The draft spatial strategy overall seeks to ensure a balanced approach to development, locating development either where there is sufficient capacity to support future growth, or where future growth can best facilitate new infrastructure or infrastructure improvements. The plan also seeks to protect and enhance existing community facilities, as well as provide new community facilities. As the plan progresses, we will continue to work in partnership with infrastructure providers to further test the emerging spatial strategy for the local plan.

## The Concept of 20 Minute Neighbourhoods

**4.17** In the last few years, the concept of '20-minute neighbourhoods' or 'complete, compact and connected neighbourhoods' has been put forward as an approach to help local plans deliver sustainable development. The 20-minute neighbourhood is about creating attractive, interesting, safe, inclusive, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to use day to day. This could include accessing schools, shopping, work, healthcare, recreation, or community facilities. The concept is that these places need to be easily accessible on foot, cycling or via public transport. They also need to be accessible by everyone, whatever a person's budget or physical ability and without having to use a car.

**4.18** The benefits of a 20-minute neighbourhood concept are extensive, providing health, social, environmental and economic benefits to people and communities. Additionally, the concept would seek to tackle many of the issues that we need to address through our plan such as reducing carbon emissions, helping people to become more active, reducing mental health issues and loneliness, improving our town and village centres, making our settlements great places to live as well as improving access to affordable healthy food.

**4.19** Using the 20-minute neighbourhood concept as a tool to deliver sustainable development and support sustainable community living is therefore something we wish to promote and support through the local plan, and we will expect developments to contribute towards achieving this.

**Picture 2 Features of a 20 Minute Neighbourhood**



**4.20** The Town and Country Planning Association (TCPA) has produced a '20 minute-neighbourhoods' guide<sup>11</sup>. The guide sets out how to achieve 20-minute neighbourhoods in existing places as well as when planning large scale developments, providing both guidance and further useful resources. The guide notes that the challenges of implementing a 20-minute neighbourhood will be different in different places and that approaches to achieving a 20-minute neighbourhood and what this may look like once implemented will also be different.

**4.21** As applied to our District, for our market towns, such as Uckfield, Crowborough, Heathfield and Polegate, the aim will be to ensure that the 'town' becomes a complete and compact 20-minute neighbourhood. The Hailsham Neighbourhood Plan has set out a further aspiration for Hailsham to be a '10-minute' town, where people of all ages and abilities can access services and employment as well as easily meet with their friends and family. This plan will also support this.

11 The 20-Minute Neighbourhood, TCPA (March 2021)

## The '20-minute neighbourhoods' concept and rural areas

**4.22** A 20-minute neighbourhood is unlikely to be achievable in all cases for our surrounding villages. However, residents from nearby villages, where this cannot be achieved, would be able to access the market towns via public transport and would be able to walk within the town to access services, facilities and shops to meet their everyday needs, rather than having to travel to a number of different settlements.

**4.23** In more rural areas, the implementation of 20-minute neighbourhoods poses a different set of challenges. For example, public transport provision and road infrastructure may be more limited and there may be less employment opportunities. Housing quality, affordability and isolation from and access to various services may also be an issue, which can affect the health and well-being of people living in rural communities. Where this is the case, the 20-minute neighbourhood concept can still be applied by creating a network of villages that collectively provide for the needs of people's everyday lives, joined by active travel arrangements. This would mean less travel by car to several further afield locations.

**4.24** The TCPA Guide sets out an awareness that active travel in rural locations is often difficult and sometimes dangerous. There are either no or limited pavements and the roads can be used by large vehicles, which may deter cyclists for example. It acknowledges that substantial investment is therefore needed to deliver active travel infrastructure in rural areas and to improve public transport.

**4.25** Whilst the 20-minute neighbourhood within urban and rural areas will look different, it is nonetheless achievable if the framework is there to support it. We will therefore assist in providing a framework through this local plan, aligning with our wider vision and objectives for the District.

**4.26** East Sussex County Council's Local Transport Plan 4 Consultation<sup>12</sup> supports the 20-minute neighbourhood or the 'complete, compact and connected neighbourhood' approach by providing a shift towards supporting healthy lifestyles by walking, wheeling or cycling and more active travel, as well as through the design of public places and healthy places through integrated neighbourhoods.

### Policy SS1: Spatial Strategy for Wealden

- 1 During the plan period up to 2040 the Local Plan will:
  - a) Deliver sustainable and high-quality development that meets the needs of our communities for homes and jobs, whilst balancing the impact of growth on our natural environment, protected landscapes and the countryside.
  - b) Contribute to the continued sustainability of our towns and villages. This will involve supporting the improvements that are required to local services, community facilities and infrastructure. Subject to other policies in the plan, we will safeguard our existing employment and tourism sites and seek to deliver new employment and tourism sites, ensuring that people can access jobs, services and facilities locally.

<sup>12</sup> Local Transport Plan 4 consultation: <https://www.eastsussex.gov.uk/roads-transport/transport-planning/local-transport-plan/local-transport-plan-4>



c) Support our towns and villages to be 'complete, compact and connected neighbourhoods' to help provide health, social, environmental and economic benefits to our communities.

#### Development boundaries

- 2 Subject to other policies in the plan, new development will be permitted within those settlements with an identified development boundary as shown on the Policies Map. This includes the following settlements:

Crowborough, Uckfield, Hailsham, Heathfield, Polegate, Willingdon, Stone Cross, Westham, Pevensey, Pevensey Bay, Forest Row, Horam, Mayfield, Wadhurst, Bells Yew Green, Berwick Station, Blackboys, Buxted, Cross in Hand, East Hoathly, Eridge, Five Ash Down, Framfield, Frant, Groombridge, Hartfield, Herstmonceux, Isfield, Lower Horsebridge, Maresfield, Ninfield and Rotherfield.

- 3 Within these settlements, development proposals should make the best use of previously developed land, apply an appropriate density to its use, ensure the creation of strong, sustainable, cohesive and inclusive communities including required infrastructure provision. Development proposals should also consider land take and the impact this may have on the natural environment and resources, whilst also relating well to the existing and surrounding character of the area.

#### Employment

- 4 The Council will support economic development proposals, which will deliver a growth in high-skilled jobs and an expansion of tourism that contributes towards the delivery of sustainable economic prosperity in the District.
- 5 New strategic employment floorspace will be allocated for development within this local plan and the district's strategic employment sites will also be protected, alongside non-strategic employment land. Improvements to existing strategic employment sites (redevelopment, conversion, upgrading, intensification or reconfiguration) will also be supported where this meets other policies in the plan in order to meet the district's employment need. These sites will contribute to meeting an increase in employment land and jobs within the plan period.

#### Town centres

- 6 The role of our district, service and local centres will be protected and enhanced by encouraging a range of uses consistent with the scale and function of the centre having regard to its position in the hierarchy. Retail growth during the plan period will be focused within these centres in accordance with the town centre hierarchy and policies TC1 (District, Service and Local Centre Hierarchy and 'Town Centre' First Principles) and TC2 (Sequential and Local Impact Test).
- 7 The Council will support improvements to district, service and local centres where this will support the vitality and viability of centres including improvements to the quality of our town centres and public realm, the provision of a diverse offer, the provision of community services, improvements to active travel infrastructure and the night-time economy. Development that is associated with the 'greening' of our town centres will be particularly supported.

#### Countryside

- 8 Land outside development boundaries will be considered as the countryside. The countryside will be protected unless development is supported by a specific policy referenced elsewhere in this plan.

## Question 1

### Consultation Questions

- a Do you agree with draft policy SS1 Spatial Strategy?
- b Is there an alternative strategy that we should be considering through this Local Plan? If so, please set out what the alternative strategy should contain and why.
- c Policy SS1 sets out the approach for development boundaries. Do you agree or disagree with the settlements that are identified to have development boundaries? Please set out your reasoning.
- d The policies maps set out the extent of development boundaries for each settlement identified. Do you agree with the boundaries as drawn? Should any changes be made, if so which settlement and why?
- e Is there anything else within Policy SS1 that we should change? If so, what should we change and why?
- f Have we missed anything? If so, what have we missed and how should it be included?

## Achieving sustainable housing growth

### Wealden housing need

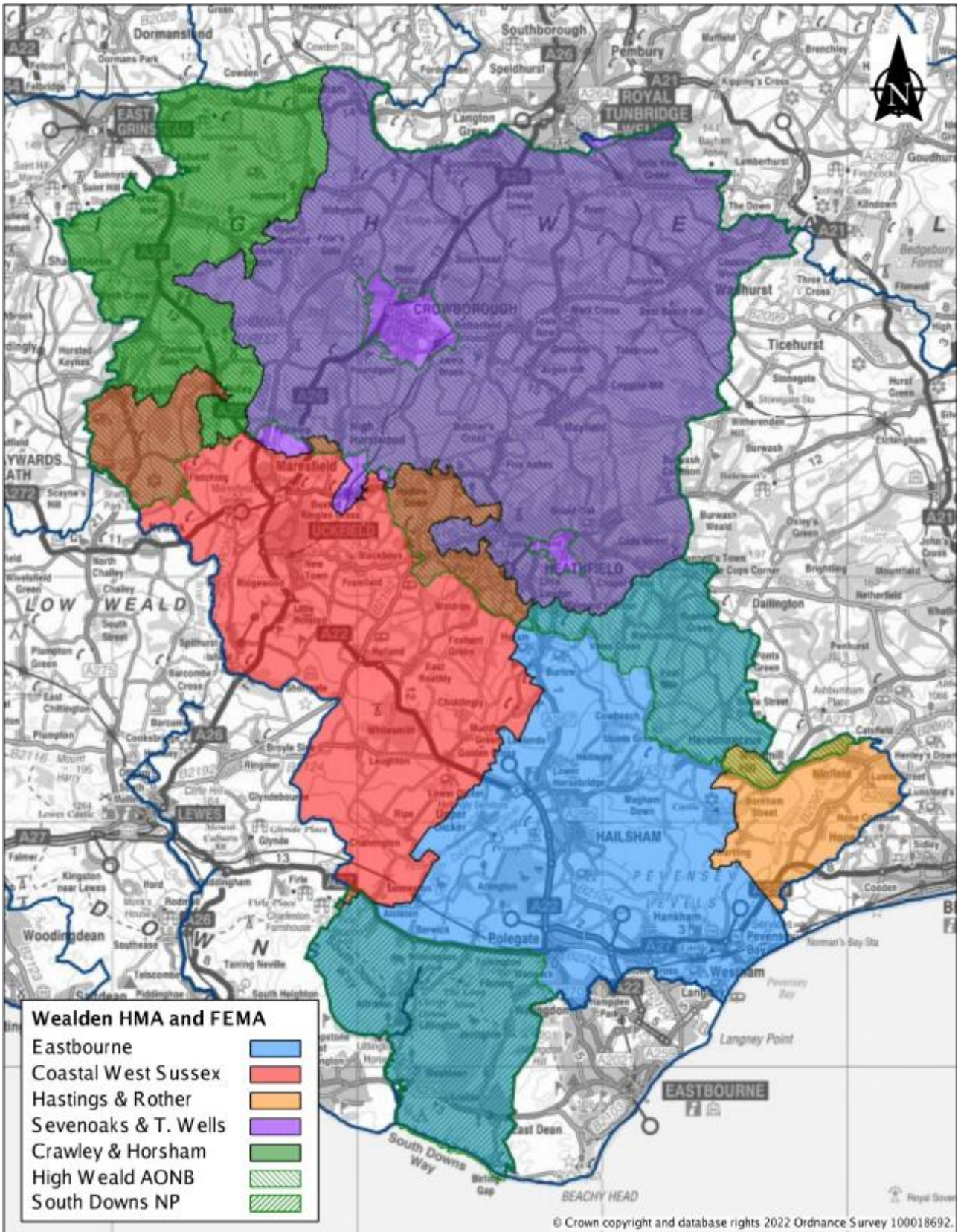
**4.27** A key element of the draft spatial strategy is the provision of a range of new homes in the District. The NPPF requires that a local housing needs assessment, using the standard method in national planning guidance, unless exceptional circumstances justify an alternative approach, should be used to identify the minimum number of homes required. The local housing need calculation for Wealden District is a minimum of 1,200 homes per year. Over the plan period from 1 October 2023 – 31 March 2040 this equates to a district need to deliver 19,800 homes.

### Duty to cooperate and unmet housing need from neighbouring local authorities

**4.28** The NPPF requires for any housing need that cannot be met within neighbouring local authority areas to also be considered in establishing the amount of housing to be planned for. Defining Housing Market Areas (HMAs) is key to this process to understand whether neighbouring authorities have a demonstrable cross-boundary relationship and whether housing is a strategic cross-boundary issue that should be addressed between the authorities. Given the influence of neighbouring and much larger towns outside our District, our LHNA identified that Wealden does not have its own HMA. Instead, Wealden is within the influence of and overlapped by five different HMAs including the Eastbourne HMA, the Sevenoaks, Tunbridge

Wells and Tonbridge HMA, the Coastal West Sussex HMA, the Northern West Sussex HMA and the Hastings and Rother HMA. The HMA boundaries that overlap into Wealden District are shown in the figure below.

**Map 2 Wealden Housing Market Area**





**4.29** In terms of size and influence of the HMAs on Wealden District, both the towns of Eastbourne and Tunbridge Wells, whose urban boundaries border Wealden’s administrative area to the south and north respectively, have the most influence on the District. The geographical area of these two HMAs cover approximately 75% of Wealden District’s population with the Eastbourne HMA covering 41% in the south of the District and the Sevenoaks, Tunbridge Wells and Tonbridge HMA covering 34% in the north of the District. The coastal West Sussex HMA covers 19% of Wealden’s population (around Uckfield), with the Northern West Sussex HMA covering 6% and the Hastings and Rother HMA covering only 2% of the District’s population.

**4.30** In November 2022, Eastbourne Borough Council published a Growth Strategy Consultation under Regulation 18<sup>13</sup>. At this stage, Eastbourne Borough Council determined that they would not be able to meet their own local housing need requirements. The Growth Strategy Consultation indicated that there would be a shortfall of 8,359 dwellings in their plan period, which is equivalent to an average of 418 dwellings per annum (dpa). There is currently uncertainty over Eastbourne’s exact shortfall at this stage as Eastbourne are progressing further work to consider the level of housing they can deliver as part of their local plan process.

**4.31** Tunbridge Wells Borough Council submitted their Local Plan for Examination on 1<sup>st</sup> November 2021<sup>14</sup>. The Local Plan, as submitted, sought to meet the borough’s local housing need requirement. However, following the Inspector’s Initial Findings<sup>15</sup> that identified some concern around strategic sites included in the Submission Local Plan, further testing is now underway as part of the Examination process to consider this issue and the impact on housing provision overall, which is not known at this stage. Other LPAs that neighbour Wealden District who are unlikely to meet their local housing need include Rother, Lewes, Tandridge and Sevenoaks. However, we do not know the extent of unmet need currently and we have not been requested to meet their unmet housing need at this stage. We are also mindful that Wealden does not have as strong a HMA relationship with these local authorities as we do with Eastbourne and Tunbridge Wells, and it is very unlikely that we would be able to deliver the unmet housing need from all our surrounding authorities.

**4.32** The South Downs National Park (SDNP) is not subject to the ‘standard method’ calculation for housing need as outlined in national planning policy guidance, which covers approximately 7% of Wealden District’s geographical area (south of the A27). It is noted that only a small proportion of Wealden District’s population lives within this area and the ‘standard method’ calculation for Wealden has taken account of housing need within the whole of Wealden District. Wealden District Council has therefore addressed housing need in the SDNP as part of this process.

### **Housing evidence base**

**4.33** The LHNA (2021) examines the future need for housing in the District and provides evidence on the types and mix of housing required and considers the need for affordable housing. The study supports the use of the ‘standard methodology’ for deriving the minimum local housing need figure in Wealden District. It also considers that no exceptional circumstances exist as a basis for not using the ‘standard method’ to understand our housing need.

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13 [Eastbourne Local Plan – Growth Strategy, Regulation 18 Consultation, November 2022](#)

14 [Tunbridge Wells Borough Submission Local Plan, October 2021](#)

15 [Examination of the Tunbridge Wells Borough Local Plan: Initial Findings, November 2022](#)



**4.34** As part of the local plan process so far, we have gathered information in relation to understanding how much housing we can deliver in the District within the plan period. The Council has undertaken a proactive approach to identifying opportunities to deliver housing and this is set out in the Regulation 18 **Housing Supply Topic Paper (XX)**. In addition, the Council has been proactive in identifying sites for future development as part of its **Strategic Housing and Economic Land Availability Assessment (SHELAA) (XX)** including a ‘call for sites’ as well as liaising with landowners and site promoters to understand the deliverability of strategic schemes. The SHELAA provides detailed information on the suitability and deliverability of potential sites for housing and other uses taking into account our sustainability appraisal, our Interim Habitat Regulations Assessment and other evidence including landscape assessments, flood risk, infrastructure capacity etc.

**4.35** The work we have undertaken alongside the understanding that we have from our Brownfield Land Register (2023) shows that we have very limited previously developed land (PDL) in the District suitable for housing. This is expected given the lack of industrial legacy in the District and the acute need for employment land that has meant limited opportunities for residential uses on PDL. The Council’s Authority Monitoring Report (AMR) shows that since the 2016/17 monitoring period, the use of PDL for new housing schemes has been below 50%. These sites consist mainly of smaller sites of 4 (net) dwellings or fewer (i.e. windfall sites) and those sites that have existing Permitted Development rights to change to housing (i.e. office to residential use). This means that the majority of new houses have come forward on greenfield land in recent years and that greenfield sites will be required to deliver the quantum of housing needed in the future.

### Sustainable Settlements and the settlement hierarchy

**4.36** As part of the plan-making process we have undertaken work to understand the role and function of the District’s settlements to help us identify those which would be the most appropriate to deliver housing and employment growth through our Draft Regulation 18 Sustainable Settlements Study (XXX). Those settlements with the most services and facilities and a good level of public transport and accessibility are considered to be the most sustainable settlements in the District. This includes Type 1 to Type 4 settlements. These settlements will have a development boundary. The table below identifies the settlement hierarchy for Wealden.

**Table 4 Draft Settlement Hierarchy**

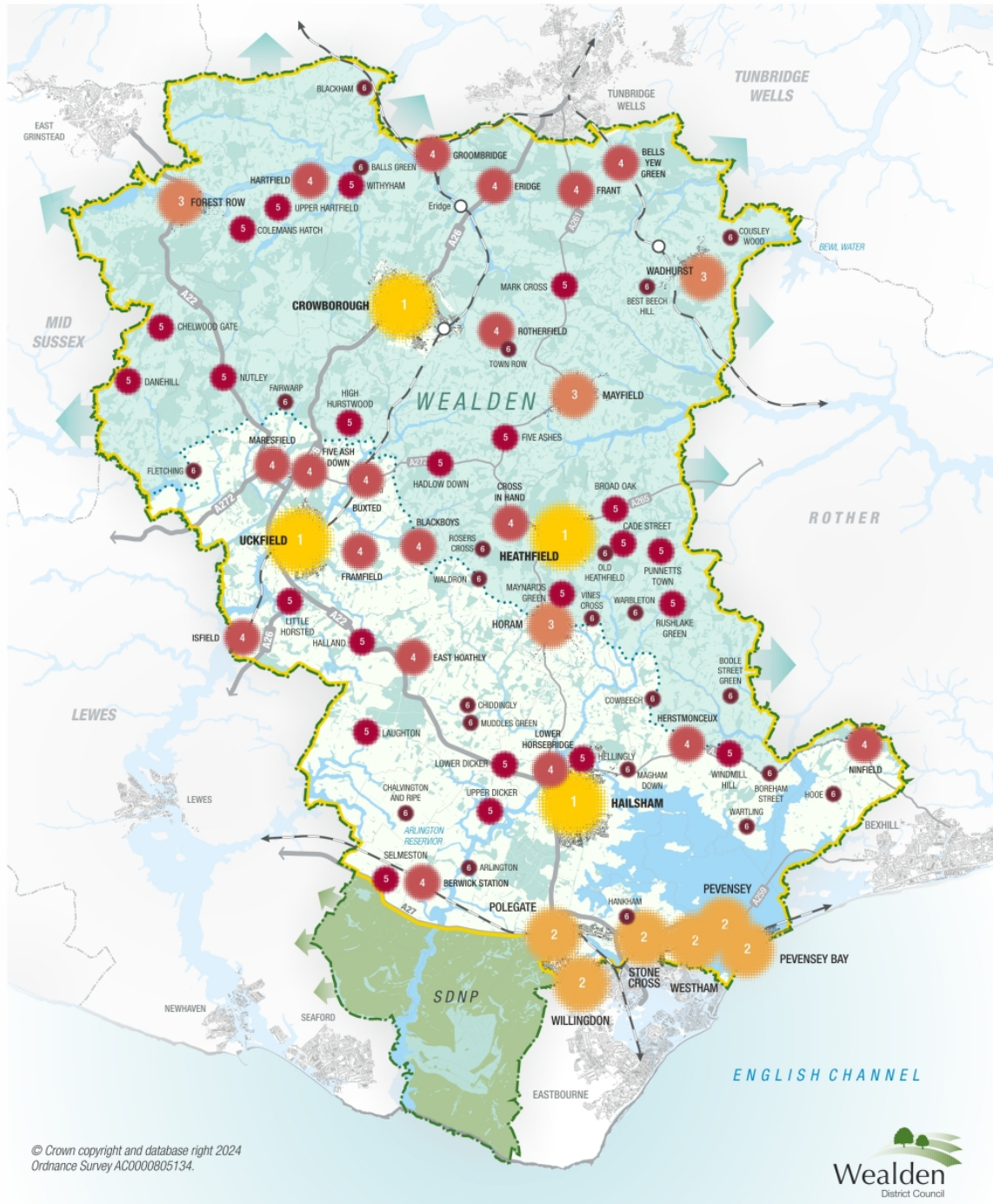
Settlement category	Settlement
Type 1 settlements (Town)	Crowborough, Uckfield, Hailsham and Heathfield
Type 2 settlements (Settlements that geographically relate to a regional centre out with Wealden District)	Polegate, Willingdon, Stone Cross, Westham, Pevensey, Pevensey Bay
Type 3 settlements (Primary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

Settlement category	Settlement
	Lower Horsebridge, Maresfield, Ninfield, Rotherfield
Type 5 settlements (Neighbourhood settlement)	Broad Oak, Cade Street, Chelwood Gate, Coleman's Hatch, Danehill, Five Ashes, Hadlow Down, Halland, Hellingly, High Hurstwood, Laughton, Lower Dicker, Little Horsted, Mark Cross, Maynards Green, NutleyPunnetts Town, Rushlake Green, Selmeston, Upper Dicker, Upper Hartfield, Windmill Hill, Withyham
Type 6 settlements (Residential settlement)	Arlington, Balls Green, Best Beech Hill, Blackham, Bodle Street Green, Boreham Street, Chalvington & Ripe, Chiddingly, Cowbeech, Cousley Wood, Fairwarp, Fletching, Hankham, Hooe, Magham Down, Muddles Green, Old Heathfield, Rosers Cross, Town Row, Vines Cross, Waldron, Warbleton, Wartling

**4.37** The Sustainable Settlement Study and the settlement hierarchy is one of many evidence base studies that we take into account when considering the distribution of future growth and delivering sustainable development. The study in itself does not determine how much growth should be allocated within each settlement as we need to consider many sustainability and planning matters to help us to determine this. For example, the availability of land, environmental constraints such as landscape and flooding as well as physical and social constraints such as the availability of infrastructure to support new growth. All aspects are considered in preparing a local plan, in combination with the Regulation 18 Initial Sustainability Appraisal (XXX) and the Interim Habitats Regulations Assessment January 2024.

**4.38** Further information on how the settlement hierarchy has been identified can be found in the Draft **Sustainable Settlement Study** (XXX)). The settlement hierarchy will be kept under review to ensure that it is based on up-to-date information ahead of the Regulation 19 consultation. We are consulting on our settlement hierarchy as part of this consultation. Therefore, please submit comments if you have any on the Draft Sustainable Settlement Study.

### Map 3 Settlement Hierarchy



**Existing Assets**

- Wealden District Boundary
- Local Plan Area
- Major A Roads
- Minor A Roads
- Rail
- Rail Stations
- Settlements
- South Downs National Park (SDNP)
- Woodland
- Water
- High Weald National Landscape

**Settlement Hierarchy**

- Type 1 - Town
- Type 2 - Urban Settlement
- Type 3 - Primary Village
- Type 4 - Secondary Village
- Type 5 - Neighbourhood Settlement
- Type 6 - Residential Settlement

## Current and future housing supply

### Draft option for the purpose of Regulation 18

**4.39** The extensive work that we have undertaken to inform our Regulation 18 Local Plan consultation provides an overall housing figure for Wealden of 15,729 homes over the plan period. This would achieve an annual target of 953 homes per year. This target includes a windfall allowance of 2,000 dwellings over the plan period. Windfall sites are sites that will deliver development but have not been specifically identified. The **Housing Supply Topic Paper** (XXX) sets out how the windfall allowance has been derived, which in short, is based on our understanding of the average previous housing completions in the District for small sites (sites of 4 (net) dwellings or fewer) that would not normally be identified in the SHELAA process, amongst other matters.

**4.40** At this stage in the plan-making process, there is a shortfall in housing delivery of 4,071 (net) dwellings, which amounts to a shortfall of 247 dpa. This means that the overall housing supply figure for our Regulation 18 consultation is currently a ‘capacity’ based figure, based on the level of housing that can be delivered within the plan period, having regard to the below identified constraints and potential development capacity. Constraints include:

- Potential highways impacts, particularly around the A22 and A26 corridor, which will likely constrain growth in the south and north of the District respectively, particularly around Hailsham and Uckfield and the surrounding areas, accounting for cumulative impacts;
- Flood risk, particularly to the southeast of the District and around urban areas that surround Eastbourne;
- Landscape considerations in relation to the High Weald National Landscape and the setting of the South Downs National Park;
- Biodiversity designations and habitats across the District.

**4.41** The above constraints lead to a lack of deliverable sites in sustainable locations within our District. Further details in relation to these constraints is provided within the **Interim Infrastructure Delivery Plan**, our **Sustainable Transport Evidence Base (STEB)**, the **Level 1 Strategic Flood Risk Assessments** and **Landscape Assessments** that accompany this consultation<sup>16</sup>. Further detailed highways modelling will be undertaken between this consultation and the publication of the Regulation 19 Local Plan.

**4.42** Should our overall housing supply continue to be a ‘capacity’ based figure as we develop the plan further to Regulation 19, it will mean that we are unlikely to be in a position to meet our own housing need or indeed assist our neighbouring local authorities with their ‘unmet’ housing need. However, we will further consider this as we progress the plan accounting for any new sites submitted to us through our second ‘call for sites’ exercise that is running alongside this Regulation 18 consultation and as we test sites and our growth strategy further with infrastructure providers, for example.

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<sup>16</sup> Please see our evidence base webpage: <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/wealden-local-plan/local-plan-evidence-bases/>



**Table 5 Housing supply at the Regulation 18 Draft Local Plan consultation stage**

Source of housing supply	Number of dwellings
Commitments (net) as of 1 October 2023	8,113
Windfalls including suitable SHELAA sites located within development boundaries (not allocated)	2,000
Local Plan draft allocations	5,616
<b>Total housing supply</b>	<b>15,729</b>
Dwellings Per Annum	953

**4.43** In terms of our past housing delivery rate, the Core Strategy (2013) set a housing requirement of 450 dpa and the average delivery rate since 2013/14 has been 709 dpa. To meet our overall housing need requirements as calculated through the standard method would require a substantial uplift in housing delivery from the current position.

## Policy SS2: Provision of Homes

### New homes

- 1 A housing target of 15,729 (net) dwellings will be delivered in the District between 1 October 2023 and 31 March 2040. The provision of homes will be met through committed schemes (with planning permission), site allocations within this local plan and windfall development, as set out in Table 5.
- 2 New housing (allocations and windfall) development is supported in the district's most sustainable settlements and will be located within the defined development boundary areas within the district, as defined on the Policies Map.

## Question 2

### Consultation Questions

- a Do you agree with draft Policy SS2 Provision of Homes?
- 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?

### Distribution of housing growth

**4.44** The distribution of housing growth set out in table 6 below has been defined through our evidence base. The spatial strategy for housing seeks to concentrate the majority of growth in our main towns (Type 1 settlements) and within settlements located in close proximity either

to our main towns or adjacent to Eastbourne and Tunbridge Wells (Type 2 settlements). For other settlements (Type 3 and 4 settlements), a proportion of growth is encouraged taking into account environmental and infrastructure constraints and the location of deliverable sites for housing.

**4.45** Overall, certain settlements within the District have a greater ability to deliver sustainable development than others. For example, both Horam and East Hoathly have a higher potential to deliver growth than other settlements of a similar size owing to their location in the Low Weald, more limited constraints, and connections with higher order settlements. In addition, a quantum of growth in these locations has the potential to deliver wider benefits such as the provision of a new school, and the expansion of existing education provision in these locations, which will address current sustainability issues as well as address capacity issues. New, or expanded school provision in both Horam and East Hoathly will improve the sustainability of both of these villages.

**4.46** A number of Type 1 to Type 4 settlements are located within the High Weald National Landscape. Although these settlements are considered to be sustainable, the suitability / deliverability of sites in these locations is reduced due to landscape sensitivity. Housing delivery in these locations is therefore balanced with the protection of the High Weald National Landscape. This Local Plan includes the allocation of land to the south of Tunbridge Wells, Crowborough, Heathfield, Wadhurst, Frant, Bells Yew Green, Groombridge, Hartfield and Rotherfield.

**4.47** The table below sets out the distribution of housing on a parish-by-parish basis and includes existing commitments, site allocations and the anticipated windfall allowance up to 2040. Further information on sites allocated is provided in chapter 13.

**Table 6 Draft distribution and amount of housing growth up to 2040 on a Parish basis**

Parish	Committed Dwellings (Net) as of 1 October 2023	Local Plan Allocated Dwellings (Net)	Windfall Allowance	Total
Hailsham	1,826	842	291	2,959
Uckfield	941	861	191	1,993
Westham	749	349	99	1,228
Hellingly	787	385	52	1,224
Crowborough	792	147	275	1,214
Willingdon and Jevington	977	0	96	1,073
Horam	130	847	40	1,017
Polegate	372	395	119	886
Frant	247	477	21	745
East Hoathly with Halland	267	400	19	686

Parish	Committed Dwellings (Net) as of 1 October 2023	Local Plan Allocated Dwellings (Net)	Windfall Allowance	Total
Heathfield and Waldron	76	151	155	382
Framfield	141	184	26	351
Maresfield	61	235	46	342
Buxted	103	185	49	337
Herstmonceux	150	9	35	194
Chalvington with Ripe	142	0	12	154
Ninfield	90	20	20	130
Wadhurst	16	20	62	98
Withyham	13	36	35	84
Forest Row	20	0	61	81
Berwick	38	37	4	79
Rotherfield	28	5	42	75
Mayfield and Five Ashes	15	0	51	66
Arlington	34	0	12	46
Hartfield	7	11	28	46
Pevensy	4	0	42	46
Chiddingly	25	0	13	38
Danehill	13	0	23	36
Isfield	4	20	9	33
Fletching	15	0	14	29
Hadlow Down	9	0	10	19
Warbleton	2	0	17	19
Laughton	8	0	8	16
Wartling	7	0	6	13
Long Man	3	0	6	9
Hooe	1	0	6	7
Little Horsted	0	0	3	3
Selmeston	0	0	2	2
<b>Total</b>	<b>8,113</b>	<b>5,616</b>	<b>2,000</b>	<b>15,729</b>

### Further testing of the distribution of housing growth

**4.48** The NPPF requires that local planning authorities should seek to meet their full need for both market and affordable housing as far as is consistent with other policies in the Framework. To inform the Regulation 18 stage, we have tested a number of growth scenarios to understand whether we can meet our housing need requirement and whether certain development sites are likely to be deliverable and can be included in our draft spatial strategy at this stage. As part of this local plan consultation, we are undertaking a further 'call for sites' and we will consider sites submitted and will undertake further testing of those sites already submitted to our SHELAA, prior to publishing our Proposed Submission Local Plan at Regulation 19 stage.

### Land at West of Uckfield

**4.49** A large strategic site has been submitted to the Council's SHELAA at land at West of Uckfield (SHELAA reference 1061/1410). This site has not been included within the Regulation 18 Draft Local plan as further detailed testing is required to understand whether this site is suitable for development and also whether the site would be deliverable within the plan period, particularly around highways capacity. This work has already commenced and will continue alongside the work required to progress the Local Plan post Regulation 18 stage. Should the site be considered deliverable, the site could deliver a range of homes as well as other associated development including new community facilities such as sports facilities, education facilities, employment provision as well as a new green space.

**4.50** Whilst the Council needs to undertake further work to fully understand the implications of this proposal, we are keen to understand the view of our community. Map 4 below sets out a masterplan concept drawing of the site which has been provided by the site promoters. The Council will consider this site further (as set out above) drawing on the further testing that will take place in relation to progressing the Local Plan towards Regulation 19 stage.



## Map 4 Concept Masterplan for Land West of Uckfield - Owlsbury



### Question 3

#### Consultation Questions

- a Do you have any comments at this stage in relation to the site at Land at West of Uckfield – Owlsbury?

#### Gypsy and Traveller and Travelling Showpeople

**4.51** The NPPF sets out the Council's responsibility to assess and plan for the housing needs of all residents. The provision of Gypsy, Traveller and Travelling Showpeople accommodation is a specific community need that the Council has a legal duty to provide in order to facilitate a traditional and nomadic way of life for Gypsies, Travellers and Travelling Showpeople, whilst also respecting the interests of the settled gypsy and traveller community, including promoting social inclusion and ensuring that they have fair and equal access to accommodation that meets their needs.

**4.52** In partnership with Local Planning Authorities across East Sussex (including the South Downs National Park), the Council has recently undertaken a Gypsy, Traveller and Travelling

Showpeople Accommodation Assessment (GTAA) (May 2022). This GTAA shows the level of need for Gypsy, Traveller and Travelling Showpeople accommodation in the District and includes the need as was defined in the Planning Policy for Traveller Sites (PPTS) (August, 2015), which included the need based on a broader 'ethnic' definition and a need based on a 'work' definition. The broader 'ethnic' definition identifies households as Gypsy, Travellers and Travelling Showpeople that would not meet the 'travelling' part of the definition contained with the PPTS (i.e. they have ceased on a permanent basis to travel). This could be due to old age, or childcare responsibilities, for example.

**4.53** The PPTS has since been updated recently (December 2023), with Annex 1 of that document confirming that in determining whether persons are 'gypsies and travellers' for the purposes of planning policy, that consideration should be given to the following issues amongst other relevant matters:

- a whether they previously led a nomadic habit of life;
- b the reasons for ceasing their nomadic habit of life;
- c whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

**4.54** The GTAA identified that Wealden District has the highest Gypsy, Traveller and Travelling Showpeople population within East Sussex, in addition to the largest number of existing plots and pitches. This GTAA shows that for the study period between 2021 to 2040, there is an accommodation need under the 'ethnic' definition of 51 pitches in total. It was also shown that there was accommodation need for three plots for Travelling Showpeople in the District.

**4.55** The Council will seek to undertake further work between this Regulation 18 Local Plan consultation and the Local Plan pre-submission consultation (under Regulation 19) to first consider whether the GTAA evidence base will require an update to account for the recent changes (December 2023) made to the definition of both 'gypsies and travellers' and 'travelling showpeople' in national planning policy.

**4.56** In addition, in terms of site supply, the Council will investigate whether existing Gypsy and Traveller sites could be expanded and other opportunities and locations to address the accommodation needs of the District in full. This will include consideration of existing Gypsy and Traveller sites for expansion, the delivery of 'new' sites on Council owned land, the delivery of Gypsy and Traveller pitches on strategic development sites or through the consideration of submitted sites through the Council's SHELAA process (although this has not to date yielded any sites). The Council will also consider any further sites submitted as part of the 'call for sites' that is taking place alongside this Regulation 18 consultation.

## Policy SS3: Gypsy, Traveller and Travelling Showpeople - Accommodation Needs

To meet the identified accommodation need for Gypsies, Travellers and Travelling Showpeople within the District up to 2040, the Council will make provision for 51 pitches for Gypsies and Travellers and 3 plots for Travelling Showpeople in accordance with the needs identified in the GTAA for those who meet the PPTS definitions.

## Question 4

### Consultation Questions

- Do you agree with draft Policy SS3 Gypsy, Travellers and Travelling Showpeople – Accommodation Needs?
- Should we change anything? if so, what should we change and why?
- Have we missed anything? If so, what have we missed and how should it be included?

### Achieving Sustainable Economic Growth and Increasing Local Job Provision and Skills Town Centres and Retail

**4.57** Our district, service and local centres are vital to the success of this Local Plan as well as the Council's climate change objectives, through the support that they provide to our communities and through the provision of local retail, service and leisure services. The Council's Economic Development Strategy (2023-2033) confirms that a key theme for the strategy is that Wealden's town centres will have to adapt to residents and visitor's needs, providing places to work, socialise and enjoy, whilst optimising dwell time and spend. The Wealden Town Centre Study (2022) has identified that there is only a very limited capacity for new retail floorspace over the study period (2021 to 2039) for both comparison and convenience goods taking into account existing provision and future populations. The table below sets out the recommendations from the Town Centre Study for additional floorspace (for both convenience and comparison goods floorspace) over the study period.

**Table 7 Net quantitative 'capacity' for new retail floorspace in Wealden (2021 to 2039)**

Year	Minimum Floorspace Capacity (Convenience) (sq m net)	Maximum Floorspace Capacity (Convenience) (sq m net)	Minimum Floorspace Capacity (Comparison) (sq m net)	Maximum Floorspace Capacity (Comparison) (sq m net)
2026	600	900	-1,100	-1,600
2031	1,600	2,300	-500	-600
2036	2,600	3,800	600	800
2039	3,300	4,800	1,300	1,800

**4.58** Whilst some limited capacity for retail floorspace is identified, there is a level of uncertainty surrounding these projections in the longer-term and therefore our evidence suggests that we should not allocate land for retail floorspace but should instead focus any additional floorspace coming forward within our District, Service and Local centre boundaries in accordance with our town centre hierarchy (see Policy TC1 of this Local Plan). Furthermore, it was considered within

the evidence base that there was sufficient floorspace at the present time to meet current levels of operator demand and that investment in existing units (including vacant units) and undeveloped sites are needed in any case to support/improve our existing centres. The Council's Town Centre evidence currently takes us to 2039. The Council will update the Town Centre evidence to align with the Local Plan period 2040 to inform the Regulation 19 Local Plan.

## Policy SS4: Retail Provision and Town Centres

The Council will support the provision of between 3,300 sqm and 4,800 sqm of convenience retail floorspace and between 1,300 sqm and 1,800 sqm of comparison retail floorspace by 2040. This will be achieved within our District, Service and Local Centres as defined in Policy TC1.

### Question 5

#### Consultation Questions

- a Do you agree with draft Policy SS4 Retail Provision and Town Centres?
- 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?

### Town Centre Strategy

**4.59** All of our main centres<sup>17</sup>, as part of the Wealden Town Centre Study (2022), were provided with health check assessments, as well as Town Centre and Primary Shopping Area boundaries that were considered alongside the expected capacity for growth in the District for retail.

**4.60** In relation to a town centre strategy, we need to consider how our defined centres can evolve in the space that exists, how we can increase the market share of expenditure in our defined centres and how we can ensure that innovation can take place where it is needed to support businesses and to ensure that our centres continue to be a popular choice for our communities and visitors. An important focus for our town centres will be to deliver opportunities to improve the public realm, where we can, to create attractive spaces for our community.

### The Economy

**4.61** In accordance with the NPPF, a key element of the spatial strategy is the delivery of employment land to meet the needs of the District. The Employment and Economic Study for Eastbourne and Wealden (2022) defines the Functional Economic Market Area (FEMA) for Wealden, identifying Wealden's key and complex interrelationships with neighbouring local

<sup>17</sup> This includes Uckfield, Hailsham, Crowborough, Heathfield, Polegate, Forest Row and Wadhurst.



authorities. The FEMA mirrors the HMA, (Map 2), with the strongest links identified between Eastbourne and the south of Wealden District (Hailsham, Polegate, Willingdon, Westham, Stone Cross and Pevensey) followed by the north of the District (Crowborough, Wadhurst and Heathfield) being associated with Tunbridge Wells.

**4.62** The Employment and Economic Study for Eastbourne and Wealden (April 2022) identifies future employment land needs for both offices (use class E(g)i) and for industrial and warehouse uses (use classes B2 and B8) for the study period. For offices in Wealden, the report identified a recent period of adjustment due to the Covid-19 pandemic that influenced ways of working, but taking a view to 2039, including predicted levels of population growth, it is recommended that some growth in office floorspace was likely to come forward over the period. The study recommends that between 2019 and 2039 that a range of between **3.1 ha and 6.8 ha** is needed for new offices. It was recommended within the Employment and Economic Study that there should be no strategic allocations for offices in the District, as additional floorspace can be accommodated through smaller office provisions/ additions within the existing town centres of the District.

**4.63** In relation to industrial and warehouse floorspace provision, the study has identified a clear need for new sites on the basis of previous completions over the last twenty-year period (2000/01 to 2019/20), which indicates a strong demand for industrial and warehouse units and in considering that the loss of such units has been limited. Overall, the market remains buoyant and requires further industrial developments to meet demand. The table below details the district's overall employment floorspace needs between the 2019 and 2039 study period:

**Table 8 Recommended Employment Need in Wealden Between 2019 and 2039**

	Office Low	Office High	Industrial & Warehouse	Total Low	Total High
Hectares (ha)	3.1	6.8	48.3	51.4	55.1
Floorspace (sqm)	13,140	31,636	196,697	209,837	228,333

**4.64** It is noted that completions (net) for employment uses between 2019 and 2023 period (as of 1 April 2023) totalled 39,439 sqm. This leaves a residual employment need for industrial land needed of 152,831 sqm and a need for new office floorspace of between 17,567 and 36,063 sqm. This figure currently excludes any current commitments for employment uses and this is shown below.

**Table 9 Residual Employment Need in Wealden between 2023 and 2039**

	Office Low	Office High	Industrial & Warehouse	Total Low	Total High
Completions (net) 2019 to 2023 in sqm	-4,427		43,866	39,439	

	Office Low	Office High	Industrial & Warehouse	Total Low	Total High
Residual Floorspace Requirement (sqm)	17,567	36,063	152,831	170,398	188,894

**4.65** We will update our employment figures and evidence base between our Regulation 18 and Regulation 19 stages to align the need with the plan period up to 2040, account for any new information such as commitments and completions as well as 2021 census data.

**4.66** Policy SS5 below sets out the Council's position for the purposes of the Regulation 18 Draft Local Plan consultation. In addition, we will consider the suitability and deliverability of employment sites further between Regulation 18 and the Regulation 19 Local Plan in order to meet our employment need. For further detail please see the 'Further testing' section below.

## Policy SS5: Provision of Employment Floorspace

- 1 The Council will support the provision of at least 84,850 sqm of employment floorspace in use Classes E(g), B2 and B8 by 2040. This will be achieved through the following measures:
  - a) The allocation of land as employment sites as listed within Policy SS 6 Strategic Employment Sites;
  - b) The delivery of existing commitments for employment uses, with the largest commitments (above 5,000 sqm) already identified in Policy SS 6 Strategic Employment Sites;
  - c) The retention of existing employment premises across the district and particularly strategic employment sites identified in Policy EC2: Existing Strategic Employment Sites;
  - d) Supporting existing businesses through the provision of new employment premises/floorspace or the redevelopment, conversion, upgrading, intensification or reconfiguration of employment premises or floorspace on existing employment sites;
  - e) The delivery of new economic development in rural areas in line with Policy EC4 Rural Economy; and
  - f) The provision of new office floorspace (Use Class E(g)(i) within Wealden's designated district, service and local centres.

## Question 6

### Consultation Questions

- a Do you agree with draft Policy SS5 Provision of Employment Space?
- 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?

### Employment provision and the Duty to Cooperate

**4.67** Similar to housing provision, the provision of employment land to meet need is a strategic matter, and we are required to consider whether we can deliver any shortfall from surrounding local authorities who we share a FEMA with. The Eastbourne Local Plan Growth Strategy consultation identified that Eastbourne may have a shortfall in employment provision during their plan period of some 23,184 sqm. At this stage, given that the Council cannot meet its own employment needs, we have not sought to address this unmet need at this stage. However, if this position changes, we will consider whether we can meet any of Eastbourne's unmet employment land need once Eastbourne Borough Council's evidence on employment supply is progressed further. It is noted that Tunbridge Wells Borough Council submitted a Local Plan (October 2021) that looked to meet their full employment needs of 14 hectares. If this level of employment need is taken forward, it will mean that there is no unmet need from the borough.

### Distribution of employment land

**4.68** The South East Local Enterprise Partnership (SELEP) has identified growth corridors/ areas in the South East LEP area. This includes the A22/A27 Eastbourne – South Wealden Corridor, which encompasses both the A27 and A22 within Wealden, including the towns of Polegate, Hailsham and Uckfield (that sit alongside those major road routes), as well as Lewes and Eastbourne outside of Wealden District. The East Sussex Growth Strategy 2013 - 2020, also emphasised support for employment growth along the A22/A26/A27 Eastbourne-Polegate-Uckfield-Crowborough corridor and the Council has seen a number of large employment sites come forward in this strategic employment corridor over recent years (the Ashdown Business Park, Michael Way and the Diamond Drive, Lower Dicker industrial estate). Given the above and the significant need for B2 and B8 employment uses specifically in the District, as demonstrated in the Employment and Economic Study for Eastbourne and Wealden (April 2022), it is clearly imperative that this Local Plan seeks to deliver its larger employment developments within this growth corridor to make best use of those transport connections, which accords with paragraph 87 of the NPPF.

**4.69** Policy SS6 below identifies Wealden's strategic employment allocations, where new employment uses will be supported and safeguarded. In addition, three additional employment sites that are committed sites (i.e. sites with planning permission for employment uses) have been referenced in this policy due to their scale (over 5,000 sqm (net) employment floorspace). All the sites listed within this Policy SS6, once constructed for employment uses, will be considered as strategic employment sites (see Policy EC2 – Existing Strategic Employment Sites). Further information in relation to the sites can be found in the site allocations chapter.

## Policy SS6: Strategic Employment Allocations

- 1 To meet the employment and growth aspirations of the District, the following sites are allocated for business and employment purposes:

Allocations	Employment floorspace (net)
Knights Farm, Lower Dicker, Hailsham	40,000 sqm
Woodside Park, Land East of A22, Hailsham	16,750 sqm

Large Employment Commitments <sup>18</sup>	Employment floorspace (net)
Land at Natewood Farm, Polegate Road, Hailsham	5,999 sqm
Land West of Uckfield, Uckfield	13,495 sqm
Mornings Mill Farm, Eastbourne Road, Lower Willingdon	8,600 sqm

- 2 The sites are allocated to provide employment uses E(g), B2 and B8. Retail uses and other Town Centre uses (excluding offices) will not be permitted at these sites. Once delivered these sites will be considered as strategic employment sites and will form part of the sites listed in Policy EC2 – Existing Strategic Employment Sites. Development must be in accordance with the site-specific requirements set out in the policies of this draft Local Plan.

### Question 7

#### Consultation Questions

- Do you agree with draft Policy SS6 Strategic Employment Allocations?
- Should we change anything? if so, what should we change and why?
- Have we missed anything? If so, what have we missed and how should it be included?

#### Further testing of employment land

**4.70** In a similar vein to housing, the Council has tested employment options with its infrastructure providers and will continue to do so as the plan progresses. A further ‘call for sites’ in order to identify additional employment land (amongst other land uses) is being carried

18 Over 5,000 sqm of employment floorspace (net) in use classes E(g), B2 and B8 with planning permission.

out alongside this Regulation 18 consultation to ensure that sufficient land is available within the plan period to meet our economic needs. In addition, if Eastbourne Borough Council is found to have unmet employment need in the lead up to the Council's Regulation 19 Local Plan, should we have sufficient suitable and deliverable sites we will consider meeting some or all of Eastbourne's unmet employment need.

### **Ashdown Business Park, Maresfield**

**4.71** A large strategic employment site has been submitted to the Council's SHELAA to the south and east of the existing Ashdown Business Park, Michael Way, Maresfield. It is noted also that part of the site submitted to the SHELAA is subject to a planning application currently (see planning reference WD/2022/3319/MAO) for approximately 60,000 sqm of employment floorspace. The site has not been included within the Regulation 18 Draft Local Plan as further detailed testing is required to understand whether this site is suitable for development.

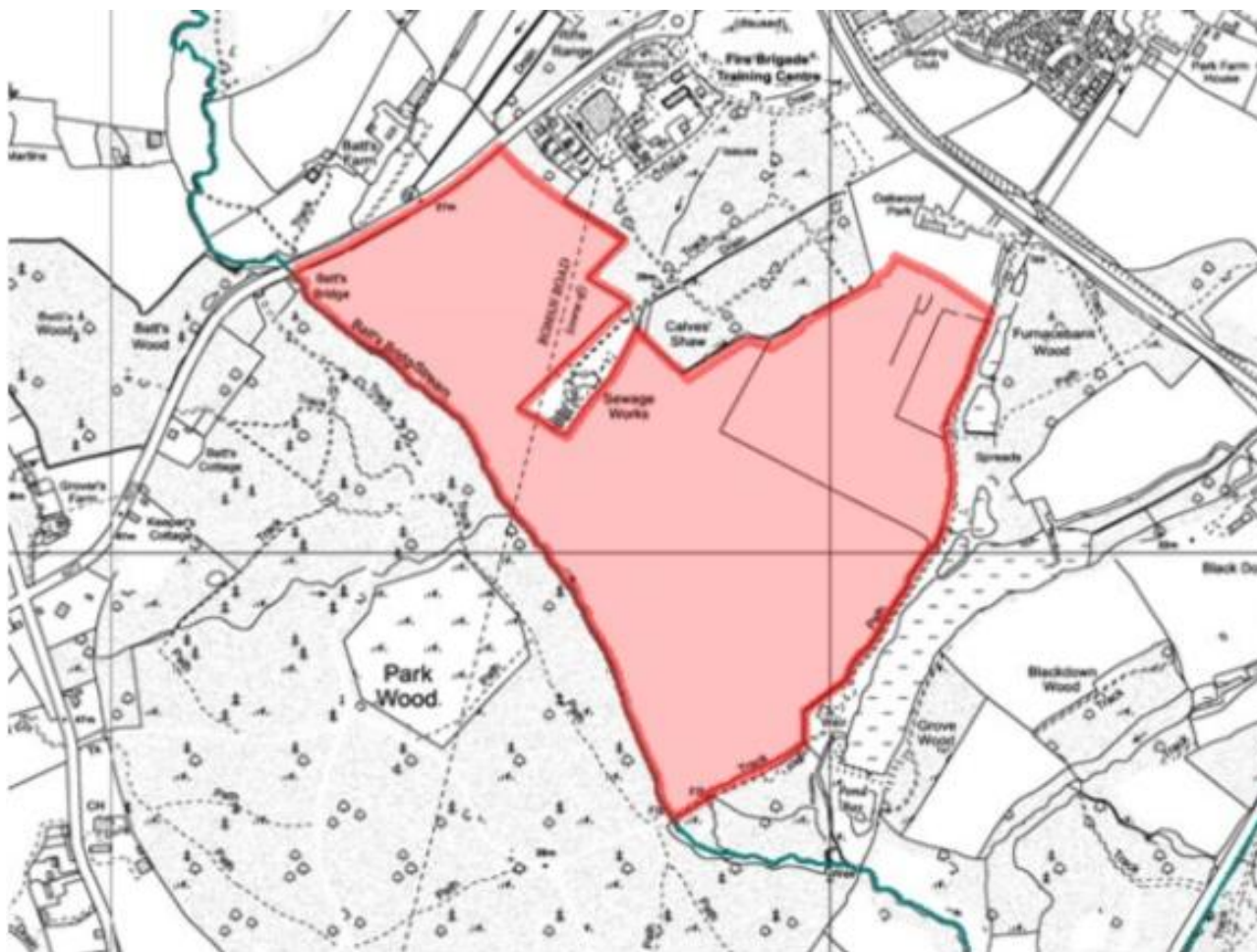
**4.72** Further consideration of the site is required for matters relating to highways, including sustainable transport options, as well as flood risk given that the site is located adjacent to the western boundary of the Batts Bridge Stream, with parts of the site being within Flood Risk Zone 3 (high risk) for fluvial flooding. It is also understood that PFAS contamination may be present on the site. Further work will need to be undertaken to assess any pollution risk and to identify whether potential mitigation is possible.

**4.73** Whilst the Council needs to undertake further work to fully understand the implications of this proposal, we are keen to understand the view of our community. The Council will consider this site further, including further testing that will take place in relation to progressing the Local Plan towards Regulation 19 stage.

**4.74** As discussed above, the Council will also hold a further 'call for sites' in order to identify additional employment land to be carried out alongside this Regulation 18 consultation.



**Map 5 Indicative outline of SHELAA site/s submitted to the Council under the 'call for sites' for Ashdown Business Park, Maresfield (SHELAA references: 980/3120, 720/3120 and 918/3120)**



**Question 8**

**Consultation Questions**

- a Do you have any comments at this stage in relation to the site at Ashdown Business Park, Maresfield?

**Ensuring Comprehensive Development and Housing Delivery**

**Comprehensive Development**

**4.75** The NPPF confirms that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. For some types of larger mixed use, employment or housing development, this may involve bringing together pieces of land in different ownerships to ensure that the range of

needs are met effectively within an overall area. Where a site comprises separate land ownerships, the expectation is that developers and landowners should work positively together to achieve the wider goals of sustainable development. The need to demonstrate that proposals will secure the provision of infrastructure, vehicular access, open space, affordable housing for the whole site (or at least not prevent this from happening in the future) is crucial and is highlighted in Policy SS7 below.

**4.76** The Council also supports the provision of masterplans and design codes in line with Policy DE2: Masterplans and Design Codes of this draft Local Plan. These will help bring forward and co-ordinate the delivery of new sites (allocated or windfall sites).

**4.77** The approach to the mix of land uses on a site should ensure the overall viability of the proposals, but also consider the social, economic and environmental important elements of the scheme. Some elements of the overall scheme (particularly environmental parts) will typically be less commercially attractive but are normally required to ensure the deliverability of the development overall that is sustainable and acceptable in planning terms. In such cases, there may be requirements for those elements of the scheme that are less commercially attractive to be effectively cross funded, normally by the residential or other commercial elements of the scheme.

### Housing Delivery

**4.78** The NPPF supports proposals for housing development which are implemented in a timely manner, and states that local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period (normally three years), where this would expedite the development without threatening its deliverability or viability. The Council will work closely with key partners, developers and landowners to expedite the delivery of housing and to maintain at least a five-year supply of deliverable sites for housing and to meet the overall housing requirement for the District (including its Housing Delivery Test (HDT) measurement). It is noted that both the HDT and five-year housing land supply requirement are under review currently, and if changes are made to either mechanism, then this will be considered at the Regulation 19 stage.

**4.79** The sub-division of larger sites to support the delivery of new homes will only be supported where this expedites the delivery of new homes, and where the delivery requirements of the larger site, for example affordable housing, infrastructure delivery and open space, sports and recreation requirements or the wider objectives of the site are not compromised.

## Policy SS7: Ensuring Comprehensive Development and Housing Delivery

- 1 A comprehensive approach to site development will be expected for all new development, even where sites are in multiple ownership and provide a mix of uses, to ensure the good planning of an area. These principles will be achieved through the following policy measures:
  - a) Support for the provision of masterplans and design codes in line with Policy DE2: Masterplans and Design Codes of this Local Plan to help bring forward and co-ordinate the delivery of sites at scale within the District;

b) Ensuring that the applicant has applied proper consideration to how the policy requirements in this local plan (such as the provision of appropriate land uses, affordable housing, open space/green space, access, sustainable transport, sustainable drainage and other infrastructure etc.) relating to the whole site, with a phasing plan where appropriate, will be achieved;

c) Support for the sub-division of large sites, where this is proven to expedite the delivery of new homes or employment development and where this does not conflict with the comprehensive planning and delivery of the whole site when considered against other policies in this Local Plan; and

d) To assist in making sure that proposals for development are implemented in a timely manner (particularly housing sites), the Council will consider imposing planning condition(s) that require development to begin within a timescale shorter than the relevant three-year period, where this would expedite the development and would not threaten its viability or deliverability

## Question 9

### Consultation Questions

- a Do you agree with draft Policy SS7 Ensuring Comprehensive Development and Housing Delivery?
- 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?

### Supporting Text

**4.80** The sub-division of larger sites to support the delivery of new homes will be supported where all infrastructure requirements of the larger site have been considered and secured, either through a planning condition or a planning obligation. This would include phased developments where there are multiple reserved matters applications. In such cases, it would be expected that the applicant enters into pre-application discussions with the local planning authority to determine the main requirements of the larger site and what is required to be delivered as part of the smaller scheme. The application of this policy will include regard to the provision of appropriate land uses, affordable housing (where applicable), access, sustainable transport, green space/open space, sustainable drainage, and other infrastructure (secured directly or through funding contributions), taking account of the site as a whole. This includes the provision of Suitable Alternative Natural Green Spaces (SANGS) and Strategic Access Management and Monitoring Strategy (SAMMS) where applicable.

**4.81** The Council, in the consideration of imposing planning conditions that require a development to begin with a timescale shorter than the relevant period, will consider whether this can happen without threatening its deliverability and viability and will work proactively with

the developer on this point to ensure agreement between the parties, where possible. The Council will also consider, if a previous planning permission has been granted on the site, the reasons for why that planning permission did not start.

## Climate change

**4.82** Our role in shaping new and existing developments in ways that reduce carbon emissions as well as help our communities to become more resilient to climate change is an important one and addressing climate change is relevant to all sections of the plan. Even with concerted action now, it is recognised that current levels of greenhouse gases in the atmosphere will lead to changes in the climate, therefore there is a responsibility on us all to minimise our carbon emissions whilst ensuring that our built and natural environments and our communities are able to adapt to the expected impacts. Mitigation of, and adaptation to, climate change must therefore be the central consideration for our local plan.

**4.83** As well as taking action to reduce emissions, it will also be important to maximise natural processes that can take carbon out of the atmosphere, known as ‘carbon sequestration’. Green infrastructure and nature recovery will have a major role to play in this, helping to mitigate the impacts of high temperatures, reduce flood risk, as well as address the ecological emergency that has seen a rapid decline in biodiversity. This will also assist to address growing issues with population health and reduced social equality.

**4.84** Some of the necessary actions for tackling climate change, such as improving energy efficiency, ensuring that development is ‘zero carbon ready’ which will help to ensure that, reducing the need to travel, design improvements and increasing the provision of green infrastructure, could have direct benefits for residents by reducing energy bills and providing a better-quality environment in which to live and work.

**4.85** They may also open up business opportunities to help Wealden develop a low carbon economy.

**4.86** The Council is committed to tackling the causes and impacts of climate change, as well as delivering a reduction in the district’s carbon footprint and seeking to become a [net zero carbon district by 2050](#), at the latest, (albeit that this target is currently under review). Policy SP3 sets out how development proposals are expected to contribute to climate change mitigation and adaptation. This policy is supported by a number of more detailed policy requirements presented later in the plan. All developments will be expected to contribute to the mitigation of and adaptation to climate change.

**4.87** We will work with developers, stakeholders and partners to address climate change and to ensure that new developments create places that consider local issues that will contribute to achieving both the Government’s and Council’s net zero targets as well as helping our communities to live healthy and green lifestyles.

## Policy SS8: Responding to Climate Change

### Climate change mitigation

- 1 Development proposals will be expected to deliver best practice and, where possible, innovative and creative solutions to mitigate climate change, contributing to meeting



nationally binding targets to reduce greenhouse gas emissions and Wealden becoming a net zero district, as soon as possible.

- 2 Support will be given to development proposals that help mitigate climate change and consideration will be given to how development proposals:
  - a) Reduce heat and power demands of the development;
  - b) Improve energy consumption through energy efficiency measures;
  - c) Incorporate decentralised, renewable and low carbon energy solutions;
  - d) Re-use buildings, materials and minimise the impact of waste and the use of natural resources;
  - e) Improve the energy performance of any existing buildings;
  - f) Incorporate sustainable design and construction techniques including those relevant to whole life net zero carbon in the construction and operation of buildings and ensuring that development is zero carbon ready;
  - g) Sequester carbon through land management opportunities, woodland creation, tree planting and / or any other innovative ways to capture carbon in the environment;
  - h) Support landscape scale approaches to nature protection and recovery e.g. supporting the Weald to Waves Nature Recovery Corridor<sup>19</sup>;
  - i) Support regenerative farming and the protection of soil health;
  - j) Support well-connected communities in relation to their location to services, facilities, education, public transport and jobs, supporting a reduction in vehicle use (number and length of journeys) and avoiding car dependent behaviours;
  - k) Support and deliver the improvement of walking and cycling routes, and access to public transport and transport sharing schemes;
  - l) Support behavioural change to enable people to play their part in addressing climate change;
  - m) Enable home working through digitalisation and broadband;
  - n) Incorporate electric charging facilities and support the take up of electric vehicles;
  - o) Achieve improvements in local air quality;
  - p) Support low carbon farming (agricultural and horticultural) practices to increase productivity and carbon off-setting opportunities; and
  - q) Incorporate well-designed green infrastructure to mitigate climate change and to deliver multiple-benefits.

#### Climate Change Adaptation

- 3 Development proposals will be expected to protect people and nature through climate change adaptation and measures to improve climate change resilience. Support will be given to development proposals that promote and assist climate change adaptation and reduce the negative impacts of climate change. Consideration will be given to how development proposals:

19 Weald to Waves: Connecting nature across Sussex. Available at: [www.wealdtowaves.co.uk](http://www.wealdtowaves.co.uk)



- a) Incorporate design features and use construction materials to ensure that a building provides resilience and resistance to climate change;
- b) Are designed appropriately in relation to layout and construction materials, prioritising passive cooling and reducing the potential for overheating;
- c) Minimise water and resource consumption;
- d) Take account of flood risk and coastal change through their location and design;
- e) Integrate sustainable drainage systems, to minimise and control surface water run-off, provide flood storage capacity and improve habitats and species migration;
- f) Incorporate green infrastructure to help species adapt to climate change through preventing fragmentation or isolation of habitats and reducing risks such as flooding and the overheating of urban environments;
- g) Improve habitats for nature and wider environmental benefits generally, but especially within local nature recovery networks (once these are confirmed).

## Question 10

### Consultation Questions

- a Do you agree with draft Policy SS8 Responding to Climate Change?
- b Do you feel the strategic policy covers the key issues we need to address in our approach to climate change adaptation and mitigation?
- 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?

## Health and Wellbeing

**4.88** Many of the circumstances that affect our mental and physical health, wellbeing and quality of life are found outside the medical system. The physical environment we live in, and our socio-economic status make up over 60% of the factors that impact upon our health outcomes<sup>20</sup>. These physical factors include the design and quality of an area which can be influenced by strategic and development policies.

**4.89** The built and natural environment is a key environmental determinant of health and wellbeing. The 'built and natural environment' refers to the characteristics (objective and subjective) of a physical environment in which people live, work and play, including schools, workplaces, homes, communities, parks, and recreation areas including green and blue space. Therefore, creating places that are better for people and nature is key to ensuring physical and mental health and wellbeing for those who live and work in the District.

20 Department of Health and Social Care, (2019), Advancing our health: prevention in the 2020s

**4.90** The inclusive design and quality of a development will shape how people live their lives. Therefore, by prioritising the principles of the 20-minute neighbourhood concept to create “local living”, we can ensure a positive impact on the health and wellbeing of our residents, enabling them to live healthier lifestyles.

**4.91** The Public Health England (PHE) paper Spatial Planning for Health: An evidence resource for planning and designing healthier places (2017)<sup>21</sup>, identifies the following key principles for building healthy neighbourhoods:

- a ‘Enhance neighbourhood walkability’ - by improving street connectivity, mixed land use and a compact residential design.
- b ‘Build complete and compact neighbourhoods’ - which consider proximity to services, topography, and distance to recreation facilities.
- c ‘Enhance connectivity with safe and efficient infrastructure’ - with the provision of cycling and walking infrastructure alongside public realm improvements such as street lighting.

**4.92** The design of a neighbourhood can produce a sense of belonging whilst contributing to the health and wellbeing of the people that live within it. Certain aspects with neighbourhood design can maximise opportunities for social interaction and active travel, thereby impacting on our day-to-day activities and subsequently our health behaviours.

**4.93** The East Sussex County Council Joint Strategic Needs Assessment (JSNA)<sup>22</sup> in conjunction with work undertaken with the County Council and neighbouring authorities has identified our health and wellbeing challenges. The specific health and wellbeing needs of the District vary from location to location however the areas of key concern are:

- the high levels of adult obesity;
- the increasing levels of older residents and those living with long term illness and disability;
- the high percentage of car users over other healthier forms of travel;
- access to primary healthcare including GP’s and NHS Dentists; and
- our identified deprived communities within eastern Hailsham and the north west of Uckfield.

**4.94** To ensure we maximise the impact spatial planning can have on our day to day living circumstances our policy for Health and Wellbeing and Quality of Life seeks to ensure that our approach within the local plan is a holistic one.

**4.95** Excellent health, wellbeing and quality of life must be considered from the outset of the planning process (pre-application stage) and we will engage with developers, stakeholders, and partners to facilitate change across the District to achieve both the Government’s and Council’s visions.

**4.96** This strategic policy and subsequent planning policies will enable the creation of a living and working environment within Wealden that sets the health and wellbeing of our residents at the heart of all our planning decisions.

### **Health Impact Assessments (HIA)**

**4.97** Health Impact Assessments (HIA) enable local action on the wider determinants of health by putting people and communities at the heart of the process. They help maximise the

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21 The Public Health England (2017) Spatial Planning for Health: An evidence resource for planning and designing healthier places. Available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729727/spatial\\_planning\\_for\\_health.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf)

22 ESCC Joint Strategic Needs Assessment – Wealden District Profile. Available at <https://www.eastsussexjsna.org.uk/area-profiles/wealden-district-area-profile/>

health benefits of development and minimise the potential harms, while maintaining a focus on reducing inequalities in compliance with the Health and Social Care Act 2012.

**4.98** The aim of the HIA is to identify the health and wellbeing impact or cumulative impacts from a specific development or developments and provide recommendations to mitigate for any negative or unintended outcome.

### When to use an HIA

**4.99** Health Impact Assessments (HIA) of a proportionate level will be required for all major applications and development that is likely to give rise to significant health impacts. These will include:

- Major developments of 30 dwellings or more and / or 1000sqm of employment floorspace and major infrastructure;
- Development which includes uses for education, health and social care, leisure or community, hot food takeaways and other food retail and betting shops;
- Development within areas of high deprivation, fuel poverty, poor health, elderly or vulnerable groups and high levels of childhood and /or adult obesity using the PHE (Public Health England) Wider Determinants tool.

**4.100** The three levels of HIA are broken down as follows:

- **Comprehensive** HIAs are more in-depth and so are the most resource intensive, requiring extensive literature searches and data collection, and stakeholder and public engagement - this type of HIA is most suited to more complex proposals;
- **Rapid** HIAs involve a brief assessment of health impacts, including a literature review of quantitative and qualitative evidence, and the gathering of knowledge and further evidence from local stakeholders - rapid HIAs usually include the establishment of a small steering group and carrying out a stakeholder workshop;
- **Desktop** HIAs can encompass engaging a small number of participants using existing knowledge and evidence to undertake the assessment of health impacts.

**4.101** The level of HIA required will be determined from a screening stage which will offer a systematic way of deciding whether a full HIA is required. The screening process should be prepared in advance of the pre-application stage by the applicant to facilitate initial discussions. In practice adopting the appropriate level of HIA will depend on the focus, scale and scope of the development, its location and the surrounding areas level of deprivation, as well as its potential impact in combination and / or cumulatively on the existing community.

**4.102** It is essential that discussions of the level of HIA are undertaken during earlier stages of the application process to ensure that the HIA provided is appropriate for the type of scheme proposed.

## Policy SS9: Health, Wellbeing and Quality of Life

- 1 The Council will expect new development to be designed to achieve healthy, inclusive and safe places that promote, support and enhance physical and mental health and well-being and therefore contribute to reducing health inequalities within the District.

Development must support and address the health and wellbeing needs in Wealden as identified in the Joint Strategic Needs Assessment.

- 2 To maximise opportunities for health and wellbeing benefits and to enable healthy lifestyles, development (as proportionate to the type and scale of development proposed) must demonstrate how it will:
  - a) Provide high quality, well designed, safe and accessible developments for all age groups and abilities, creating a beautiful and healthy living environment and a distinctive place to live and / or work;
  - b) Create integrated neighbourhoods that improve connectivity with the wider natural and built environment and to key services;
  - c) Deliver good accessibility routes for all users through the provision, improvement or enhancement of well-connected streets and path networks, to enable active and sustainable travel, increasing physical activity and contributing to the creation of sustainable neighbourhoods;
  - d) Provide opportunities to facilitate community cohesion and social inclusion, locating community facilities or spaces for people to meet and socialise in the best location for those walking, cycling, wheeling or using public transport;
  - e) Provide a network of different types of spaces, incorporating multifunctional green infrastructure and access to nature, as well as enabling climate change resilience;
  - f) Provide high quality private space as well as high quality inclusive public spaces;
  - g) Support and facilitate healthy eating and food security through the provision of food growing opportunities such as allotments, orchards or community growing spaces as well as supporting local food production and markets;
  - h) Take opportunities to improve the factors that can contribute to poor health and social inequalities such as noise, vibration, air quality, crime, local amenity, water pollution, deficiencies in open space, recreation and sports facilities and access to the countryside; and
  - i) Contribute towards local labour training, placements / apprenticeships to improve skills to help tackle worklessness, especially for young people.

#### Health Impact Assessment

- 3 To support this policy requirement, all major development proposals between 30-149 residential units and / or commercial development of 1000 – 9,999sqm will be expected to submit an HIA screening assessment. This should be submitted at the pre-application stage to determine the level of HIA required proportionate to the proposed development.
- 4 The requirement for screening will also apply to smaller-scale developments where there are reasons to indicate that a proposal may give rise to a significant impact on health, especially where the development is located in within the one of the 20% most deprived wards or where there are high levels of childhood and / or adult obesity.
- 5 All major development proposals of or over 150 residential units and/or 10,000sqm floorspace will automatically require an HIA to be undertaken to demonstrate both the individual and cumulative impacts of the proposal on the health and well-being of the community.



- 6 Where a HIA is required the process must commence at the initial stages of the development so that it can inform the proposal, this will allow maximum scope for the health issues to be identified and addressed as the proposed scheme is progressed. The Council will agree timescales and stages with the applicant. An HIA should be undertaken in accordance with the East Sussex HIA Guidance (once published and any subsequent updates to it) which will set out details on required processes.
- 7 The HIA recommendations should be incorporated into the proposal and submission documentation, these must demonstrate how any harmful impacts on health and wellbeing have been mitigated and how positive impacts have been maximised. An HIA report appropriate to the stage of the proposal will be required for full, outline and reserved matters applications as agreed with the Council.

## Question 11

### Consultation Questions

- a Do you agree with draft Policy SS9 Health, Wellbeing and Quality of Life?
- b Do you agree with the threshold levels set out within the policy for undertaking a Health Impact Assessment (HIA) in the Wealden context?
- c If you disagree with the threshold levels set out in the policy, at what level do you think an alternative threshold should be set and why?
- d Have we missed anything that may impact on the health and wellbeing of our residents? If so, what have we missed?
- e Should we make changes to this policy, and if so, what changes should we make?

### Increasing the provision of sport and leisure facilities

**4.103** Development of a sports hub facility to deliver new sport and leisure provision on the edge of Hailsham to the west of Lower Horsebridge within the Parish of Hellingly (known as Knights Farm West) will meet some of the identified shortfall in provision across the district. This site is currently subject to a planning application which is due to be considered at Planning Committee in January 2024<sup>23</sup>. The proposal seeks to deliver a range of sport and leisure facilities including:

- 2 x Full size 3G floodlit pitches
- Dedicated toilets and 4 x changing rooms
- 4 x dual floodlit tennis / netball courts
- 2 padel tennis courts
- Community café with multi-purpose room
- Skate park

23 Planning Committee South Agenda Papers: <https://council.wealden.gov.uk/ieListDocuments.aspx?CId=660&MId=5535&Ver=4>.

- Childrens play area
- Table tennis tables
- Walking, running and cycling route
- Picnic areas
- Associated parking

**4.104** The delivery of new sports and leisure facilities will bring many benefits for the District and its residents. As noted above, the site will help to address sports and leisure provision deficits in the district as identified by the Council's open space<sup>24</sup> and playing pitch<sup>25</sup> evidence base. The facilities will contribute to opportunities for increased healthy living, improving the lives of our residents and increased opportunities to take part in sport and leisure locally. Development Management policies for the provision of open space, sports and recreation provision are provided in Chapter 9.

### Green Infrastructure

**4.105** Green infrastructure (GI), as defined in the NPPF is 'a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity. Green infrastructure and the benefits it can deliver falls within many of the Local Plan's strategic objectives and is a fundamental part of sustainable development.

**4.106** The district has a significant amount of green and blue (water) spaces. These include open spaces such as parks and gardens, allotments, woodlands, fields and hedges, farmland, rivers, lakes and ponds, sports and playing fields, cemeteries and churchyards, footpaths and cycleways and biodiversity designated sites and priority habitats<sup>26</sup>, to name a few.

**4.107** GI can help to maintain critical ecological links between town and country connecting important areas of wildlife habitat and enabling species to move between them. GI provides us with essential ecosystem services such as flood protection, clean air and water, carbon storage, food, materials and can assist with climate change adaptation. It also provides us with access to the wider countryside, providing health and well-being benefits through opportunities for walking, cycling and other activities, as well as contributing to the economy through the creation of attractive environments which can attract business.

**4.108** Given its multi-functional benefits, delivering GI is an important focus of this local plan and is central to achieving many of the plan's objectives. Natural England published a [Green Infrastructure Framework](#) in January 2023. Publication of the framework is a commitment within the Government's 25 Year Environment Plan and if implemented will support the greening of our towns and the connections with our surrounding landscape. The Framework acknowledges that there are opportunities to improve our green and blue assets, ensuring that they are managed in a way that supports the local environment and deliver a wider range of benefits for nature and people. The Framework comprises a set of principles and standards, mapped datasets to support the standards, and practical advice and guides on how to design good GI and apply the Framework.

24 WDC (2022) Open Space Report. Available at <https://www.wealden.gov.uk/UploadedFiles/Wealden-Open-Space-Report-26.05.22.pdf>

25 WDC (2022) Playing Pitch and Outdoor Sports Strategy – Assessment Report. Available at <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-evidence-base/open-space/>

26 Priority habitats are Habitats of Principal Importance (HPI) under Section 40 of the Natural Environment and Rural Communities Act 2006, as amended. HPIs were first identified as priority habitats in the UK Biodiversity Action Plan.

**4.109** In 2017 we developed a GI study. The study identifies the district's GI assets and identifies gaps in the network and the components and opportunities for improvement, having regard to factors such as accessibility, existing open spaces, natural and semi-natural habitats, protection of the water environment, landscape and geodiversity, and contribution to ecological networks. The study also provides GI design guidelines.

**4.110** In general terms, there are many opportunities to improve, enhance and create key strategic GI assets and components across the district as well as making a difference at a site scale. In the coming months we will be progressing work on a GI Strategy, aligning this with legislative changes that have taken place more recently such as the Environment Act 2021, national policy and guidance and Natural England's Green Infrastructure Framework. The GI Strategy will support the next stage (Regulation 19) of the Local Plan process and will provide a local framework for GI delivery across the district during the plan period. This will provide a clear strategy for green infrastructure provision and enhancements. GI will be considered at the beginning of and throughout the development process.

## Policy SS10: Green Infrastructure

- 1 Where relevant, all development should protect, improve and enhance existing green infrastructure and, where opportunities exist, create additional green infrastructure that will play a meaningful role in the creation of a multi-functional and accessible network of GI across the district. New and the improvement of existing GI should be designed to provide benefits for the environment and people, supporting health and well-being and contributing to the response to climate change.
- 2 When determining planning applications, consideration will be given to how development proposals:
  - a) Embed green infrastructure into the design and layout of the proposal taking into account locally distinctive character and creating a sense of place;
  - b) Protect, retain, enhance, create and regenerate green corridors and links that contribute to the network, in particular, supporting ecological connectivity for wildlife between the development, town and village centres and the wider countryside;
  - c) Maximise opportunities to enhance ecosystem services;
  - d) Address any green infrastructure deficiencies in the area;
  - e) Support the delivery of the Council's GI Strategy<sup>27</sup>;
  - f) Maximise opportunities to provide multi-functional benefits including providing opportunities for people to interact with nature and encourage recreation, sports and healthier lifestyles, ensuring that opportunities will not cause harm to wildlife and habitats;
  - g) Secure improved access to green infrastructure for residents of all ages and abilities. This may include improving rights of way, walking and cycle routes and networks and providing informal access, where this will not cause harm to biodiversity, landscape or heritage assets;

27 This will be progressed for the Local Plan Submission.

- h) Incorporate measures for adapting to and mitigating against the effects of climate change through innovative green infrastructure design solutions that will complement the provision of sustainable drainage, the management of flood risk and urban cooling;
  - i) Where appropriate, provide opportunities for growing healthy food, including through allotments and other community schemes;
  - j) Incorporate green infrastructure to support economic growth and sustainable tourism;
  - k) Propose to manage and maintain the provision of green infrastructure; and
  - l) Comply with any national green infrastructure standards.
- 3 Relevant development proposals must secure positive green infrastructure outcomes and will be supported where they contribute to all of the below (as relevant):
- a) Development is designed to respond to the location of existing green infrastructure and support and improve its functions and benefits;
  - b) A proposal protects and improves the green infrastructure network through enhancement and/or regeneration; and
  - c) Proposals provide new green infrastructure and / or introduce multifunctional uses, green links and corridors.
- 4 Where the scale of development is too small to accommodate on-site provision of green infrastructure or where the development is for the re-use of existing buildings, opportunities should still be sought to maximise opportunities for GI. This could include but is not limited to the following measures, green roofs, walls and nesting and roosting spaces for wildlife.

### Supporting text

**4.111** There are clear connections / overlaps between GI and BNG within the planning environment. GI can contribute to BNG under certain circumstances, and this is accounted for within the Defra Metric for BNG provision. For example, a green space managed for its recreational or amenity value is unlikely to add value or uplift to BNG, scoring low within the metric, but would contribute towards a multifunctional GI network. However, if the BNG proposed is the creation of a native, species rich hedgerow, which is managed to achieve good condition (as set out in the metric), within a site, then this would contribute to the GI network as well as providing BNG value.

### Question 12

#### Consultation Questions

- a Do you agree with the Council's draft Policy SS9 for Green Infrastructure?
- b Do you feel the strategic policy covers the key issues we need to address in our approach to the retention, protection, enhancement and creation of green infrastructure?



- 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?