Wealden District Council Local Plan Examination

Responses to the Inspector’s Matters and Questions for the Stage 1 Hearings

Matter 3: Objectively Assessed Needs for Housing and Employment Land

8th May 2019
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Issue 1: Whether the Council’s approach to calculating its full, objectively assessed needs is justified, based upon up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?

Objectively Assessed Need - Housing

Question 48: Does the plan period cover an appropriate time frame for the provision of housing (2013-2028), and is it consistent with national policy? Should it be extended? If so, why? Why is a different time period chosen to that set for employment and retail matters?

Does the plan period cover an appropriate time frame for the provision of housing (2013-2028), and is it consistent with national policy? Should it be extended? If so, why?

48.1 As noted in the response to Matter 2 Question 32 (which addresses similar issues to Question 48), paragraph 157 of the NPPF 2012 states that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF; be drawn up over an appropriate time scale, preferably a 15-year time horizon; take account of longer term requirements; and be kept up to date. The use of the word “preferably” suggests that deviation from this timescale is acceptable if it is appropriate and justified.

48.2 The Wealden Local Plan has been drawn up to meet needs, where it deliverable to do so, up until 2028 as opposed to 2034 (which would be 15 years from the date of adoption) as identified in the Local Development Scheme, which relates to the underlying information used to derive the OAHN. In result, the Plan’s overall housing figure meets the undersupply between the Core Strategy target set in 2013 (450 dwellings) and the OAHN of 950 dwellings from 2013 to 2018.

48.3 The timescale is considered to be the most appropriate one, taking into account the constraints to additional growth which have already been identified.

48.4 In particular, if there is a 15 year Plan from the date of adoption, the Council will need to consider development of at least 5,700 additional homes using the OAHN within the Plan (not inclusive of any undersupply from neighbouring authorities and the Government’s methodology for calculating need). In this regard, it is therefore to be noted that Wealden District Council has undertaken evidence base work to consider the impacts of the development of 23,333 homes 2013 to 2033, with additional development to that in the Wealden Local Plan, including as follows:

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1 Page 99, Wealden Local Plan Sustainability Appraisal Report, March 2017 Chapter 1-5 (Reference A4)
(1) Additional land allocated in Polegate;
(2) Additional land allocated to the east of Hailsham;
(3) Additional land allocated to the west of Hailsham;
(4) Additional land allocated between south of Hailsham and Polegate; and
(5) Additional land allocated at west of Polegate.

48.5 The consequences of this scale of development are outlined below.

**Transport**

48.6 The Boship Roundabout and other junctions within South Wealden are currently close to their acceptable limit with regards to capacity as shown in the Wealden Local Plan Transport Study (WLPTS) 2018 (reference K1). The WLPTS 2018 identifies interventions to mitigate the impact, but it is limited in terms of the development it can accommodate. The impact of future growth on south Wealden junctions have been considered, but at a level significantly less than what would need to be considered for an extended Plan period. (Temporo7.2 forecasted growth used in the model equates to some 0.8% growth per annum or 4850 households from 2028 to 2038 and associated employment with a balanced growth across the District). Larger housing numbers, a change in timescale, and growth focused onto south Wealden roads will have a greater impact.

48.7 In terms of the areas identified at paragraph 48.4, land at west Hailsham is currently severed from Hailsham by virtue of the A22. This severance and the need to consider impacts of further growth on Boship Roundabout necessitates the need to consider some form of link road. Additional land allocated between south of Hailsham and Polegate would also require consideration of access to south Wealden.

48.8 Additional development within Polegate, and in particular Mornings Mill Farm, would exacerbate impacts upon Eastbourne as identified in the WLPTS 2017 (Reference K2).

48.9 Cumulatively development, including employment development, may require an offline A27. The WLPTS 2018 (document reference K1 page 32, Table B23) identifies that, post 2028, it will be necessary to consider this intervention. The need for an offline A27 would mean an undeliverable Plan, unless funding is provided through the Department for Transport’s Roads Investment Strategy.

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2 Page 13 shows that Boship Roundabout and three other junctions V/C (volume to capacity ratios) 0.95 and higher
3 WLPTS 2018 (document reference K1 Appendix K)
4 Appendix A to Matter 2 Wealden Local Plan Transport Study 2018 – Technical Note Delivery Schedule for Highway Interventions
5 Page 75
This is currently being considered by Government (RIS 2), and it is expected that an announcement will be made later this year.

4.10 Highways England has indicated that if this programme was agreed, the scheme could be completed by mid-2030. However, this is not a fully defined scheme at present, and with current constraints it is considered that this would be an optimistic timetable. (Further, and even if an A27 is not required for delivery of future growth, other junction improvements required by greater growth would cause concerns over delivery owing to funding and ability to develop out within the timeframe).

4.11 In addition to this, without an offline A27 there is currently no evidence of additional mitigation that can be deployed to avoid an adverse impact on the integrity of the Ashdown Forest SAC and Lewes Downs SAC.

**Constraints in the North of the District**

4.12 Land has come forward in the SHELAA\(^6\) in the north of the District. Excluding additional development in Horam and East Hoathly, which are large villages with poor transport links, the most sustainable areas with development potential are Uckfield and Crowborough.

48.13 However, Crowborough and Uckfield have deliverability issues that would need to be overcome in order to extend the Plan period.

48.14 Crowborough is surrounded by AONB which is a constraint to growth. Further, whilst there is land outside the AONB which accesses Western Road, development that accesses Western Road is a particular issue in the area, raised at other Local Plan examinations, and it cannot be confirmed whether significant additional traffic movements could be accommodated, owing to physical constraints within the road network.

48.15 Development within both Uckfield and Crowborough will also require mitigation with regards to Ashdown Forest SPA. Wealden District Council owns two Suitable Alternative Natural Greenspaces (SANGs) to accommodate the development already permitted and proposed. However, potential development on the scale identified will require at least one additional SANG and potentially more, when, from the work undertaken already by Wealden District Council, there are limited opportunities for additional SANGS in the area.

48.16 Importantly, transport improvements required in South Wealden identified up to 2028 and beyond would be prejudiced if CIL / Section 106 is required to fund further SANGs. This impacts upon the deliverability of the Plan and would also have knock on consequences for any new school / health provision which will inevitably be required with further growth.

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\(^6\) Strategic Housing and Economic Land Availability Assessment January 2019 reference A29
Further, development within this area has a disproportionate potential impact upon both Ashdown Forest SAC and Lewes Downs SAC and in Wealden District Council’s view, as the competent authority, it cannot be concluded that additional mitigation would be able to avoid an adverse effect; and it is unknown what the view of Natural England would be with regard to the increased deposition that would take place.

**Landscape**

The prospect of development to the south of Hailsham, west of Hailsham and west of Polegate has resulted in comments of concern from South Downs National Park Authority as part of the response to Regulation 18 (Issues, Options and Recommendation Consultation) (reference C8). In addition, landscape sensitivity comments have also been raised within the South Wealden Growth Area – Landscape and Ecological Assessment Study April 2017 (Reference J5). These issues will need to be resolved, if possible.

Also associated with development to west of Hailsham is the delivery of 600 homes in Berwick Station (this is associated with West Hailsham because of the absence of primary school in Berwick Station and the need to link the development with school provision in West Hailsham) in respect of which there are potential impacts upon South Downs National Park which have been discussed with South Downs National Park and is an area of interest to them (Duty to Cooperate Background Paper January 2019 Reference A32 Appendix SDNP page SDNP 67).

**Wastewater**

There is an acknowledged issue with regards to discharge of treated effluent to Pevensey Levels SAC. Southern Water has identified a modular system to treat effluent to an extent that it does not have an adverse effect on the integrity of the SAC.

However, any increased growth which is directed to these waste water treatment works would need mitigating. In particular, and so far as the Hailsham North and Hailsham South Waste Water Treatment Works are concerned, Southern Water has identified that any additional growth within the catchments above current numbers would need to be planned for in the next investment planning cycle (i.e. 2025-2030 or 2030-2035) as an additional growth scheme.

Although this does not constrain growth in the longer term, subject to further investment, it does mean that there are short term issues with meeting higher housing numbers than currently proposed.

**Conclusion**

The above identified issues result in significant concerns regarding the deliverability of growth beyond that proposed within the Plan; and it is considered that a shorter Plan period, allowing certainty in deliverability, is more appropriate to allow Wealden District Council to work with partners to
overcome these issues. On this basis, the consequence of a 15 year Plan would be an undeliverable Plan.

48.24 Whilst the Local Plan could have proposed a 15 year timeframe with lower growth, this was not considered to be sustainable given the significant need for housing that has been identified. Further, the Submission Plan allows short term stability for the development industry, including the provision of development management policies many of which are currently absent from the current development plan.

48.25 It is therefore considered that the Wealden Local Plan plans positively for infrastructure and development to meet the principles and policies of the framework with an appropriate timeframe; and that an early review will take into account longer term requirements and allow for the Plan to be kept up to date.

Why is a different time period chosen to that set for employment and retail matters?

48.26 Policy WLP1 ‘Provision of Homes and Jobs’ states that 14,228 dwellings will be delivered between 2013-2028, and that land is identified for the delivery of up to 22,500 net additional sq. metres of employment floorspace (B1/B2/B8) and 4,350 sq. metres net additional retail floorspace over the period 2015-2028.

48.27 The Council have proposed a different planning period, starting from 2015, for employment and retail growth, as this was the basis of testing in the underlying economic and retail evidence studies which form the justification for the formulation of policy WLP1. The relevant evidence studies include the following Submission Documents:

- G1 Wealden Economy Study Update March 2018;
- G2 Wealden Economy Study 2016;
- G3 Wealden Economy Study 2016 – Duty to Cooperate Statement;
- G4 Wealden Economy Study 2016 – Executive Summary;
- G5 Town Centre and Retail Study Stage 1 – 2016;
- G6 Town Centre and Retail Study Stage 2 – 2016;
- G7 Town Centre and Retail Study Stage 3 – 2016;
- G8 Town Centre and Retail Study Addendum to Stage 2: Needs Assessment.

48.28 The evidence undertaken for the 2016 Economy Study was based on a start date of 2015 for data production, and its assumptions are still relevant for the purpose of the revised forecasts in the 2018 Study (as noted in para 3.2 of 20-18 Economy Study, Reference G1). The purpose of this was that the underlying economic forecasting datasets for modelling (Experian UK Local Market Forecasts, East of England Forecasting Model and East Sussex Economic Forecasting Model) were from the period Autumn 2014 and, as such, 2015 presented an appropriate timeframe for future delivery. The relevant data was
then used as the basis for testing environmental impacts through the Transport Model for Ashdown Forest⁷.

48.29 The same planning period of 2015-2028 was considered appropriate for retail development, and to ensure consistency of testing for all commercial / employment development.

48.30 Wealden District Council consider the timeframe for delivery (2015-2028) for employment is justified in line with the National Planning Policy Framework (NPPF, 2012) and is appropriate in the light of the evidence base. Further justification is provided in Wealden District Council’s response to Question 55 below.

**Question 49: Is the wider HMA within which Wealden sits appropriately drawn?**

49.1 The Wealden District is the largest authority in East Sussex and is centrally located within the County. It shares a border with seven local authorities (Eastbourne, Lewes, Mid Sussex, Rother, Sevenoaks, Tandridge and Tunbridge Wells) as well as incorporating part of the South Downs National Park (SDNP) to the southwest. The Wealden District has no major settlement and is instead made up of distinct towns/villages across the District, influenced by more substantial settlements to the north (Tunbridge Wells) and south (Eastbourne).

49.2 In April 2014, Wealden District Council appointed Bilfinger GVA to undertake a Strategic Housing Market Assessment (SHMA) to understand Wealden District Council’s current and future housing market, and how this relates to the District’s housing growth and needs. The first draft of the SHMA was issued in December 2014, with the final SHMA report published in August 2016⁸. This report included a section entitled ‘Defining the Housing Market Area’, which sought to identify the wider housing market within which the Wealden District sits and includes a review of the latest migration and travel to work trends, house price data, and other market signals in order to establish the Housing Market Area (HMA).

49.3 The Wealden District Council SHMA (August, 2016)⁹ confirms that the Wealden District HMA encompasses a wider area beyond the district, and includes Eastbourne Borough Council, Tunbridge Wells Borough Council, Rother District Council, Lewes District Council and Mid Sussex District Council.

49.4 In terms of in-migration trends, the Wealden District has strong relationships with Eastbourne, Lewes, Tunbridge Wells, Mid Sussex and Rother, with approximately 43% of those moving to the District coming from these locations

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⁷ GTA Civils Consulting Engineers Ashdown Forest Traffic Model Technical Note – June 2017 and April 2018 (Reference I10 and I11)
⁸ Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3
based on average annual flows for 2010 – 2013, and almost 17% of new residents moving into the Wealden District via Eastbourne\textsuperscript{10}.

49.5 Wealden District also has strong outward migration flows to the other five authorities identified as comprising the wider Wealden HMA, with approximately 44% of outward moves from the Wealden District to these HMA authorities, based on average annual flows from 2010 – 2013\textsuperscript{11}.

49.6 In both cases, the migration patterns are the highest in the five wider Wealden HMA local authority areas when compared with all other local authorities, including other neighbouring authorities to the Wealden District (Sevenoaks District Council and Tandridge District Council).

49.7 In terms of commuting trends, the Census 2011 confirms that a substantial proportion of economically active Wealden District residents work within the Wealden District (42% of Wealden District residents who are economically active), with approximately 35% of working Wealden residents commuting to the five wider Wealden HMA authorities\textsuperscript{12} (most notably Eastbourne at 13% and Tunbridge Wells at 8%). In terms of in-commuting, the Census 2011 shows that of those who are economically active and working within the Wealden District Council administrative area, 59% live within the Wealden District. A further 12% of the Wealden workforce is resident in Eastbourne, 5% are resident in Lewes, 5% are resident in Rother, 4% are resident Tunbridge Wells and 4% are resident in Mid Sussex.

49.8 The Wealden District Council SHMA (August, 2016)\textsuperscript{13} also outlines average house prices (Q2 2013 mean average house price (£)) for those authorities considered to be located within the wider Wealden HMA. Although there are two outliers, with Eastbourne at the lower end (£197,081) and Tunbridge Wells at the higher end (£338,985), the remaining HMA authorities are relatively similar (Wealden, Rother, Lewes and Mid Sussex) in terms of median house price, with an approximate range between £253,000 and £290,000. It is considered that the comparability between these values for the authorities within the wider HMA is likely to contribute to movement evident between these authorities in the analysis of migration patterns and travel to work patterns.

49.9 The evidence clearly demonstrates, therefore, that there are strong relationships between Wealden District and the five identified wider Wealden HMA authorities. However, HMAs are defined in relation to the context and the neighbouring influences acting on a housing market. The Wealden District Council SHMA (August, 2016)\textsuperscript{14} confirms that the HMA defined for Wealden in

\textsuperscript{10} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3, Page Number 14, Table 2.
\textsuperscript{11} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3, Page Number 16, Table 5.
\textsuperscript{12} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3, Page Number 22, Table 9.
\textsuperscript{13} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3, Page Number 26, Table 12.
\textsuperscript{14} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3, Page Number 13, Paragraph 2.10.
the SHMA should not be regarded as a definitive or exclusive HMA and is better understood as a grouping of the local authorities which have the strongest relationship with Wealden. It is accepted that there are HMAs which are centred on other centres such as Tunbridge Wells, Hastings and Eastbourne, which overlap with this HMA, but may have different local authority inclusion.

49.10 It should be noted that the Wealden Economy Study (December, 2016)\textsuperscript{15} also seeks to define the Functional Economic Market Area (FEMA) for the Wealden District and beyond - see: section 2. Although the Wealden Economy Study (December, 2016) highlights that there is no standard approach to defining a place’s FEMA, it has identified several factors that could be considered - including travel to work areas, housing market areas, the flow of goods, services and information within the local economy, administrative areas, catchment areas for facilities providing cultural and social well-being, and the local transport network.

49.11 The Wealden Economy Study (December, 2016)\textsuperscript{16} confirms that there are a number of clear relationships between the Wealden District and its surrounding area and concludes the following:

- Wealden District sees strong commuting flows with Tunbridge Wells, Eastbourne, Lewes, Crawley, Mid Sussex, and Brighton and Hove. The District is influenced by two Travel to Work Areas (TTWAs) – the Tunbridge Wells and Eastbourne TTWAs respectively.
- Data from the ONS shows strong migration flows between Wealden, Eastbourne and Mid Sussex. The HMA identified in the SHMA shows a self-containment rate of over 70%.
- The transport network (via road, rail and buses) connects centres within Wealden District to surrounding centres including Lewes, East Grinstead, Hastings and Tunbridge Wells.

49.12 Given the above, and other factors identified in the Wealden Economy Study (December, 2016)\textsuperscript{17} conclusion on the FEMA, it is concluded that the following Districts / Boroughs form part of the Wealden District’s functional economic area:

- Wealden
- Eastbourne
- Tunbridge Wells
- Lewes
- Mid Sussex
- Rother

\textsuperscript{15} Wealden District Council: Wealden Economy Study, December 2016, G2.
\textsuperscript{16} Wealden District Council: Wealden Economy Study, December 2016, G2, Pages 12-13, Paragraph 2.36.
\textsuperscript{17} Wealden District Council: Wealden Economy Study, December 2016, G2, Page 12-13, Paragraph 2.36.
49.13 This is the same list of Districts / Boroughs as for the wider Wealden HMA that was identified in the Wealden District Council SHMA (August, 2016)\textsuperscript{18} and corroborates the findings of each report. In defining the FEMA, it was recognised within the Wealden Economy Report (December, 2016)\textsuperscript{19} that there are strong ties for the Wealden District with Brighton and Hove and Crawley, especially in terms of travel to work data and migration flows, although these ties are not as strong as those five identified districts/boroughs above.

49.14 In short, it is considered that five authorities identified as forming part of the wider Wealden HMA in the Wealden District Council SHMA (August, 2016)\textsuperscript{20} are the most appropriate local authorities for inclusion and have the strongest and most consistent migration and commuting relationships with the Wealden District.

Question 50: Is Wealden’s functional housing market discrete? How has the housing requirement for the wider HMA been considered with particular reference to the South Downs National Park and Eastbourne BC? Should an OAHN for the wider HMA have been set in addition to the OAHN which is specific to Wealden? What influence have the overlapping and neighbouring housing markets had on the setting of Wealden’s OAHN, in particular those of Eastbourne and the South Down’s National Park?

Is Wealden’s functional housing market discrete?

50.1 As considered under Question 49 above, the Wealden District Council Strategic Housing Market Assessment (SHMA) published in August 2016\textsuperscript{21} established that the HMA for Wealden in this SHMA\textsuperscript{22} is centred on Wealden District, with a grouping of local authorities which have the strongest relationships with Wealden; and there are a substantial number of overlaps with the wider Wealden HMA from other HMAs. This is due to the scale of the Wealden District (the largest in East Sussex), running from the south coast (i.e. Pevensey Bay) to the Surrey / Kent border so that it has a number different influences in terms of its housing market.

50.2 Wealden District Council accepts that there are HMAs which are centred on other centres such as Tunbridge Wells, Hastings and Eastbourne, which overlap with the wider Wealden HMA. But these may have different local authority inclusion. For example, in terms of the West Kent HMA, which includes Sevenoaks District Council, Tonbridge and Malling Borough Council

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\begin{itemize}
  \item \textsuperscript{18} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3.
  \item \textsuperscript{19} Wealden District Council: Wealden Economy Study, December 2016, G2, Page Number 13, Paragraph 2.38.
  \item \textsuperscript{20} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3.
  \item \textsuperscript{21} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3, Page 13, Paragraph 2.10
  \item \textsuperscript{22} This includes Wealden District Council, Eastbourne Borough Council, Lewes District Council, Mid Sussex District Council, Tunbridge Wells Borough Council and Rother District Council.
\end{itemize}
and Tunbridge Wells Borough Council, it is agreed that only Tunbridge Wells Borough Council forms part of the wider Wealden HMA, and this is borne out in the evidence in the Wealden District Council SHMA (August, 2016)\textsuperscript{23}. Wealden District Council accepts that Tunbridge Wells Borough Council also forms part of the West Kent HMA. Similarly, Mid Sussex District Council, although primarily forming part of the Northern West Sussex HMA with Horsham District Council and Crawley Borough Council, also accepts that it has housing market linkages with Wealden District, which is also evidenced in the Wealden District Council SHMA (August, 2016)\textsuperscript{24}.

50.3 Given this, it is not considered that Wealden’s functional housing market is discrete, with a particular local authority or settlement, although its strongest relationships and most consistent migration and commuting relationships are considered to be with Eastbourne to the south and Tunbridge Wells to the north.

50.4 It should be noted that only Rother District Council maintains its position that it should not be included within the wider Wealden HMA and instead considers itself to form a discrete HMA with Hastings Borough Council (the Rother/Hastings HMA); and it is agreed that the HMA position of both authorities does not affect the overall need to consider any potential underrsupply from Rother District Council as it shares an administrative border with the Wealden District in any case (in line with the NPPF\textsuperscript{25}). It should also be noted that Eastbourne Borough Council considers that, although it forms part of the Wealden HMA, it has a discrete HMA with the south of Wealden only, based on its own evidence base. However, WDC considers that this approach would prejudice the overall HMA methodology and neglect to take into account internal movements within the Wealden District (i.e. between the north and south of the Wealden District).

50.5 From 2014 onwards, WDC has sought to identify the HMA relevant to the District in the preparation of its Local Plan and has engaged other local authorities in this regard. The Council has listened to the opposing views of other local authorities, namely Eastbourne Borough Council and Rother District Council as described above, but maintains that the wider Wealden HMA identified in the Wealden District Council SHMA (August, 2016)\textsuperscript{26} is accurate and not a discrete HMA with a single focus.

How has the housing requirement for the wider HMA has been considered with particular reference to the South Downs National Park and Eastbourne BC?

50.6 The housing requirement for the wider HMA has been considered under the Duty to Cooperate process and is evidenced in the Wealden Local Plan Duty

\textsuperscript{23} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3.
\textsuperscript{24} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3.
\textsuperscript{25} National Planning Policy Framework, March, 2012, P1, Page 42, Paragraph 179.
\textsuperscript{26} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3.
to Cooperate Background Paper\textsuperscript{27}, published alongside the Wealden Local Plan (January, 2019)\textsuperscript{28}.

50.7 It is noted that local planning authorities within the wider HMA are at significantly different stages of the plan-making process, with Eastbourne Borough Council adopting its Core Strategy Local Plan in February 2013 (not yet reviewed) and the South Downs National Park Authority (SDNPA) having submitted its Local Plan for examination in April 2018 (at the time of writing still undergoing the examination process). A summary of the various stages of plan-making for each local authority within the wider Wealden HMA is provided within the Duty to Cooperate Background Paper (January, 2019)\textsuperscript{29}.

50.8 The South Downs Local Plan - Pre-Submission (September, 2017)\textsuperscript{30} confirms, under Strategic Policy SD26 (Supply of Homes), that the National Park Authority will make overall provision for approximately 4,750 net additional homes over a 19 year period between 2014 and 2033. This has not changed during the examination process at the time of writing. The Eastbourne Core Strategy Local Plan (adopted February 2013)\textsuperscript{31} under Policy B1 (Spatial Development Strategy and Distribution) will deliver at least 5,022 dwellings between 2006 and 2027 within the built-up area boundary. (However, it should be noted that the Eastbourne Core Strategy Local Plan (February, 2013) is now considered out of date for the purposes of the Housing Delivery Test\textsuperscript{32}).

50.9 In the case of the SDNP, the Wealden Objectively Assessed Need (OAN) update paper 2013 to 2028 (March, 2017)\textsuperscript{33} was based upon the entirety of the Wealden District, inclusive of the SDNP that is located within the administrative area of the Wealden District. In effect, the housing requirement for the SDNP part of the Wealden District is considered to be accounted for within the evidence base that sets out OAHN for the Wealden District as part of the Wealden Local Plan. It is acknowledged that the South Downs National Park is its own local planning authority and is seeking to adopt its own housing requirement through the South Downs Local Plan – Pre-Submission (September, 2017)\textsuperscript{34}. In any case, the SDNP part of the Wealden District has been considered and its needs addressed in the preparation of the Wealden Local Plan (January, 2019)\textsuperscript{35}.

50.10 From discussions, only Eastbourne Borough Council has identified a need for Wealden District Council to meet a shortfall within the timeframe of the Wealden Local Plan. Eastbourne Borough Council identified this need prior to the publication of Issues, Options and Recommendations Consultation

\textsuperscript{27} Wealden Local Plan: Duty to Cooperate Background Paper, January 2019, A32.
\textsuperscript{28} Wealden Local Plan, January 2019, A1.
\textsuperscript{29} Wealden Local Plan: Duty to Cooperate Background Paper, January 2019, A32, Pages 44-45, Paragraphs 5.16 – 5.23.
\textsuperscript{30} South Downs Local Plan – Pre Submission Version, September 2017, S9, Page 122.
\textsuperscript{31} Eastbourne Core Strategy Local Plan, February 2013, S5, Page 12, Paragraph 2.1.1.
\textsuperscript{32} National Planning Policy Framework (NPPF), February 2019, P2.
\textsuperscript{33} Wealden Objectively Assessed Need (OAN) update 2013 to 2028, March 2017, H4.
\textsuperscript{34} South Downs Local Plan – Pre Submission Version, September 2017, S9.
\textsuperscript{35} Wealden Local Plan, January 2019, A1.
Document for the Wealden Local Plan (October, 2015)\textsuperscript{36}. At this stage (October to November 2015), Wealden District Council identified its wider HMA and also indicated an intention to help meet the shortfall of Eastbourne Borough Council beyond its own Objectively Assessed Housing Need (OAHN) requirements.

50.11 However, as reported in the Wealden Local Plan Duty to Cooperate Background Paper (January, 2019)\textsuperscript{37}, subsequent testing of the higher housing numbers with the Wealden Local Plan Issues, Options and Recommendations Consultation document (October, 2015)\textsuperscript{38}, show that those housing numbers were not achievable against the context of an increasing OAHN and environmental/infrastructure constraints. In terms of the infrastructure constraints, significant infrastructure is required for this level of growth and it can only be delivered in a longer plan period, subject to funding, with further work required to understand/resolve impacts of development if possible (see, also Question 48 above). This would include an offline solution to the A27 that is not expected to be implemented before (at the earliest) 2030, which is beyond the Wealden Local Plan period and is uncertain at the time of writing\textsuperscript{39}.

50.12 In terms of other local planning authorities within the wider Wealden HMA, at the current time it is not considered that Wealden District Council will need to meet the needs of Lewes District, Tunbridge Wells Borough, or Mid Sussex District. Rother District Council has confirmed that it does not require Wealden District Council to provide for its housing need within the short timescale of this Plan.

50.13 The wider housing requirement of those authorities within the Wealden HMA have therefore been fully considered in the preparation of the Wealden Local Plan.

Should an OAHN for the wider HMA have been set in addition to the OAHN which is specific to Wealden?

50.14 Consideration has been given to all local authorities that have been defined as being within the wider Wealden HMA through the Wealden District Council SHMA (August, 2016)\textsuperscript{40} in terms of their respective housing requirements. Given the complexities of overlapping HMAs on the wider Wealden HMA (such as the Northern West Sussex HMA, West Kent HMA and Hastings/Rother HMA), it would be difficult to set an addition to the OAHN, over and above that specific to the Wealden District. In addition, with the exception of Eastbourne Borough Council, the remaining authorities included within the wider Wealden

\textsuperscript{36} Wealden Local Plan – Issues, Options and Recommendations, October 2015, C1.
\textsuperscript{37} Wealden Local Plan: Duty to Cooperate Background Paper, January 2019, A32, Page 47, Paragraphs 5.31 – 5.32.
\textsuperscript{38} Wealden Local Plan – Issues, Options and Recommendations, October 2015, C1, Page 55, Preferred Option for Testing 3.
\textsuperscript{40} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3.
HMA have not requested further housing delivery in the Wealden District to meet unmet housing needs through the Wealden Local Plan (and it is considered that the unmet housing needs of the SDNP has already been established as being met through the Wealden Local Plan).

50.15 As considered above, in the case of Eastbourne Borough Council, Wealden District Council has considered options to provide further housing through the production of the Wealden Local Plan Issues, Options and Recommendations Consultation document (October, 2015)\(^{41}\). However, such an option cannot be delivered within the specified plan period of the Wealden Local Plan (January, 2019). Given this, it is not considered appropriate (or achievable) to set an additional OAHN for the wider HMA to be delivered in the Wealden Local Plan (January, 2019).

50.16 It should be noted that the Wealden Local Plan (January, 2019)\(^{42}\) does include a planning policy (Policy WLP 13: Review of the Wealden Local Plan) that outlines mechanisms for the review of the Wealden Local Plan (January, 2019), which includes the need for a comprehensive offline A27 solution between Lewes and Polegate being considered necessary to be delivered within the Plan period.

What influence have the overlapping and neighbouring housing markets had on the setting of Wealden’s OAHN, in particular those of Eastbourne and South Down’s National Park?

50.17 As discussed above, the overlapping nature of HMAs that impact Wealden District does make it difficult to define a wider housing requirement for the Wealden HMA authorities. On the other hand, setting a discrete OAHN with Eastbourne Borough Council may prejudice other local planning authorities that are included within the wider Wealden HMA. This would also contradict the local evidence on the defined wider Wealden HMA that was assessed within the Wealden District Council SHMA (August, 2016)\(^{43}\).

50.18 In terms of the SDNP, the Wealden Objectively Assessed Need (OAN) update paper 2013 to 2028 (March, 2017)\(^{44}\) was based upon the entirety of the Wealden District, inclusive of the SDNP that is located within the administrative area of the Wealden District. In effect, the housing requirement for the SDNP part of the Wealden District is accounted for within the evidence base that sets out OAHN for the Wealden District as part of the Wealden Local Plan. This will also be the case for the newly published Housing Delivery Test that established through the revised NPPF\(^{45}\), since the South Downs National Park Authority will not be the subject of the Housing Delivery Test.

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\(^{41}\) Wealden Local Plan: Duty to Cooperate Background Paper, January 2019, A32
\(^{42}\) Wealden Local Plan, January 2019, A1, pages 74-75, paragraph 6.37.
\(^{44}\) Wealden Objectively Assessed Need (OAN) update 2013 to 2028, March 2017, H4.
\(^{45}\) National Planning Policy Framework (NPPF), February 2019, P2.
Should the recently published 2016-based household projections be taken into account in setting the OAHN?

51.1 The Council, through the production of its Wealden Local Plan, has used the 2014-based household projections to calculate its OAHN for the Wealden Local Plan period between 2013 and 2028 – see: the Wealden Objectively Assessed Need (OAN) update paper 2013 to 2028 (March, 2017)\(^\text{46}\) which uses these projections as the demographic starting point for calculation of the OAHN for the Wealden Local Plan, and for the Plan period (2013-2028) this equates to an on average increase of 891.8 households for each year in the Wealden District which, including the vacancy rate of 2.4%, leads to a demographic requirement of 913 dwellings per annum (dpa).

51.2 If the 2016-based household projections were used as the demographic starting point for the calculation of the OAHN for the same Plan period (2013-2028), this would equate to an on average increase of 848.3 households for each year in the Wealden District which, including the vacancy rate of 2.4%, would lead to a demographic requirement of 869 dpa, or 44 dwellings per annum short of the assumptions made using the 2014-based household projections.

51.3 The latest National Planning Practice Guidance (NPPG)\(^\text{47}\) states that the 2014-based household projections are to be used within the standard method to provide stability for planning authorities and communities; ensure that historic under-delivery and declining affordability are reflected; and be consistent with the Government’s objective of significantly boosting the supply of homes. Furthermore, it is stated within the NPPG\(^\text{48}\) that any method which relies on using the 2016-based household projections will not be considered to be following the standard method for calculating housing need. In this respect, whilst it is acknowledged that this Plan is being examined in relation to the 2012 NPPF, the Council has conformed to the Government’s policy for the higher housing numbers provided by the 2014-based household projections, to ensure the Government’s objective of significantly boosting the supply of homes is reflected at the local level.

51.4 Notwithstanding the above, it is considered that the 2014-based household projections may not necessarily reflect household projections locally, so the Council would still be open to using the 2016-based household projections as its demographic starting point, particularly as these household projections are the most recently published. However, this would likely result in a lower OAHN.

\(^{46}\) Wealden Objectively Assessed Need (OAN) update 2013 to 2028, March 2017, H4.

\(^{47}\) National Planning Practice Guidance (NPPG), February 2019, P3, Paragraph: 005 Reference ID: 2a-005-20190220.

for the Wealden Local Plan (January, 2019)\textsuperscript{49} and would be a major modification to the Local Plan.

If so, what would be the consequence?

51.5 Based on the Council’s calculation, the OAHN using the recently published 2016-based household projections would reduce the housing need within the District. The consequence would be that Wealden District could accommodate a small amount of undersupply from Eastbourne Borough Council within the timeframe of the Plan of 44 dwellings per annum.

Question 52: Is the OAHN figure of 950 dwellings per annum, robust and justified? Does it take into account appropriate market signals, household size and household formation, forecast jobs growth and the need for adequate levels of affordable housing to be provided?

Is the OAHN figure of 950 dwellings per annum, robust and justified?

52.1 The Council considers that the OAHN figure of 950 dwellings per annum is robust and that it has been justified through the Council’s evidence base.

52.2 The OAHN for the Wealden Local Plan (January, 2019)\textsuperscript{50} was first considered through the Wealden District Council Strategic Housing Market Assessment (SHMA) (August, 2016)\textsuperscript{51} based upon the 2012-based household projections published. The Wealden District Council SHMA (August, 2016)\textsuperscript{52} concluded that the OAN, accounting for the latest demographic projections at that time, economic trends and forecasts, market signals and affordable housing provision would be 736 dpa, with this target figure being able to meet the economic growth scenario and to increase affordability in the District.

52.3 However, upon the publication of the 2014-based household projections, the Council commissioned Regeneris to undertake the Wealden Objectively Assessed Need (OAN) update paper 2013 to 2028 (March, 2017)\textsuperscript{53}, using the 2014-based household projections as the demographic starting point for calculating the OAHN for the Wealden Local Plan.

52.4 The aim of the Wealden Objectively Assessed Need (OAN) update paper 2013 to 2028 (March, 2017)\textsuperscript{54} was to provide an updated assessment of the objectively assessed housing need based on the 2014-based population and household projections released in June 2016 based upon the Wealden Local Plan period (2013 – 2028). The paper includes a number of different scenarios

\textsuperscript{49} Wealden Local Plan Submission Version, January 2019, A1.
\textsuperscript{50} Wealden Local Plan, January 2019, A1.
\textsuperscript{51} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3.
\textsuperscript{52} Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3.
\textsuperscript{53} Wealden Objectively Assessed Need (OAN) update 2013 to 2028, March 2017, H4.
\textsuperscript{54} Wealden Objectively Assessed Need (OAN) update 2013 to 2028, March 2017, H4.
for housing need based upon the demographic projections, alternative migration scenarios, economic growth adjustments, market signals and the Local Plans Expert Group (LPEG) methodology for calculating housing need. The full results of these different approaches are tabularised in Table 1.10 of the Wealden Objectively Assessed Need (OAN) update paper 2013 to 2028 (March, 2017)55.

52.5 Four of the six outputs for the OAN for the Wealden District (following market signal adjustments) are between 930 dpa (or 13,900 dwellings between 2013 and 2028) and 972 dpa (or 14,600 dwellings between 2013 and 2028). This includes the demographic, Cambridge econometric and Experian local market forecasts scenarios when adjusted for household formation rates having returned to 2001 conditions at the end of the period, and the LPEG method based on long-term migration. If an artificial 10% uplift was applied to the demographic baseline (i.e. the 2014-based household projections and vacancy rate), then this would result in a housing target figure of 1,005 dpa (or 15,100 dwellings between 2013 and 2028). The LPEG method based on the 2014-household projections produced a figure of 1,233 dpa (or 18,500 dwellings between 2013 and 2028) that was based upon a substantial market uplift of 25% when compared to the demographic baseline and household formation rates.

Table 1: OAHN Outputs for the Wealden District, 2013 to 202856

<table>
<thead>
<tr>
<th>OAHN for Wealden District, 2013 to 2028</th>
<th>Total Dwellings (2013-2028)</th>
<th>Dwellings per annum</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demographic Projections</td>
<td></td>
<td></td>
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<tr>
<td>Starting point projection</td>
<td>13,700</td>
<td>913</td>
</tr>
<tr>
<td>Long-term migration</td>
<td>9,400</td>
<td>625</td>
</tr>
<tr>
<td>Short-term migration trends</td>
<td>12,900</td>
<td>862</td>
</tr>
<tr>
<td>Economic Forecasts</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cambridge Econometrics</td>
<td>13,700</td>
<td>916</td>
</tr>
<tr>
<td>Experian Local Market Forecasts</td>
<td>13,100</td>
<td>876</td>
</tr>
<tr>
<td>OAN for Wealden District (following market signals adjustments)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10% uplift Demographic</td>
<td>15,100</td>
<td>1,005</td>
</tr>
<tr>
<td>Household Formation Rates return to 2001 conditions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Demographic</td>
<td>14,500</td>
<td>968</td>
</tr>
<tr>
<td>Cambridge Econometrics</td>
<td>14,600</td>
<td>972</td>
</tr>
<tr>
<td>Experian Local Market Forecasts</td>
<td>13,900</td>
<td>930</td>
</tr>
</tbody>
</table>

55 Wealden Objectively Assessed Need (OAN) update 2013 to 2028, March 2017, H4, Page 8, Table 1.10.
56 Wealden Objectively Assessed Need (OAN) update 2013 to 2028, March 2017, H4, Page 8, Table 1.10.
LPEG method | Based on SNPP 2014 (as per LPEG) | 18,500 | 1,233 |
<table>
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<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Based on long-term migration</td>
<td>14,200</td>
<td>946</td>
</tr>
</tbody>
</table>

52.6 Given the above evidence, it is considered that 950 dpa (or 14,250 dwellings between 2013 and 2028) is the appropriate OAHN figure for the Wealden Local Plan under the NPPF published in March 2012. This would correlate with at least four out of the six outputs for OAHN for the Wealden District (following market signal adjustments) and would be in line with the National Planning Practice Guidance (NPPG) in terms of accounting for the 2014-based household projections, economic forecasts for job growth and an assessment of market signals uplift.

52.7 This would be a significant increase over the current adopted Wealden District Core Strategy Local Plan (2013) target of 450 dpa and recent net housing completions that averaged 536 dpa between 2013/14 to 2017/18. As a consequence, an OAHN of 950 dpa would represent a step change in house building across the District over the Plan period and would be compliant with the NPPF (March, 2012) in terms of boosting significantly the supply of housing in the Wealden District.

Does it take into account appropriate market signals, household size and household formation, forecast jobs growth and the need for adequate levels of affordable housing to be provided?

52.8 Yes. As evidenced in the Wealden Objectively Assessed Need (OAN) update paper 2013 to 2028 (March, 2017), the Council has considered market signals, household size and household formation, two separate forecasts for jobs growth, and the need for adequate levels of affordable housing to be provided (the latter issue is largely contained within the Wealden District Council SHMA (August, 2016).

52.9 In terms of affordable housing provision, the Wealden District Council Strategic Housing Market Assessment (SHMA) (August, 2016) concludes in its key findings that there is an affordable housing requirement of 6,436 households over the projection period (2013-2033), which equates to 322 households as an annualised requirement figure. This assumed that that entire affordable need backlog is cleared by the end of projection period. Allowing for Wealden’s 2.8% vacancy rate recorded in the Wealden District...

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60 Wealden Objectively Assessed Need (OAN) update 2013 to 2028, March 2017, H4.
Council SHMA (August, 2016)\(^{63}\) (which adequately facilitates housing market churn) it was identified that there would be an affordable housing requirement of 6,617 dwellings over the projection period (2013 – 2033) or 331 dwellings annually.

52.10 As discussed above, it is considered that the OAHN figure of 950 dpa is robust and justified. It is noted if the full net affordable housing needs were to be met (i.e. 331 dwellings per annum) through the delivery of the OAHN figure, this would amount to least 34.8% of all homes built within the District between 2013 and 2028 being affordable. In addition, the Wealden Local Plan Viability Study (July, 2017)\(^{64}\) confirms that an affordable housing target of 35% would not jeopardise housing delivery within the District, although it confirms that larger sites to the south of the District, including the South Wealden Growth Area (SWGA), may be marginal in terms of viability with a 35% affordable housing target in place.

52.11 Policy HG3 of the Wealden Local Plan (January, 2019)\(^{65}\) requires 35% of housing developments to be affordable. It also outlines that affordable housing provision will only be required on those development sites of 6 dwellings (net) or more in areas defined as being within the High Weald Area of Outstanding Natural Beauty (AONB) or development sites of 11 dwellings (net) or more, and with a combined gross floorspace of more than 1,000 sqm outside of the High Weald AONB. Whilst a considerable number of sites will be above these thresholds, it is not anticipated that full identified affordable housing needs of the Wealden District will be met through the Wealden Local Plan (January, 2019)\(^{66}\). Nonetheless, the affordable housing need of the Wealden District has been considered through the Wealden District Council Strategic Housing Market Assessment (SHMA) (August, 2016)\(^{67}\) and through the production of the Wealden District OAHN.

**Question 53: Has an allowance been made for vacancy rates and second homes with reference to existing and future housing stock?**

53.1 Wealden District Council first established its Objectively Assessed Housing Need (OAHN) figure through the Wealden District Council Strategic Housing Market Assessment (SHMA) that was published in August 2016\(^{68}\). This was based upon the 2012-based population and household projections that was used as starting point for analysis. The Wealden District Council SHMA\(^{69}\) confirms that the vacancy rate used for establishing the OAHN at this time was

\(^{64}\) Wealden Local Plan – Viability Study, July 2017, H11.
\(^{65}\) Wealden Local Plan (January, 2019), A1, Pages 513-514.
\(^{66}\) Wealden Local Plan (January, 2019), A1.
\(^{67}\) Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3.
\(^{68}\) Wealden District Council: Strategic Housing Market Assessment Final Report, August 2016, H3.
2.8%: there were 1,805 vacant dwellings in Wealden in 2011 (i.e. 2.8% of the total stock).

53.2 As noted under Question 52 above, the Council considered that there was requirement to update the OAHN to take account of the 2014-based household projections and commissioned Regeneris Consulting Ltd to undertake a review of its Wealden District Council SHMA that was named the ‘Wealden Objectively Assessed Need (OAN) Update Paper 2013 to 2028’ (March, 2017). This outlines a number of different outputs for housing need in the Wealden District between 2013 and 2028, based on a demographic starting point, economic forecasts, an assessment of market signals uplift and the method proposed by the Local Plan Expert Group (LPEG).

53.3 It is noted that the Tables for the LPEG methods (based on 2014–based population and household projections and the alternative based on long term migration) account for a vacancy rate within the Wealden District of 2.4%. This was based on average Council Tax Base data from the (then) Department for Communities and Local Government (DCLG) between 2013 and 2015. This was a slight decrease from the figure used in the Wealden District Council SHMA (August, 2016) that was based on the 2011 Census. The Council has assumed that ‘second homes’ are not likely to significantly increase during the Plan period.

Question 54: Is the level of housing planned appropriate? Should it be increased or decreased? If so, to what level and on what basis?

Is the level of housing planned appropriate?

54.1 Yes. Through the production of the Wealden Local Plan (January, 2019) and its associated evidence base, it can deliver the 14,228 (net) dwellings between 2013 and 2028 as outlined under Policy WLP 1 (Provision for Homes and Jobs), which reflects the District’s objectively assessed housing needs calculated by reference to the 2012 NPPF. However, due to various constraints, specifically the impact upon Natura 2000 sites, infrastructure constraints and other landscape / ecological designations (such as the High Weald Area of Outstanding Natural Beauty (AONB)), the Local Plan would be unable to deliver above this housing target.

Should it be increased or decreased? If so, to what level and on what basis?

54.2 Wealden District Council does not consider that the housing planned for within the Wealden Local Plan (January, 2019) under Policy WLP 1 (Provision for Homes and Jobs) should be increased or decreased.

71 Wealden Objectively Assessed Need (OAN) update 2013 to 2028, March 2017. H4, Pages 6-7, Tables 1.8 and 1.9.
73 Wealden Local Plan, January 2019, A1, Page 50.
**Employment**

**Question 55: Does the plan period cover an appropriate time frame for the provision of employment and retail matters (2015-2028) and is it consistent with national policy? Should it be extended, if so why?**

55.1 Policy WLP1 ‘Provision of Homes and Jobs’ of the Submission Wealden Local Plan state that land is identified for the delivery of up to 22,500 net additional sq. metres of employment floorspace (B1/B2/B8) and 4,350 sq. metres net additional retail floorspace over the period 2015 to 2028.

55.2 The timeframe of 13 years is considered appropriate for the reasons outlined in this statement (see, in particular, Question 48) and is in general conformity with the National Planning Policy Framework (NPPF, 2012), which states in paragraph 157 that “Local Plans should be drawn up over an appropriate timescale, preferably a 15 year time horizon.” The use of the word ‘preferably’ suggests that deviation from this timescale is acceptable if it is appropriate and justified.

55.3 The Council have proposed a planning period of 2015-2028 for employment and retail growth as this was the basis of testing in the supporting evidence studies, which form the justification for the formulation of policy WLP1. The evidence studies include the following Submission Documents:

- G1 Wealden Economy Study Update March 2018;
- G2 Wealden Economy Study 2016;
- G3 Wealden Economy Study 2016 – Duty to Cooperate Statement;
- G4 Wealden Economy Study 2016 – Executive Summary;
- G5 Town Centre and Retail Study Stage 1 – 2016;
- G6 Town Centre and Retail Study Stage 2 – 2016;
- G7 Town Centre and Retail Study Stage 3 – 2016;
- G8 Town Centre and Retail Study Addendum to Stage 2: Needs Assessment October 2017.

55.4 The evidence undertaken for the 2016 Economy Study was based on a start date of 2015 for data production, and its assumptions were still relevant for the purpose of the revised forecasts in the 2018 Economy Study (Reference G1) as stated at paragraph 3.2.

55.5 The reason for this was that the underlying economic forecasting datasets for modelling (Experian UK Local Market Forecasts, East of England Forecasting Model and East Sussex Economic Forecasting Model) were produced in Autumn 2014 and as such a start date of 2015 provided an appropriate timescale for future delivery. In addition to this, at this time, housing data was provided for the planning period 2015-2028 in order to test the impact of overall population and residential growth on employment needs for the District.
55.6 The Wealden Economy Study (2018) (Reference G1) at paragraph 3.14 states that “all economic forecasts are subject to a large degree of uncertainty…and the challenge is therefore to identify which forecasts represents the most plausible view of future prospects for the District.”

55.7 This level of uncertainty therefore provides an appropriate justification for limiting the end timeframe for the planning period to 2028, and as such is reasonable. Future need beyond this timeframe could be considered as part of any future review of the Local Plan, with its related plan period, and therefore the timeframe for the Wealden Local Plan should not be extended beyond 2028.

55.8 The NPPF (2012) is not explicitly prescriptive in its requirements for employment or indeed other identified need to be assessed over the exact same timeframes. The difference in the start of the planning period to residential growth is purely a reflection of the underlying data assumptions, which is considered reasonable and appropriate based on the methodology for calculating employment need.

55.9 The same planning period of 2015-2028 was considered appropriate for retail development, in order to match the testing that was undertaken for employment development, as above and to provide consistency for all commercial/employment development.

55.10 The Council’s updated retail evidence in the Town Centre and Retail Study Addendum (Submission Document G8) in October 2017, qualifies in paragraph 1.5 that “it should be noted at the outset that capacity forecast carried out over a long period of time are inherently less certain and should be treated with caution… we advise the Council that greater weight should be placed on the short term forecast carried out over a 3-5 year period in accordance with the NPPG.”

55.11 It is on this basis that the Council consider that the plan period is most appropriate and should match that of business space forecasts.

55.12 The NPPF (2012) is not explicitly prescriptive in its requirements for retail or indeed other identified need to be assessed over the exact same timeframes. The difference in the start of the planning period to residential growth is purely a reflection of the underlying data assumptions, which is considered reasonable and appropriate based on the methodology for calculating retail need. It is therefore considered that the timeframe for the Plan should not be extended beyond 2028.
Question 56: Is the objectively assessed need for economic development based on an appropriately defined Functional Economic Market Area (FEMA)? In particular, how have the economic linkages with Eastbourne been considered?

56.1 Wealden District Council have undertaken a thorough assessment in identifying its Functional Economic Market Area (FEMA) in line with National Planning Practice Guidance. This was undertaken at the initial stage of determining the Council’s economic development needs over the planning period.

56.2 The Wealden Economy Study 2018 (Reference G1), at paragraph 2.2, highlights that there is no standard methodology for defining a place’s FEMA, but identifies several factors that should be considered including: travel to work areas; housing market areas; the flow of goods, services and information within the local economy; administrative areas; catchment areas for facilities providing cultural and social well-being; and the local transport network. All of these factors were taken account of in developing the District’s FEMA.

56.3 The Economy Background Paper, January 2019 (Reference A17), at paragraph 2.3, provides a useful summary of the discussions and consultations with all relevant neighbouring Local Authorities through the development of the Economy Study, which also incorporates a Duty to Cooperate Statement December 2016 (Reference G3).

56.4 In particular, the following Local Authorities were contacted and invited to comment on the report at an early stage in the development of the FEMA (15 September 2016) and in the development of a Final Draft Report (21 February 2017):

- Rother District Council (responded to both stages);
- Tunbridge Wells Borough Council (responded to both stages);
- Hastings Borough Council (responded to FEMA stage);
- Mid Sussex District Council (responded to Final Draft stage);
- Lewes District Council (no response to either stage);
- Eastbourne Borough Council (no response to either stage).

56.5 Whilst there were no substantive comments from Hastings Borough Council and Mid Sussex District Council, comments of support of the approach and forecasting method were provided by Tunbridge Wells Borough Council. Although Rother District Council disputed the inclusion of Rother within the FEMA, the FEMA has been justified with the following conclusions:

- The Housing Market Area implies a sensible approach for the FEMA for Wealden District, with strong migration links and reaching the threshold of 70% self-containment as identified in Planning Policy Practice Guidance;
• Strong commuting flows are evidenced with all neighbouring authorities, with significant influence from the Tunbridge Wells and Eastbourne Travel to Work Areas;
• House prices in Wealden align with those in Lewes, Mid Sussex, Tunbridge Wells and Rother; and
• The transport network, A22/A26/A27 and growth corridors identified in the SEP and East Sussex Growth Strategy influence each of the local authorities in the FEMA.

56.6 The Wealden Economy Study 2018 (Reference G1) summarises, at paragraph 2.3, that taking into account all of the evidence, the FEMA consists of the Local Authority areas of Wealden District, Tunbridge Wells Borough, Eastbourne Borough, Lewes District. Mid Sussex District and Rother District. The Submission Wealden Local Plan January 2019 (Reference A1) confirms, at paragraph 3.19, that the FEMA follows the Housing Market Area as shown in Figure 1 (see below). However, it is acknowledged that, in addition, both Brighton and Hove and Crawley exert a weak economic link with Wealden District.

56.7 WDC has recognised the importance of its linkages to Eastbourne Borough Council as part of the area’s identification in its FEMA, and appreciates its linkages specifically to the South Wealden Growth Area, which is directly north of Eastbourne District. This is exemplified further in joint studies that have been undertaken for Wealden and Eastbourne, such as strategic transport studies and the strategic economic importance of A22/A27 Eastbourne-South Wealden Growth Area in the SE LEP Strategic Economic Plan. Strong commuting flows for travel to work have been evidenced, and Wealden District is located within Eastbourne’s Travel to Work Area.

56.8 Other economic linkages that WDC have considered through its evidence base include Eastbourne’s role as a Primary Retail Centre and its strong draw from residents in South Wealden for comparison shopping and leisure provision. This has led to the development of an appropriate retail hierarchy for Wealden District in the Submission Wealden Local Plan, January 2019 (Reference A1), in Policy TC1 ‘Hierarchy of Retail Centres’ page 122.

56.9 WDC has concluded in paragraph 8 of its Economy Background Paper, January 2019 (Reference A17), that the potential oversupply of identified employment land in the Wealden Local Plan can assist Eastbourne Borough Council, as follows:

“The higher amount of proposed employment land development overall (compared to calculated need and forecasts) provides flexibility to assist in meeting the employment needs of Eastbourne Borough Council who have identified an issue with delivering its required B8 floorspace requirements, due to a lack of suitable development sites within their local authority. This

74 South Wealden and Eastbourne Transport Study, November 2010 (Reference K3)
75 Travel to Work Areas, United Kingdom, 2011 (Office for National Statistics)
76 Wealden Economy Study, 2016 (Reference G2)
also meets the requirements of the NPPF (2012, para. 21) in being flexible to accommodate unidentified need and changing economic circumstances."

56.10 The Council continue to support meeting Eastbourne Borough Council’s needs through paragraph 8.3, as follows:

“Economic forecasts for Wealden District are below the previous trend for supply within the District. This may be an indirect result of meeting Eastbourne Borough Council’s (EBC) undersupply. In their most recent Annual Monitoring Report (AMR), EBC state(para 7.18) that “Eastbourne is developing less employment land than required and the Employment Land Local Plan seeks to address this issue through policies that will provide sufficient employment land development to meet the needs of the future. Over the monitoring year there was a decrease in the overall number of people employed by around 1,000.” and that the trend of loss of office accommodation to other uses, particularly residential, continues. EBC’s most recent Economic Development Needs Assessment(EDNA) 2017, increases their overall business floorspace need to 70,090 sq m (of which 50,770 sq m is Class B8), compared to their Employment Land Local Plan requirement of 48,750 sq m over the period 2012-2027. It is therefore clear that the Employment Land Local Plan will not be able to assist in meeting recent identified need (albeit for a longer planning period).The flexibility within Wealden District Council’s policy approach allows the Council to assist in meeting Eastbourne’s unmet need by the Council oversupplying against local forecasts.”

56.11 WDC therefore concludes that they have satisfactorily considered the economic linkages with Eastbourne in the development of policy for employment needs for the District and the wider FEMA. Sufficient flexibility in the quantum of employment land identified within the Wealden Local Plan will help to assist Eastbourne Borough Council in their historic shortfall of delivering employment floorspace.
Figure 1 Housing Market Area (Page 21 of the Submission Wealden Local Plan, January 2019) (Reference A1)
**Employment Provision and Capacity**

57.1 WDC has prepared an Economy Background Paper, January 2019 (Reference A17) to summarise the process of assessing the employment needs for the District and the quantum of development allocated and identified in the Submission Wealden Local Plan, January 2019 (Reference A1).

57.2 The Economy Background Paper identifies, at paragraphs 5.4.5-6, that the Experian-based forecast identified a baseline need for 45,100 sq. m of employment floorspace. This was based on an updated assessment of the Economy Study, 2018 (Reference G1), which factored in revised levels of housing growth and population projections.

57.3 It is important that the forecast is considered as a baseline need, as the Council has already benefitted from a number of completions and commitments on employment sites across the District in recent years. Without the further growth identified, smaller employment development across the District in more rural locations could be stifled. It is therefore relevant to look at a higher growth scenario of business floorspace, matching historic completions rates and translating this into future growth opportunities across the District.

57.4 Increasing the level of employment provision from the baseline position is considered appropriate as it provides opportunities for job growth and commercial development within smaller, more peripheral locations across the District. It would also result in a reduced volume of traffic travelling to work and would therefore have positive sustainability benefits with regards to traffic flows across the Ashdown Forest. It also supports the requirements of paragraph 28 of the National Planning Policy Framework (NNPF, 2012) by supporting a prosperous rural economy. Wealden District Council has had strong regard to: “supporting economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.”

57.5 Appropriate jobs growth figures have been accommodated within the Wealden Local Plan through the use of the Transport Model for the Ashdown Forest. The Transport Model uses the Trip End Model Presentation Programme77 (TEMPRO). The total is distributed in Modified Middle Super Output Areas (MSOAs) in accordance with TEMPRO and results in a maximum job growth and equivalent employment floorspace for each MSOA.

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77 TEMPRO is the industry standard tool for estimating traffic growth, required when assessing the traffic impact of a development on the local highway network. The datasets used are approved by the Department for Transport.
57.6 WDC consider that a combined site allocation (A22 Employment Sector) and jobs growth figures for identified locations across the District is appropriate. In principle, an oversupply against the overall business land requirements will be more representative of recent delivery rates, the vibrancy of the local economic market, and the level of employment commitments currently in the planning system. The increased employment space figures will provide suitable flexibility to help meet undersupply in Eastbourne Borough Council (although the exact amount has not been quantified) and will accommodate any future changes in economic circumstances over the short to medium term, before the next review of the Local Plan.

57.7 In conclusion, the Economy Background Paper, January 2019 (Reference A17) demonstrates that the formulation of employment policy and provision through the Local Plan is fully compliant with the requirements of the NPPF (2012), particular in relation to supporting the rural economy. The Economy Background paper demonstrates that the proposed economic strategy and policy provides the most sustainable strategy, supported by the Council’s full Sustainability Appraisal78 (2017 and 2018 Version). The level of employment provision should not be increased or decreased as it is appropriate as distributed, tested and modelled for the purposes of the Transport Model for the Ashdown Forest79. The sensitive nature of the modelling would mean that any proposed significant increase overall or in any MSOA would compromise the Council’s ambition to limit the negative environmental impacts on the Ashdown Forest.

Retail Provision and Capacity

57.8 WDC has prepared a Retail Boundaries Background Paper, January 2019 (Reference A18) to summarise the process for determining the retail needs for the District and the quantum of development allocated and identified in the Submission Wealden Local Plan, January 2019 (Reference A1).

57.9 The Retail Boundaries Background Paper, at paragraphs 4.1-4.4, identifies that the Council commissioned a Town Centre and Retail Study80 (2016 and 2017 addendum), with paragraph 4.3 introducing the calculation of retail need, and summarises that the capacity for new retail floorspace is broadly derived from the forecast growth in population and expenditure after making an allowance for new retail commitments and the increased productivity or efficiency of all existing and new retail floorspace.

57.10 The Council’s overarching approach to retail development is to focus new development within the settlements and ‘Main Town Centres’81 of Hailsham and

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79 GTA Civils Consulting Engineers Ashdown Forest Traffic Model Technical Note – June 2017 and April 2018 (Reference I10 and I11)
80 Town Centre and Retail Study (Stage 1-3) 2016 (Reference G5-G7) and the Town Centre and Retail Study Addendum to Stage 2: Needs Assessment (Reference G8)
81 Policy TC1 Hierarchy of Retail Centres, p124, Submission Wealden Local Plan, January 2019 (Reference A1)
Uckfield, with further retail growth being permissible in other centres, subject to other policies in the Wealden Local Plan.

57.11 For the purposes of calculating need, it is important to note that it is assumed the Council’s housing led population growth will only impact on the population forecast of areas in the South Wealden Growth Area and, as such, population growth is higher than Experian forecasts. Conversely for all other areas, including the settlements of Uckfield and Crowborough, residential numbers result in population growth below that forecast by Experian. In these instances, the Experian forecasts, which are trend based, are used. This leads to some limitations with regards to overall need and may overestimate demand in settlements outside of the South Wealden Growth Area. Flexibility regarding allowed windfall growth in the Wealden Local Plan could assist in bridging the gap in the forecast need, along with allowing designated retail centres to adapt to future changing economic circumstances.

57.12 The Retail Boundaries Background Paper notes, at paragraph 4.5, that long term forecasts should be treated with caution as they will be influenced by dynamic changes in the economic, demographic and market trends. Greater weight is therefore afforded to short term forecasts, carried out over a five year period. The Council therefore consider that the Local Plan’s flexibility in supporting windfall growth in smaller retail centres outside of the allocations in Hailsham and Uckfield will allow for retail areas to develop in response to the changing economy; and that the levels of retail development floorspace proposed for the two Main Town Centres, which is supported by qualified evidence, is appropriate and does not require increasing or decreasing.