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1 Introduction

1.1 Wealden is a large rural district characterised by a dispersed settlement pattern. The District’s main centres generally serve the shopping, service and employments needs of their local resident populations, as well as tourists and visitors to the area. However, the District’s Town Centres have not grown to be significant centres in the South East. This is mainly explained by their proximity to a number of higher order shopping, service and employment centres on the edge of the District, principally Eastbourne to the south and Royal Tunbridge Wells to the north. The High Weald Area of Outstanding Natural Beauty (AONB) and the South Downs National Park, along with internationally important ecological conservation areas at Ashdown Forest, Lewes Downs (outside the District) and the Pevensey Levels, have also restricted the location and scale of new development in the District.

1.2 The District is generally characterised as having an affluent population and low crime rates, although there are inequalities across the District. For example there is a sharp contrast between high and low incomes, and there are strong geographical disparities, with higher average incomes in the north contrasting with lower incomes around Hailsham and Polegate in the south. The population is also ageing, meaning that the District is reliant upon in-migration, assisted by new housing, to sustain and grow its local economy and town centres. The fact that half of the District’s population live outside the towns in more rural areas also creates particular challenges for access to shops and services in the main settlements.

1.3 The challenge for the Council therefore is to focus growth where it is most accessible and sustainable, whilst maintaining the balance between rural settlements and larger service centres. It is recognised that some settlements, while having limited opportunities to accommodate significant growth, could support some development to meet the needs of the community. However, in other settlements, in less sustainable locations, additional growth will simply encourage more travel and out commuting and the potential for increasing social inequality. Notwithstanding this, it is recognised that residents will still look to other centres outside of the District for employment, leisure, recreation and healthcare.

Executive summary

1.4 This report contains a series of recommendations, including reclassifications within Wealden’s Town Centre and Retail Hierarchy. This aligns the designations with definitions in the National Planning Policy Framework (NPPF) published in March 2012. Recommendations for the emerging Wealden Local Plan is that there should be 4 town centres namely: Hailsham, Uckfield, Crowborough and Heathfield, and 3 District Centres: Polegate, Wadhurst and Forest Row. There are also a number of local centres helping to meet the needs of villages, including Pevensey Bay, Mayfield, Horam, Herstmonceux, Stone Cross and Rotherfield. These smaller settlements have been assessed in more detail within this background paper to ensure they meet the requirements of the NPPF, in being an important local retail centre. The Town Centre and District Centre designations have been subject to a detailed review in the Town Centre and Retail Study (2016), and
have been justified as appropriate designations based on their status and function within the retail hierarchy.

1.5 The Retail Study (2016 and 2017 addendum) shows that the retention of all food shopping trips and expenditure in the Heathfield, Uckfield and Crowborough settlements is strong at between 77.1% and 88.8%. This indicates that the towns have relatively good provision of in-centre and out-of centres stores, supermarkets and smaller convenience stores that are meeting the needs of their catchments. In Hailsham there is good choice of superstore provision, but overall retention is lower at 57.7% because of the strong draw from Eastbourne as a Regional Centre.

1.6 To meet the needs and demands of both comparison and convenience retail floorspace a Local Plan policy has been prepared outlining the distribution of retail floorspace between the major settlements, as well as providing a specific policy for each of the Town Centres, stating their boundaries and where relevant primary and secondary retail frontage. This document provides the assessment of the retail boundaries from the Issues and Options stage of the Local Plan through to the Proposed Submission version of the Wealden Local Plan to be published in August 2018, highlighting any changes in the boundaries and primary/secondary retail frontage.

1.7 The document concludes with an assessment of the Local Centres and a justification of why they should or should not be included as part of the local retail hierarchy. Many other settlements were assessed for their retail importance, but were of smaller, more local significance and as such have not been designated as part of the local hierarchy. This is discussed in the Local centre section of the report.
2 NPPF Requirements

2.1 The National Planning Policy Framework (NPPF) (March 2012, Paragraph 23) states that when drawing up Local Plans, Local Planning Authorities (LPAs) should amongst other considerations:

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- define a network and hierarchy of centres that is resilient to anticipated future economic changes;
- define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;
- promote competitive town centres;
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
- allocate a range of suitable sites to meet the scale and type of retail and leisure development needed in town centres;
- ensure that the needs for retail and leisure are “met in full” and “not compromised by limited site availability”. Assessments should therefore be undertaken of the need to expand town centres to ensure a sufficient supply of suitable sites;
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
- recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and
- where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.

2.2 The underlying objective of both national and local policy is to direct new development and investment to town centres first. In this context the Town Centre and Retail Studies (Stages 1-3) will provide the robust evidence base in accordance with the NPPF.

2.3 It is important to define the extent of town centres and their associated primary and secondary frontages, making it clear which uses will be permitted in such locations. They are required to retain and enhance existing markets and where appropriate re-introduce or create new ones, ensuring that markets remain attractive and competitive with a range of suitable sites to meet the scale and type of development needed in town centres.

2.4 The NPPF is clear that town centre uses such as retail, restaurants, cafes, bars and leisure activities such as cinemas, indoor bowling should be contained within town
centres. These uses help to create a vibrant sustainable centre. The NPPF has the following definitions:

- **Main Town Centre uses** - Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities; the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

- **Primary shopping area** - Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

- **Primary and secondary frontages** - Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

**Primary Frontages**

2.5 Primary frontages are at the heart of the centre, they contain streets that are dominated by shops and have the greatest pedestrian footfall. It is important to retain the function of the Primary Shopping Frontages as dominant shopping areas, as large numbers of shops in close proximity to each other are important to the attractiveness of the centre and its convenience to shoppers. These areas can also have a valuable social role as an accessible central place to meet other people and a carbon reduction role with multi-purpose journeys being undertaken.

2.6 The delivery of retail schemes is likely to be private sector led, but the Council can assist in negotiating appropriate retail uses in centres and will resist permanent losses from Primary Shopping Frontages. Within these frontages, proposals for ground floor retail (A1) will be supported. A proposal for ground floor non-retail uses (A2-15) will only be supported if the development does not harm the retail focus on these frontages. On upper floors, there can be support for a diverse range of uses (such as residential or office). This will be considered on a settlement by settlement basis.

**Secondary Frontages**

2.7 In locations of secondary frontage, proposals for ground floor retail (A1) and non-retail uses (A2-A5, D1 and D2) will be supported, as they provided greater opportunities for a diversity of uses such as restaurants and businesses that are complementary to the wider centre function. Nevertheless, care is needed to avoid a cumulative impact that could result from a material or permanent loss to the diversity of retail units and other town centre uses normally expected to be found in these locations. Such an impact could be damaging to the vitality, focus and character of that centre.
3 Sub-Regional Context and Hierarchy

3.1 It is appropriate to look at the retail centres within Wealden as part of a wider sub-regional context. The Wealden Local Plan must have regard to the wider settlement hierarchy in setting an appropriate retail hierarchy for the local authority. The hierarchy has been informed by the Retail Study (2016) and is summarised in the table below, stating the function of the centre and examples of settlements, in line with the NPPF.

Table 1. Retail Hierarchy for the Sub-Region

<table>
<thead>
<tr>
<th>Designation</th>
<th>Function</th>
<th>Towns/Villages/Hamlets</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Centre</td>
<td>A large accessible settlement by different modes with a centre containing a large range of shops, including the sale of high order goods, a range of leisure opportunities and facilities including a hospital with Accident and Emergency services. Settlement meets all its own needs.</td>
<td>Tunbridge Wells / Tonbridge and Eastbourne (all outside of the District boundaries)</td>
</tr>
<tr>
<td>Secondary Centre</td>
<td>An accessible settlement by different modes, containing a range of shops, including high street chains. And facilities including a hospital. Settlement meets the majority of its own needs.</td>
<td>East Grinstead, Lewes and Haywards Heath (all outside of the District boundaries)</td>
</tr>
<tr>
<td>District Centre</td>
<td>An accessible settlement by different modes containing a range of shops, employment opportunities and facilities including secondary school. Not reliant upon other centres within the District to meet day to day needs, but do requires support from other secondary/primary centres to meet residents' needs.</td>
<td>Crowborough, Uckfield, Hailsham</td>
</tr>
<tr>
<td>Service Centre</td>
<td>Sustainable locations with a range of jobs, services and facilities, serving predominately nearby communities and the wider rural area but with accessibility to larger centres.</td>
<td>Heathfield, Polegate and Willingdon, Stone Cross, Wadhurst and Forest Row</td>
</tr>
<tr>
<td>Local Service Centre</td>
<td>Settlements that have a more limited supply of social and economic infrastructure including employment and where local residents depend upon other centres to meet a broad range of needs with some form of accessibility to those centres.</td>
<td>Mayfield, Frant, Buxted, Herstmonceux, Ninfield, Pevensey Bay, Horam, Allfirston, Groombridge, Hartfield, Westham and Rotherfield</td>
</tr>
<tr>
<td>Neighbourhood Centre</td>
<td>A settlement with limited, basic or no facilities but with access to another centre, or a settlement with facilities by poor accessibility or access only to a service or local centre.</td>
<td>Including: Pevensey, Maresfield, Danehill, Five Ash Down, Nutley, High Hurstwood, Upper Dicker, Lower Horsebridge, Hellingly, Rushtlake Green, Mark Cross, Cross in Hand etc.</td>
</tr>
<tr>
<td>Other Classified Settlements</td>
<td>This category covers a wide range of settlements with few or no facilities and services and where further development would be unsustainable.</td>
<td>All other settlements in Wealden.</td>
</tr>
</tbody>
</table>

Table 2. Changes in (Venuescore) Retail Rankings for retail centre

<table>
<thead>
<tr>
<th>Location</th>
<th>Grade</th>
<th>2007 Rank</th>
<th>2015 Rank</th>
<th>Change in Rank</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brighton</td>
<td>Major City</td>
<td>7</td>
<td>6</td>
<td>+1</td>
</tr>
<tr>
<td>Tunbridge Weils</td>
<td>Major Regional</td>
<td>55</td>
<td>52</td>
<td>+3</td>
</tr>
<tr>
<td>Crawley</td>
<td>Regional</td>
<td>55</td>
<td>87</td>
<td>-32</td>
</tr>
<tr>
<td>Eastbourne</td>
<td>Regional</td>
<td>126</td>
<td>117</td>
<td>-9</td>
</tr>
<tr>
<td>Haywards Heath</td>
<td>Sub Regional</td>
<td>374</td>
<td>324</td>
<td>+50</td>
</tr>
<tr>
<td>East Grinstead</td>
<td>Sub Regional</td>
<td>341</td>
<td>350</td>
<td>-9</td>
</tr>
</tbody>
</table>
3.2 The higher order centres (Regional) located outside Wealden District (Eastbourne and Tunbridge Wells) exert a strong influence on shopping patterns and expenditure flows within the District. The survey results have confirmed that a significant proportion of the District’s residents choose to shop outside of the District in these larger centres to meet their main comparison goods and fashion shopping needs. All of the higher order centres identified have plans to strengthen the scale and/or quality of their retail and leisure offer, and will therefore continue to compete with the District’s main centres for shoppers and retail expenditure and market share.

3.3 Wealden’s town and village centre hierarchy has evolved over time and since the publication of the Retail Study (2016). The WLPI&OR stated a preferred option for testing, that was then further refined after public consultation and the completion of the Retail Study. This has resulted in the emerging Wealden Local Plan designation.

### Table 3. Issues and Options Report - Preferred Option for Testing

<table>
<thead>
<tr>
<th>Categorisation</th>
<th>Definition</th>
<th>Centre</th>
</tr>
</thead>
<tbody>
<tr>
<td>Market Town Centres</td>
<td>A Primary Centre with more than 90 retail units serving a wider area with a good range of convenience and comparison retail provision, banking and post office facilities, leisure (including restaurants) community facilities and employment opportunities and are accessible by public transport from surrounding areas.</td>
<td>Hailsham, Crowborough, Heathfield</td>
</tr>
<tr>
<td>Primary District Centre</td>
<td>A centre comprising between 40 and 90 retail units, and providing a good range of similar facilities to a market town but in more limited numbers.</td>
<td>Polegate, Wadhurst, Forest Row</td>
</tr>
<tr>
<td>Secondary Centre*</td>
<td>A centre within small settlements or within neighbourhood areas of market towns, comprising of between 10-40 retail units, providing a range of local retail and service facilities and community and leisure facilities.</td>
<td>For example: Pevensey Bay, Mayfield, Horam, Herstmonceux, Westham, Rotherfield</td>
</tr>
<tr>
<td>Local Service Centre*</td>
<td>A centre of less than 10 retail units, that provides a basic range of retail and limited additional facilities</td>
<td>For example: Ninfield, Frant, Stone Cross, Hartfield, Groombridge and Buxted</td>
</tr>
</tbody>
</table>

*The shaded centres have been reviewed to ensure they meet the NPPF requirements (March 2012, Paragraph 23 and Annex 2: Glossary).

3.4 The Emerging Wealden Local Plan has sought to change the designation of some Town Centres contained within the Core Strategy Local Plan (2013) in order to align with the NPPF (March 2012). The NPPF states (Annex 2: Glossary) that references to Town Centres or centres “apply to city centres, town centres, district centres and local centres but exclude small parade of shops or purely neighbourhood significance.” The NPPF also states that unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.
### Table 4. Emerging Local Plan Designation - Proposed Submission

<table>
<thead>
<tr>
<th>Categorisation</th>
<th>Definition</th>
<th>Centre</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Town Centres</td>
<td>A Primary Centre with more than 90 units serving a wider area with a good range of convenience and comparison retail provision, banking and post office facilities, leisure (including restaurants) community facilities and employment opportunities and are accessible by public transport from surrounding areas.</td>
<td>Hailsham, Uckfield</td>
</tr>
<tr>
<td>Town Centres</td>
<td>A Primary Centre with more than 90 units serving a wider area with a good range of convenience and comparison retail provision, banking and post office facilities, leisure (including restaurants) community facilities and employment opportunities and are accessible by public transport from surrounding areas.</td>
<td>Crowborough, Heathfield</td>
</tr>
<tr>
<td>District Centres</td>
<td>A centre comprising between 40 and 90 units and providing a good range of similar facilities to a market town centre - but in more limited numbers</td>
<td>Polegate, Wadhurst, Forest Row</td>
</tr>
<tr>
<td>Local Centres</td>
<td>A centre within smaller settlements, or within neighbourhood areas of market towns, comprising of between 10 - 40 units, providing a range of local retail and service facilities and community and leisure facilities.</td>
<td>Pevensey Bay, Mayfield, Horam, Herstmonceux, Rotherfield, Stone Cross</td>
</tr>
</tbody>
</table>

#### 3.5 The reclassification means that the centres previously identified as Local Service Centres by the WLPI&OR would not be classified as centres under the NPPF. The Retail study has not considered the relative role, function and offer of the smaller settlements for this reason. It has been justified that Hailsham and Uckfield are the District’s only centres that could accommodate the forecast need for new retail floorspace, subject to unlocking the development potential of the main opportunity sites within and on the edge of both centres. As such these two settlements have been defined by the Council as ‘Main Town Centres’ to reflect the differences in scale, offer and development potential at these settlements.
3 Sub-Regional Context and Hierarchy
4 Town Centre Boundaries

4.1 The Council commissioned consultants to undertake a full review of the Town/District Centres and their boundaries as part of the detailed Town Centre & Retail Study (2016 and 2017 addendum), a key piece of evidence for the Local Plan process. The purpose of this background paper is to explain how the review of the boundaries was undertaken and to justify the designations of the boundaries, by settlement.

4.2 The Retail Study has undertaken health checks on all the designated centres through audits, household surveys and reviews of their functions and operations. Drawing on the accumulated research and evidence, recommendations on the potential for main centres to accommodate the identified need over the short, medium and long term have been assessed. The extent of the Primary Shopping Areas (PSAs) and Secondary Shopping Areas (SSAs) along with their allocated frontage, have been assessed based on current and future provision and needs.

4.3 To clarify, the NPPF defines ‘Primary Shopping Frontages’ (PSFs) as including a high proportion of retail uses which may include food, drinks, clothing and household goods; and ‘Secondary Shopping Frontages’ (SSFs) as providing greater opportunities for a diversity of uses, including non-retail uses (such as restaurants, cinemas and business). The difference between the PSAs and SSAs are defined in Annex 2: Glossary of the NPPF (March 2012) as follows:

- Primary Shopping Area (PSA) – the area where retail development is concentrated and generally comprises the PSFs and those SSFs which are “adjoining and closely related to the primary shopping frontage”.
- Town Centre Boundary (TCB) – includes the PSA and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.

Hailsham

4.4 Hailsham’s main town centre offer is focused around the High Street and George Street. The centre has two purpose built shopping centres: Vicarage Fields and the Quintin’s. These centres are located opposite each other within the Town’s Primary Shopping Area (PSA). Other main shopping streets include: St Mary’s Walk (functioning as a secondary shopping street of mainly independent retailers); North Street (providing access to Tesco and Asda supermarkets); Vicarage Lane (comprising Hailsham Leisure Centre and connected to high street via Waitrose footpath).

4.5 The WLPI&O Report defined the preferred option for testing, with designated primary and secondary frontage as follows (Figure A). This included an extension of the boundary to include industrial and commercial areas along South Street and Diplocks Industrial Estate to the south-west.
4.6 The Retail Study evidence qualifies that the current designation of primary and secondary frontage is appropriate for the settlement. The definitions reflect the main focus of Class A1 (multiple and independent) retail provision across the Town Centre, as well as the location of other Class A2 (Financial and Professional Services), Class A3-A5 (Food and Beverage), Class D2 (Leisure) and other main town centre uses. However, it is considered that the identified land to the west (around Diplocks would be an ‘out-of-centre’ site that is not well connected with the town’s PSA. Even with improved linkages it is considered that the inclusion of sites and land within the proposed extended boundary would not generate significant benefits for the town’s existing shops and businesses in terms of linked trips, footfall and expenditure. Based on the high level review, it is considered that there is opportunity for new mixed use development on the existing sites within and on the edge of the PSA to meet the identified retail need and as such the boundary does not need extending.

4.7 Hailsham’s Town Centre boundary is proposed as outlined below (Figure B), and now closes in the boundary to the south west, inclusive of the South Road car park.
Figure B. Hailsham Retail Boundary - Proposed Submission Stage
Uckfield

4.8 Uckfield is the largest centre in the Wealden District. The town centre’s shops and services are focussed on the linear High Street that runs north to south. The pedestrianised Bell Walk shopping centre is a secondary shopping area, together with Bell Lane. The latter provides access to the Tesco Store and the Bell Lane Industrial Estate which comprises a number of bulky goods orientated retail units. The town centre is anchored by the Tesco store and has the largest representation of national multiple comparison retailers of all the Wealden town centres. It also contains public and private sector offices, a library, places of worship and other social/community facilities.

4.9 Evidence in the Retail Study (2016) forecasts the capacity for new floorspace in Uckfield which can be met over the long term through the extension of existing food stores or by new mixed use development on the edge of the Primary Shopping Area. To meet this the WLPI&O Report tested five potential development options for inclusion within the designated Town Centre boundary (Figure C) to cater for the additional comparison and convenience shopping space in Uckfield. The Retail Study (2016) concluded that the inclusion of the Bell Walk Shopping Centre, just outside the current boundary to the south west, would provide a redevelopment opportunity to provide a mix of modern larger format units that are currently lacking in the town centre. Comprehensive redevelopment of this area could also include the creation of stronger pedestrian linkages and transport interchange between Bell Lane industrial Estate and the High Street to the west, Tesco to the north, and the station to the south. Land assembly would be required for this option.
The revised proposed Uckfield Town Centre designated boundary (Figure D) has now included land at the Bell Walk Shopping Centre as identified below to assist in meeting the additional retail floorspace requirements. In addition, the area to the South of the High Street (i.e. south of Boots on the western side of the High Street and South of Peacocks on the eastern side, including the Bell Walk Shopping Centre) should be redefined as a Secondary Shopping frontage. This will allow for more flexible frontage policies to encourage a wider mix of uses in these areas. For the same reason, it is more appropriate to reclassify Olives Yard from Primary to Secondary Retail Frontage.
Figure D. Uckfield Retail Boundary - Proposed Submission Stage
Heathfield

4.11 Heathfield is a small market town situated to the North of Hailsham. Its shopping offer is anchored by a Sainsbury’s supermarket on Station Road and a Coop on the High Street. It acts as a service centre to a wide rural catchment including a number of small villages. The Retail Study (2016) concludes that Heathfield is a relatively heathy and viable centre with low vacancy rates and good market demand. The WLPI&O Report proposed a reclassification of Heathfield from a service centre to a market town centre.

4.12 It is considered that there are limited opportunities to meet the strategic long term need for new comparison goods floorspace in the Heathfield Primary Shopping Area therefore no new floorspace has been allocated to the centre. As such it is recommended that the designation of the centre is ‘town centre’ rather than ‘main town centre’ in the emerging Wealden Local Plan. The Retail Study (2016) has concluded that the designations of primary and secondary frontage, along with the PSA and town centre boundary remain valid, apart from reclassifying numbers 14-30 High Street as Secondary Frontage as they are considered less important for retail footfall. The revision to the Secondary frontage (north east section of the Town Centre) can be seen on the following maps (Figures E&F).
Figure E. Heathfield Retail Boundary - Issues and Options Stage
Figure F. Heathfield Retail Boundary - Proposed Submission Stage
Crowborough

4.13 Crowborough is a market town and the most northerly in the District. Its retail offer is focused around the High Street and Crowborough Cross, the area around the Broadway and the Waitrose and Morrison supermarkets. However, its role and function as a shopping destination is largely influenced by its proximity to Royal Tunbridge Wells. Crowborough caters predominantly for its local shopping and rural catchments. It has a relatively good choice of multiple and independent shops, service businesses and other facilities.

4.14 The Retail Study identifies that Crowborough is an attractive, vital and viable centre which has shown improvements since 2008. The Study also concluded that the proposed boundaries in the WLPI&O Report were appropriate, robust and justified and therefore remain valid, with no change required (Figure G). The proposed boundaries (Figure H) reflect the main shopping streets and extent of Crowborough’s PSA, including Morrison’s and Waitrose.

4.15 There is no pressing need for new major retail-led developments in the town centre over the plan period. The relatively low level of forecast need could be accommodated by the extension of existing stores, where possible, or the provision of one or more smaller convenience store formats. There is therefore no further retail allocation of retail land within the centre and as such the designation of the centre remains as a town centre, rather than a ‘main town centre’.
Figure G. Crowborough Retail Boundary - Issues and Options Stage
Figure H. Crowborough Retail Boundary - Proposed Submission Stage
Polegate

4.16 Polegate is a small settlement and its main retail, leisure and service offer is focussed around the railway station and High Street. However, the High Street is bisected by the railway line which affects pedestrian flows. The centre sits in the shadow of Hailsham’s catchment and the higher order centre of Eastbourne to the south. It is therefore positioned lower in the retail hierarchy.

4.17 The Retail Study (2016) identifies that the centre appears to be performing well based on vacancy levels, accessibility and parking provision. It does however have a limited offer, and its local shops and services mainly meet the day-to-day needs of its local catchment and those using the railway station. The study concludes that the current mix of uses in the centre adequately meets the local population. There is limited potential to increase the scale of the centres offer due to limited capacity, market demand and development opportunities. As such it is recommended to designate the centre as a ‘District Centre’.

4.18 The study further reviews the designation of the boundaries and frontages and considers them to be reasonable and robust, subject to a few modifications as follows:

- To restrict the boundary of the PSA to the north of the High Street, such that it extends as far as the junction with Victoria Road on the western side of the High Street and as far as no 52 on the eastern side of the High Street;
- To redefine nos. 10-14 on the eastern side of the High Street to the south of the level crossing as SSFs rather than PSFs to allow for more flexible uses;
- To remove the SSFs defined as far south as the town centre, which includes nos. 7-9 High Street, as these units are separated from the centre’s PSA and should be subject to more flexible use;
- To remove the SSFs the north of the town centre, which includes nos.1-4 Millfields/Station Road.

4.19 The revised boundary is reflected in the maps provided below (Figures I and J).
4 Town Centre Boundaries

Figure I. Polegate Retail Boundary - Issues and Options Stage
Figure J. Polegate Retail Boundary - Proposed Submission Stage (Right)
4.20 Forest Row is a small village located in the northwest of the District, south east from East Grinstead. It is considered that the settlement is a relatively attractive, healthy and viable centre, performing well with regards to low vacancy levels. This is a good sign of the strong performance of existing shops and services, and the good demand for space when vacancies do occur. The centre is well served in terms of its retail and service offer, dominated mainly by popular independent and specialist retailers. The centre is underpinned by a popular and profitable market and benefits from good accessibility.

4.21 The Retail Study (2016) has forecast a limited need for new convenience and comparison floorspace over the medium term. It is anticipated that the need can be met through infill development within and/or on the edge of the PSA. With regard to boundaries, the review demonstrates that the current designations are robust and appropriate, but recommend the following changes to reflect the offer along different streets in the centre, as follows:

- The PSFs currently identified that run south from Holy Trinity Church along Lewes Road should be redefined;
- The street frontages that run south along Hartfield Road should be defined as SSFs rather than PSFs;
- The parade of shops on Hartfield Road (nos. 20-27) are located outside both the PSA and centre boundaries and should not be defined as SSFs;
- The Swan Public House at the junction of Priory Road and London Road also appears to be defined as part of the PSF and should be excluded;
- It is considered that the PSF extends too far north along Lewes Road, and should effectively end after the Old Post Office (Shearer's Fine Foods) on the eastern side of Lewes Road, and after the shops on Lower Square on the western side of Lewes Road.

4.22 These suggested changes will help create a more compact primary shopping area and frontages, and allow for more flexibility in those areas covered by SSFs. The following maps provide the amended boundaries (Figures K and L).
Figure K. Forest Row Retail Boundary - Issues and Options Stage (Left)
Figure L. Forest Row Retail Boundary - Proposed Submission Stage (Right)
Wadhurst

4.23 Wadhurst is a historic market town located in the northeast of the District. It is a smaller sized linear centre focused along the traditional High Street and extends from the Square in the south east to the Vicarage in the north west. It is a relatively attractive, healthy and viable centre that is performing well with no vacancies at the point of audit. It has a good mix of convenience and comparison retail, catering for the basic needs of its catchment.

4.24 The Retail Report (2016) forecasts limited need for new retail floorspace, and therefore is not required for the Plan period. As with other centres, the need can me met through infill development within and/or in the edge if the defined PSA.

4.25 The review of retail boundaries has indicated that areas are robust and appropriate in their designations and as such does not require any changes since the WLPI&O Report. As such the following maps (Figures M and N) provide the same designations for the two different stages of the Local plan process.
Figure M. Wadhurst Retail Boundary - Issues and Options Stage
Figure N. Wadhurst Retail Boundary - Proposed Submission Stage
4 Town Centre Boundaries
5 Other Local Centres

5.1 The Retail Study (2016) identified the need to assess any prospective local services centres so that they can be designated at ‘Local Centres’ to meet the requirements of being part of the retail hierarchy in conformity with the NPPF. This section now looks in turn at 6 other settlements, assessing and justifying their designation as local centres and their respective boundaries. The section starts by explaining the methodology for assessing primary and secondary frontages, and then assesses each settlement in turn.

Primary Frontages

5.2 Primary Frontages are identified as those areas with a high proportion of retail uses and in line with the definitions in the NPPF. A methodology for defining the Primary and Secondary Frontages was devised on the basis of survey work for each of the centres, recent trends and changes to the retail mix through changes of use, and the overall size of the centre. These options were the subject of the Wealden Local Plan Sustainability Appraisal (March 2017).

1. A frontage that contains a high proportion of A1 (Shops) uses;
2. A frontage which does not necessarily contain a high proportion of A1 uses but is located in close proximity to the main shopping areas or between other primary shopping frontages;
3. Where a predominantly A1 or A class shopping frontage is broken up by other uses such as, for example, a church, health centre etc. and the primary shopping frontage continues beyond this use, the frontage is shown as a primary frontage.

5.3 The outcome of the Appraisal was that Option 3 would offer positive effects in that it would provide a clear direction for the location of retail frontages and therefore uses, but would combine this with a wider variety of uses which could ensure active frontages are maintained and help with regeneration efforts.

Secondary Frontages

5.4 Secondary Frontages are generally identified as those frontages which include a more diverse range of uses. Several options were considered in relation to the designation of Secondary Frontages, and these were subject to the Wealden Local Plan Sustainability Appraisal (March 2017).

1. Those frontages which include a more diverse range of uses such as restaurants, cinemas and businesses, and fewer ‘A’ class uses;
2. Frontages which tend to be towards the periphery of the primary shopping areas;
3. Frontages in areas where A1 (Shops) units are generally separated from the main shopping areas, on the periphery of the primary shopping area or outside of the primary shopping area, even where they represent an A1 use (such as a supermarket) where the draw and footfall may be considerable.
5.5 The Sustainability Appraisal ruled out Option 2, but highlighted positive aspects to Options 1 and 3. For Option 3, this was that additional benefits may arise as the Option would enable the protection of A1 uses that are not necessarily related to the Primary Shopping Area but are an important asset for the settlement within which they are located.

5.6 Using the criteria set in Chapter 16, WLPI&O Report, the primary and secondary retail boundaries and frontages were defined using survey work and site visits of the settlements.

Pevensy Bay

5.7 The Primary Shopping Area at Pevensy Bay is focused on the A259 Eastbourne Road between the Castle Inn (to the South West) and Sea Road (to the north west). The public car parks at North Road and at Sea Road are also included.

5.8 At the time of survey there were 29 units in the PSA at Pevensy Bay. Of these, 12 were in retail use, 6 were social uses, 10 were service based uses and 1 unit was empty. At 41%, the retail offer is the dominant use.

5.9 The designation of Pevensy Bay as a Local Centre would impose control over the loss of shops and services. It would ensure that applications for changes of use are subject to criteria based testing regarding the loss of retail uses. It is clear that the centre has a Primary frontage along the Eastbourne Road between the junction of Richmond Road/North Road and Sea Road. Close to Richmond Road the units exhibit qualities of secondary frontage due to the nature and type of services operated, coupled with intervening uses from the primary frontage.

5.10 The boundary is provided in Figure O.
Mayfield

5.11 The Primary Shopping Area at Mayfield is centred on the High Street and specifically the linear run of shops and facilities between West Street and Fletching Street. There is a clear break on the north and south side of the High Street with residential uses puncturing the run of retail units. After this the frontage exhibits secondary qualities rather than more dominant retail uses.

5.12 At the time of survey, 37% of units in the Shopping Area were in retail use. 24% of the units were empty at the time of the survey. This is a low score and suggests that the High Street is suffering and is not a destination for shoppers, retailers and businesses in general.

5.13 The designation of Mayfield as a Local Centre is required to impose some control over the uses which make significant contribution to Mayfield High Street. Recent examples of losses to key services within the centre have taken place in a period of policy vacuum. Designation as a Local centre would place control over uses in the centre, ensuring the key day-to-day facilities are retained and ensure the continued vitality and viability of the rural economy. It is clear that the centre has two distinct frontages according to the criteria for primary and secondary definitions. At Mayfield the frontages are divided by blocks of
non-retail uses. Both frontages are along the High Street, albeit that the secondary frontage is peripheral towards the junction with West Street.

5.14 The boundary is provided below (Figure P).

**Figure P. Mayfield Local Centre Boundary**

Herstmonceux

5.15 The Primary Shopping Area at Herstmonceux is focused upon Gardner Street, down to the junction of West End and Hailsham Road where the Woolpack Public House is situated.

5.16 The retail offer in Herstmonceux is not the dominant use (25%) with service base uses prevailing (39%). In addition, there is no continuous frontage of retail uses with fragmentation to the limited retail units in the centre. It indicates conditions that are more aligned with secondary frontage than a primary frontage.

5.17 The designation of Herstmonceux as a Local Centre is required to safeguard retail uses, together with other complementary and ancillary services. The survey work and site visits demonstrated that the centre does not have lengths of frontage where retail uses predominate. The retail offer is more fragmented and broken by other uses and
services. In this way the centre exhibits secondary shopping frontage and this is focused upon Gardener Street.

5.18 The boundary is provided below (Figure Q).

**Figure Q. Herstmonceux Local Centre Boundary**

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Horam

5.19 The Primary Shopping Area at Horam is centred on the High Street between the junction Little London and Vines Cross Road. Within the Primary Shopping Area there is an equal split of 39% units in retail and 39% services. 14% of the units were empty at the time of survey which is indicative of poor health as a retail and business destination.

5.20 There are two distinct frontages which play a complementary role, with a focus of retail uses within the primary frontage and mixed uses and services (with some retail) in the secondary frontage. The former Horam Inn is now used for retail purposes, following a change of use after the closure of the pub.

5.21 The designation of Horam as a Local Centre is required to safeguard retail uses, together with other complementary and ancillary services from unjustified changes of use. The survey work and site visits created two distinct boundaries focused on the B2203
and short length of Little London Road. The public car park off Hillside Drive is included in the Shopping Area but not within a defined frontage.

5.22 The boundary is provided in Figure R.

Figure R. Horam Local Centre Boundary
Rotherfield

5.23 The Primary Shopping Area at Rotherfield is centred on the High Street with short spurs along Church Road, North Street and Station Road. This is the central core of the village alongside the imposing St Denys’ Church.

5.24 Whilst 45% of the units within the Primary Shopping Area are in retail use, these is not a cluster of these uses, and they are interrupted by non-retail and service uses. In this way, the Shopping area exhibits qualities of a secondary frontage. 22% of the units were vacant at the time of survey which points to poor attraction for the centre.

5.25 Whilst there is no growth planned in Rotherfield in the Wealden Local Plan, the designation of a Local Centre would bring control over loss of beneficial uses in the area. Loss of key services will only be supported where justified and in turn would help to safeguard the importance of the centre as a hub for community and day-to-day activity. In turn this would have beneficial effects upon the vitality of the centre and vibrancy of the community. The criteria for frontages at Rotherfield results in lengths of secondary frontage within the centre. They are focused on the eastern end of Church Road, North Street, High Street and a short length of Station Road.

5.26 The boundary is provided below (Figure S).

Figure S. Rotherfield Local Centre Boundary
Stone Cross

5.27 Stone Cross has been re-designated as a Local Centre since the WLPI&O report as it is considered that its retail offer warrants its status as part of the retail hierarchy in conformity with the NPPF. The Primary Shopping Area at Stone Cross is formed by the parade of shops off Dittons Road at Mimram Road. Whilst there are fewer than 10 units, the existing offer is grouped in a distinct precinct of units which abuts The Red Lion and Primary School. The centre is already a focal point, which coupled with amount of growth planned and committed, justifies escalating Stone Cross to a Local Centre.

5.28 The designation of Stone Cross as a Local Centre is required to safeguard retail uses, together with other complementary and ancillary services from unjustified changes of use. Stone Cross has accommodated high amounts of growth in recent years and additional housing is also proposed in the Local Plan (there are 833 new dwellings allocated as part of the Wealden Local Plan at Stone Cross). The centre has scored positively against the Sustainability Appraisal (SA) Objectives in regard to retail provision, but also as a gathering point for the community. There are fragmented retail uses within the centre along with other uses and services. In this way the centre exhibits secondary shopping frontage criteria within the shopping precinct.

5.29 The boundary is provided below (Figure T).

Figure T. Stone Cross Local Centre Boundary
Other Smaller Centres

5.30 As part of the assessment of village centres the retail offer was reviewed in the settlements of Ninfield, Frant, Hartfield, Groombridge, Buxted and Westham. For each of these smaller centres the retail and non-retail offer, diversity of other uses and accessibility is all of neighbourhood significance. Whilst there is no requirement for designation of a primary shopping area in these centres, the Council wishes to see the level and choice of village shops and services maintained and enhanced wherever possible subject to the scale and location to serve local needs and where there is no detrimental impact on the residential character and amenity of an area.

Summary of Local Centre Designation

5.31 The following Table (Table 5) summarises the justification for re-classification or designation of settlements as Local Centres, with a ‘Yes’ meaning they are designated as Local Centres and ‘No’ meaning that they are not designated.

Table 5 - Local Centre Designation

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Justification for inclusion/Exclusion as a Local Centre</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pevensey Bay</td>
<td>Yes - Within the PSA there are 29 units, of which 12 are retail. At 41%, the retail offer is the dominant use</td>
</tr>
<tr>
<td>Mayfield</td>
<td>Yes - Within the PSA, 37% are in retail use, with clear breaks on the north and south side of the High Street. The frontage exhibits secondary qualities rather than more dominant retail uses.</td>
</tr>
<tr>
<td>Horam</td>
<td>Yes - Within the PSA, 39% are in retail use. The two frontages play a complementary role, with focus on retail use in the primary area and mix of uses in (services/retail) in the secondary area.</td>
</tr>
<tr>
<td>Herstmonceux</td>
<td>Yes - An important local centre, but the frontage of retail uses is fragmented, limiting retail and indicating conditions are more aligned with a secondary frontage.</td>
</tr>
<tr>
<td>Rotherfield</td>
<td>Yes - Within the PSA, 45% are in retail use, but no cluster of uses as they are broken by non-retail and service uses.</td>
</tr>
<tr>
<td>Stone Cross</td>
<td>Yes - Whilst there are fewer than 10 units, the existing offer is grouped in a distinct precinct of units. The centre is already a focal point which coupled with the amount of housing growth planned and committed provides justification for escalating to a Local Centre.</td>
</tr>
<tr>
<td>Westham</td>
<td>No - There is a limited retail offer amongst mainly service based commercial units. This is a small parade of units of no more than neighbourhood significance, therefore does not justify designation as a local centre.</td>
</tr>
<tr>
<td>Buxted</td>
<td>No - Although units are located close together, the offer is a modest collection of uses adjacent to the railway station and medical centre/village hall.</td>
</tr>
<tr>
<td>Groombridge</td>
<td>No - The centre amounts to a small parade of shops (some individual, stand alone or with dispersed and fragmented provision) of purely neighbourhood significance. There is no case to escalate these to designated centres.</td>
</tr>
<tr>
<td>Hartfield</td>
<td>No - The rail and other service offer at Hartfield is locally important, but limited and dispersed.</td>
</tr>
<tr>
<td>Frant</td>
<td>No - The retail units are dispersed from one another, and there is no continuous frontage or parade.</td>
</tr>
<tr>
<td>Ninfield</td>
<td>No - The retail units are dispersed and a significant distance from one another, and there is no continuous frontage or parade.</td>
</tr>
</tbody>
</table>
5 Other Local Centres